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Friday, 18 February 2022

To: The Members of the **EXECUTIVE**
(Councillors: Alan McClafferty (Chairman), Colin Dougan, Shaun Garrett,
Rebecca Jennings-Evans, David Mansfield, Adrian Page and Robin Perry)

Dear Councillor,

A meeting of the **EXECUTIVE** will be held at Surrey Heath House and
www.youtube.com/user/SurreyHeathBC on Monday, 28 February 2022 at 6.00 pm. The
agenda will be set out as below.

Please note that this meeting will be recorded.

Yours sincerely

Damian Roberts

Chief Executive

AGENDA

Pages

Part 1 (Public)

- | | | |
|----|--|-----------|
| 1. | Apologies for Absence | - |
| 2. | Declarations of Interest | - |
| | Members are invited to declare any interests they may have with respect to matters which are to be considered at this meeting. Members who consider they may have an interest are invited to consult the Monitoring Officer or the Democratic Services Officer prior to the meeting. | |
| 3. | Draft Surrey Heath Local Plan: Preferred Options (2019 - 2038) | 3 - 646 |
| 4. | Local Development Scheme | 647 - 664 |
| 5. | Review of Parking Fees and Charges | 665 - 692 |

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Surrey Heath Borough Council

Executive

28th February 2022

Draft Surrey Heath Local Plan: Preferred Options (2019 – 2038)

Portfolio Holder:	Cllr Adrian Page – Planning and People
Strategic Director/Head of Service	Bob Watson / Gavin Chinniah
Report Author:	Jane Reeves – Planning Policy Manager
Key Decision:	No
Wards Affected:	Whole Borough

1. Summary and purpose

- 1.1 The Surrey Heath Local Plan will set out a planning framework for the Borough, including new site allocations and Borough wide planning policies for the period up to 2038. Once adopted, the Local Plan will replace current Development Plan policies comprising:
- Saved policies in the Surrey Heath Local Plan, 2000
 - Core Strategy and Development Management Policies, 2012
 - Camberley Town Centre Area Action Plan, 2014
- 1.2 National planning guidance requires local authorities to produce local plans and sets out the required stages of production in national Town and Country Planning (Local Planning) (England) Regulations 2012. This includes consultation on draft versions of local plans prepared in accordance with the requirements set out under Regulation 18. Following the consultation on a Surrey Heath Issues and Options document in the summer of 2018, a further Draft Local Plan: Preferred Options has been prepared for consultation with residents and other stakeholders.
- 1.3 This 2022 Draft Local Plan (Regulation 18) sets out more detailed planning policies and site allocations policies than that contained in the 2018 Local Plan document. It also has regard to the most up to date national planning policy as well as technical evidence prepared to support the Local Plan. Changes include extending the plan period to 2038 to cover a minimum 15 year period from adoption as advised in national planning policy.

- 1.4 It is important to highlight as part of the development of the new Local Plan, that a Local Plan Working Group (LPWG), was formed, made of Councillors cross-party from the Council. The LPWG have discussed in detail a full range of spatial strategies, topics and policies over the past few years and this process has been very collaborative. As a result of all this work, detailed policies and site allocations supported by the LPWG have been developed. At a meeting on 24 January the LPWG endorsed and supported this version of the Draft Local Plan being considered for approval by Executive. It should be noted that the LPWG will continue to be involved in the development of the new Local Plan at all stages of the process.
- 1.5 In summary the Draft Plan:
- Delivers a positive vision for the future of Surrey Heath balancing the need for development against significant environmental constraints.
 - Sets a strategy to focus new development within the settlement areas to the West of the Borough to optimise delivery of development in the most sustainable and accessible locations.
 - Supports high quality and high-density development on key sites in Camberley Town Centre to provide new homes, support regeneration and future vitality and viability.
 - Supports the local economy by designating 17 strategic and locally important employment sites.
 - Promotes healthy, sustainable and cohesive local communities through good design and supporting infrastructure delivery.
 - Supports action on climate change through mitigation and adaptation measures, including facilitating active travel.
 - Protects environmental assets and sets policies to secure biodiversity net gain.
- 1.6 The objectives of the Draft Local Plan are broad and cross cutting and will contribute to a range of corporate work. The Local Plan will help deliver priorities in the 5 Year Strategy under the themes of Environment, Economy and Quality of Life. More detail is set out in section 6 of this report.

- 1.7 Responses from the consultation on the draft Local Plan (Regulation 18) and any additional evidence will be used to prepare the next version of the Local Plan, known as the Pre-Submission version (Regulation 19), which will be subject to further consultation before the Plan is submitted to the Secretary of State for independent Examination (Regulation 22). Consultation on this Draft Local Plan is therefore an important stage in seeking the views of the local community and stakeholders. The Executive are asked to agree the Draft Local Plan (Regulation 18) for an eight week period of consultation, along with consultation on an Interim Sustainability Appraisal.

2. Recommendation

2.1 The Executive is advised to RESOLVE that:

- (i) the Draft Surrey Heath Local Plan: Preferred Options (2019 – 2038) and associated Mapping booklet, attached at Annex 1 and 2, are agreed for a period of 8 weeks consultation from March to May 2022; and
- (ii) the Interim Sustainability Appraisal, attached at Annex 3, is agreed for a period of 8 weeks consultation from March to May 2022; and
- (iii) minor changes to the draft Local Plan and Mapping booklet be agreed by the Head of Planning in consultation with the Portfolio Holder for Planning and People.

3. Background and Supporting Information

Local Plan content

- 3.1 The new Surrey Heath Local Plan will provide a robust and up-to-date planning framework for future development in the Borough. It includes a vision, objectives and spatial strategy for the level and distribution of development, site allocations and a suite of development management policies.
- 3.2 The Draft Plan is informed by national planning policy and guidance, other County and local plans and strategies and a detailed evidence base on matters such as housing needs, flood risk, climate change, Gypsy and Traveller needs, climate change and future economic needs. The consultation responses from the Issues and Options consultation in 2018 have also been taken into account, and these are summarised in a background evidence document. However, there have been significant changes in national planning policy and guidance since 2018 and the current version must reflect the most up to date national guidance.

- 3.3 In preparing the draft Local Plan, consideration has been given to the considerable environmental and policy constraints that affect Surrey Heath Borough. These include the Thames Basin Heaths Special Protection Area, which affects 23% of the borough with a further 19% in the 400m buffer zone within which residential development cannot take place. Approximately half of the Borough lies within the metropolitan Green Belt and there are areas at risk of flooding and with important ecological habitats.

Housing

- 3.4 A key purpose of a Local Plan is to set out the scale and location of new homes to be built over the plan period. In determining the housing requirement for the Borough, over the period to 2038, officers have had regard to a range of evidence. The Government's standard methodology sets an annual housing need figure for Surrey Heath of 327 dwellings per annum, which over the Plan period, identifies a housing need for 6,213 new homes.
- 3.5 A number of studies have been undertaken to inform the approach to housing delivery including a Countryside Capacity Study, a Strategic Land Availability Assessment and a Housing Needs Assessment. In total 728 new dwellings have already been built in the Borough since 2019 and a further 2,424 have planning permission (as of 31/3/21). This includes, for example, the development of the former Princess Royal Barracks at Deepcut, which will provide 1,200 dwellings and which is under construction. The remaining supply will come from sites allocated for housing in the Draft Local Plan, sites identified in the Strategic Land Availability Assessment (SLAA) and 'windfall' sites¹.
- 3.6 Work undertaken on potential capacity identified that sites from within settlements and appropriate Countryside beyond the Green Belt sites, and other sources listed above, did not provide sufficient capacity to deliver the housing need set out by the standard methodology. In line with guidance in national planning policy and under the duty to co-operate, discussions were held with neighbouring authorities as to whether unmet needs could be met elsewhere.
- 3.7 The adopted Hart Local Plan sets out a commitment to deliver 41 dwellings per annum towards meeting unmet needs in Surrey Heath. Through duty to co-operate discussions Hart District Council has reconfirmed this commitment. Over the overlapping Local Plan timescales (2019 – 2032) this means that a total of 533 new homes will be delivered in Hart to meet unmet needs in Surrey Heath.

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

- 3.8 To determine the housing requirement figure for the Draft Local Plan (Regulation 18) account has been taken of environmental and planning constraints, the standard methodology local housing need figure, Housing Need Study, the Countryside Capacity Study, the SLAA and supply in the Hart Local Plan to arrive at a Local Plan housing requirement figure of 5,680 new homes. This is the minimum number of homes to be delivered in the Borough up to 2038. It is important to demonstrate that there is some flexibility in the identified supply of sites to deliver the Local Plan housing requirement, particularly at this stage in the plan making process, so the housing supply from all sources identifies a small supply buffer.
- 3.9 To demonstrate deliverability of the Draft Local Plan (Regulation 18) housing requirement the Plan identifies the potential to deliver 6,082 new homes, as set out in Table 1 below. A significant proportion of new homes will be located within Camberley town centre contributing to future regeneration proposals. Completions are new homes that have already been built and commitments are homes that are either under construction or which have planning permission. Table 2 sets out the sites that are specifically allocated for residential development in Policy HA1 in the Draft Local Plan. In addition, the following strategic sites are allocated and are subject to specific Draft Local Plan policies:
- Mindenhurst (former Princess Royal Barracks) – 1,200 new homes (some already completed/under construction);
 - London Road Block – approximately 550 new homes and other town centre uses;
 - Land East of Knoll Road – approximately 475 new homes.

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

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	Number of dwellings (net) per source of delivery			
Location	Completions	Commitments	SLAA	Total
West of the Borough				
Bagshot	48	236	134	418
Camberley	218	498	1,491	2,207
Deepcut	118	1113	138	1,369
Frimley	51	107	215	373
Frimley Green	0	23	177	200
Mytchett	8	254	23	285
Total	443	2,231	2,178	4,852
East of the Borough				
Bisley	0	0	32	32
Chobham	52	14	114	180
Lightwater	1	2	17	20
West End	220	20	96	336
Windlesham	12	173	36	221
Total	285	209	295	789
Non-Spatial				
Windfall Allowance	-	-	457	457
Lapse-Rate	-	-16	-	-16
Total	728	2,424	2,967	6,082

Table 2 – Site Allocations for residential uses in Policy HA1

Policy Reference	SLAA Site ID	Site Name / Address	Number of homes allocated (net)
HA1/01	181	134 and 136 London Road, Bagshot	26
HA1/02	247	Bagshot Depot and Archaeology Centre, London Road, Bagshot, GU19 5HN	50
HA1/03	921	Land East of Park Street, North of Princess Way (former House of Fraser)	120
HA1/04	865	84-100 Park Street, Camberley	61
HA1/05	240	Camberley Centre, France Hill Drive, Camberley, GU15 3QG	35
HA1/06	25	Camberley Station, Station House, Pembroke Broadway	75
HA1/07	833	York Town Car Park, Sullivan Road, Camberley	27
HA1/08	552	Land at Frimhurst Farm, Deepcut Bridge Road, Deepcut	65
HA1/09	907	Sir William Siemens Square, Chobham Road, Frimley	200
HA1/10	557	Land west of Sturt Road, Frimley Green	160
HA1/11	178	Land east of Benner Lane (partial Housing Reserve Site), West End	73
HA1/12	177	Housing Reserve Site, East of Heathpark Drive, Windlesham	116
HA1/13	447	Chobham Rugby Club, 50 Windsor Road, Chobham, GU24 8LD	91

Table 2 continued – Site Allocations for C2 Development (Residential Institutions) in Policy HA1

Policy Reference	SLAA Site ID	Site Name / Address	Number of homes allocated (net)
HA1/14	801	Pinehurst, 141 Park Road, Camberley	44 (C3 Equivalent)

Gypsies and Travellers and Travelling Showpeople

- 3.10 The Council has a responsibility through the National Planning Policy Framework and other legal requirements to assess and plan for the housing needs of all residents, including the Gypsy and Traveller community. A Gypsy and Travellers and Travelling Showpeople Study prepared to support the Draft Local Plan shows a need for at least 32 pitches for Gypsies and Travellers and 14 plots for Travelling Showpeople over the plan period. Following the granting of planning permission for two pitches on a site to the South of the M3 junction in Lightwater, the outstanding need is for 30 pitches.
- 3.11 A number of options have been explored to identify sufficient sites to meet this need. However, this is challenging given the limited availability of land to deliver pitches and plots, in addition to the environmental and policy constraints in the Borough. At this point in time the Draft Local Plan does not include sites to meet all of the identified need. One specific site allocation for 4 pitches is identified at Diamond Ridge Woods on the edge of the Old Dean and is included as a site allocation in Policy H12. A further call for sites for Gypsy and Traveller and Travelling Showpeople accommodation will take place alongside the Draft Local Plan consultation and other site opportunities will be investigated further. An additional consultation on Gypsy and Traveller and Travelling Showpeople sites is programmed to take place in Summer 2022. This additional consultation event is included in the revised Local Development Scheme timetable for producing a new Local Plan, as detailed in that Executive report.

Employment and Retail

- 3.12 Evidence prepared for the draft Local Plan suggests that there are a range of different economic forecasts that can be used to determine how much employment land is needed in the Borough over the plan period. Using the lower range forecasts, evidence suggests that employment land requirements can be met from existing land supply and redevelopment of older stock. The Draft Local Plan identifies the most important employment sites as either strategic or locally important employment sites and seeks to protect them for employment uses where planning permission is required.

- 3.13 Evidence on town centre uses suggests that there is no need for additional retail floorspace in the Borough in addition to existing commitments and vacant floorspace and having regard to the changing way in which people shop and the growth of internet shopping. Camberley town centre will continue to be the focus for town centre uses along with the District and Local Centres, and the neighbourhood parades will continue to serve an important local function. As set out previously, a significant increase in the number of new homes in Camberley town centre is proposed.

Green Belt

- 3.14 The Draft Local Plan sets out that the current extent of the Green Belt will be maintained with the exception of the inseting of Chobham Village. No Green Belt sites are allocated for residential development in the Draft Plan, although a number of sites were submitted by landowners/developers for consideration, including a proposal for a larger scale development at Fairoaks. There is an assumption that some redevelopment of small brownfield sites in the Green Belt will take place to provide new homes over the Plan period.
- 3.15 National policy states that Green Belt boundaries should only be amended in exceptional circumstances and highlights the need to promote sustainable patterns of development when reviewing boundaries. The options of including in the Plan either a number of smaller Green Belt sites or a larger scale development for Fairoaks for housing were assessed through the Sustainability Appraisal process. However, in line with national policy, capacity from other sources of supply in the Borough, along with provision for some unmet needs to be met from Hart District does not warrant the need for sites in the Green Belt to be released for housing. Policies for the Green Belt follow national planning guidance with development being strictly limited.
- 3.16 Historically Chobham village has been ‘washed over’ by the Green Belt. However, since the last review of the Green Belt boundaries in 1987 there have been changes to national planning policy regarding the approach to designation of settlements within the Green Belt. Two broader Green Belt Studies have prepared to support the Local Plan, a Green Belt and Countryside Study, 2017 and a Surrey Heath Green Belt Review 2022, and in addition a specific Chobham Village Green Belt Study was undertaken. The Chobham Village Green Belt Study concluded that much of the settlement does not exhibit an open character and does not contribute significantly to the openness of the Green Belt. Combined with changes in national policy, the Draft Local Plan therefore includes the inseting of Chobham Village from the Green Belt.

Environment and Sustainability

- 3.17 A key objective of the Draft Local Plan is protection of the Borough's extensive environmental assets through a broad range of policies. This includes protection of the Thames Basin Heaths Special Protection Area and other areas of biodiversity and geodiversity, as well as securing biodiversity net gain and protecting greenspaces.
- 3.18 Policies in the Draft Local Plan promote sustainability and seek to ensure that new developments contribute to climate change mitigation and adaptation. This includes helping to reduce carbon emissions by measures including low/zero carbon design, improved energy efficiency, promoting sustainable modes of transport and supporting green infrastructure. Policies also support climate change adaptation and healthy living through good design.

Development Management Policies

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

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

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

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

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

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

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

Sustainability Appraisal

- 3.20 An Interim Sustainability Appraisal (SA) has been prepared to support the Draft Local Plan and is attached at Annex 3. In line with statutory requirements, it will also be subject to consultation. The purpose of the SA is to ensure that the Plan contributes to sustainable development and to assess different reasonable alternative approaches to the scale and location of future development as well as realistic policy options against a set of Sustainability objectives. The findings of the SA support the approach set out in the Draft Local Plan. Sustainability Appraisal is an iterative process and will continue to inform the next stages of the Local Plan.

Background evidence

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

- Habitat Regulation Assessment
- Strategic Land Availability Assessment
- Housing Needs Assessment
- Countryside Capacity Assessment
- Climate Change Study
- Greenspaces Background Paper
- Infrastructure Delivery Plan
- Strategic Flood Risk Assessment
- Employment Land Technical Update Paper
- Gypsy and Traveller and Travelling Showpeople Accommodation Assessment
- Green Belt Review
- Chobham Village Study
- Landscape Study
- Town Centre Uses and Future Directions Study

Further evidence will be required to inform the preparation of the next version of the Local Plan, known as the Pre-Submission Local Plan (Regulation 19). This will include a full Transport Assessment, Air Quality Assessment and Whole Plan Viability Study. In addition, further work on a corporate Camberley Town Centre Strategy will inform the next version of the Local Plan.

Consultation

3.22 Consultation is proposed on the Draft Plan between 14 March and 9 May 2022. Consultation must be consistent with the principles set out in the adopted Statement of Community Involvement and in summary will comprise:

- Notification to all those on the Planning Policy database (includes statutory consultees)
- Information on the Councils website including dedicated consultation site
- Information in libraries and at Parish Council offices
- Article in Heathscene to be distributed in March
- Public exhibitions
- Online information sessions

4. Reasons for Recommendation

- 4.1 It is important that the Council has an up-to-date and robust planning framework to guide development which reflects current national policy and guidance. An up to date Local Plan ensures that the Council can guide development to the most appropriate locations rather than reacting to developers proposals and risking the loss of planning appeals.
- 4.2 The Government is clear that local authorities should have an up to date Plan in place by December 2023 or risk Government intervention. The revised Local Development Scheme, set out elsewhere on this Agenda, sets out the timetable for the remainder of the Local Plan preparation process.
- 4.3 The process for preparing Local Plans is set out in Regulations². These require that the Local Plan is prepared in consultation with the local community and other stakeholders. The proposed consultation will allow continued engagement and comments received will help inform the content of the next version of the Local Plan.
- 4.4 The timetable for producing a Local Plan must be set out in a document called a Local Development Scheme (LDS), details of which are set out in another item on this agenda. A draft LDS was considered and supported by the Local Plan Working Group in January 2022.

5. Proposal and Alternative Options

- 5.1 The available options for the Executive to consider are:
- i. to approve the draft Surrey Heath Local Plan: Preferred Options, Mapping booklet and Interim Sustainability Appraisal as set out in Annexes 1, 2 and 3 of this report; or
 - ii. to approve the draft Surrey Heath Local Plan: Preferred Options, Mapping booklet and Interim Sustainability Appraisal as set out in Annexes 1, 2 and 3 of this report with changes; or

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

- iii. to not agree the draft Surrey Heath Local Plan: Preferred Options, Mapping booklet and Interim Sustainability Appraisal as set out in Annexes 1, 2 and 3 of this report.

6. Contribution to the Council's Five Year Strategy

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

- i. **Environment** – enhance and improve access to the Borough's green spaces and natural environments for the enjoyment of generations to come, balancing our commitments to housing delivery and economic growth.
- ii. **Environment** – tackle Climate Change, working with communities and partners.
- iii. **Health & Quality of Life** – provide infrastructure that would support our ambition to ensure everyone can access a safe, quality home to meet their needs.
- iv. **Economy** – invest in our towns, villages and communities, supporting our existing businesses and attracting new ones.
- v. **Economy** – work with partners to improve to the Borough's infrastructure.
- vi. **Effective & Responsive Council** – advocate on behalf of our community on issues outside our direct control.

7. Resource Implications

7.1 There are no immediate resource implications arising beyond those allowed for within current budgets. Resources will be needed in the following two financial years to deliver the Local Plan and these will be sought through the usual budget setting process.

8. Section 151 Officer comments

8.1 There are no direct additional budgetary implications arising from this report outside of existing budgets, with the exception of potential legal counsel cost in the next financial year, and a budget bid has been made to cover this. Whereas the local plan will involve a draw on Council budgets once approved, this is likely to be considerably less than the potential cost of not having a local plan.

9. Legal and Governance Issues

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

10. Monitoring Officer Comments

10.1 No matters arising.

11. Other Considerations and Impacts

11.1 No matters arising.

12. Environment and Climate Change

12.1 The Council has a statutory duty to ensure that its Local Plan contributes to tackling climate change. In order to support policies in the Local Plan a Climate Change Study has been prepared. This has supported the development of policies in the Draft Local Plan which seek to ensure that new developments contribute to climate change mitigation and adaptation and contribute to meeting the Councils overall targets for climate change. The Draft Local Plan also includes policies seeking to protect the natural environment including the requirement for biodiversity net gains on new developments. Local Plan policies will also assist in the delivery of the Climate Change Action Plan.

13. Equalities and Human Rights

13.1 The draft Local Plan is accompanied by an Equalities Impact Assessment which will be updated as the Plan progresses.

14. Risk Management

14.1 The Local Development Scheme identifies the risks to meeting the Local Plan milestones and sets out some mitigation to each risk. Of note are that the Draft Local Plan does not yet include sufficient Gypsy and Traveller sites to meet the needs identified in the technical background evidence and a further consultation on this issue will therefore be needed in the Summer 2022, and will need to be addressed before the Plan can be submitted for Examination. In addition, the date for submission of the Plan to the Secretary of State for independent examination is now later than previously proposed. The timetable for Examination and the receipt of the Inspectors Report prior to the adoption of the Plan by December 2023 will be challenging, although this part of the process will be the responsibility of the Planning Inspectorate rather than the Council.

14.2 The Government is also proposing changes to planning policy and legislation although at this time the extent and exact timing of these is not known and will need to be monitored as the plan progresses.

15. Community Engagement

- 15.1 The Draft Local Plan will be subject to a period of 8 weeks consultation as set out in the Recommendation in this report. This will be undertaken in line with relevant legislation and the Councils adopted Statement of Community Involvement.

16. Annexes

- 16.1 Annex 1 – Draft Surrey Heath Local Plan: Preferred Options (2019 – 2038)
- 16.2 Annex 2 – Draft Surrey Heath Local Plan: Preferred Options Mapping Booklet
- 16.3 Annex 3 – Interim Sustainability Appraisal and Non-Technical Summary

17. Background Papers

- 17.1 Background evidence that has been produced to support the Local Plan can be found on the Councils evidence page at <https://www.surreyheath.gov.uk/residents/planning/planning-policy/evidence-base>
- 17.2 National Planning Policy Framework, 2021 - <https://www.gov.uk/government/publications/national-planning-policy-framework-2>

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Draft Surrey Heath Local Plan: Preferred Options (2019 – 2038)

Regulation 18 Consultation Version



March 2022

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Foreword

- 1.1. In Surrey Heath, we are fortunate to live in an attractive environment with a good quality of life. We are preparing a new Surrey Heath Local Plan which will guide development in the Borough up to 2038. This will ensure that we can meet future development needs whilst protecting and enhancing the environmental and community assets that are valued by our residents. In having an up-to-date Local Plan in place we have greater control over what type and quality of development takes place and where it is located.
- 1.2. This Draft Local Plan sets out draft planning policies and site allocations that will set the planning framework for the type and location of new homes to be built, the protection of employment sites and the enhancement of our town, village and local centres. This will be alongside the protection of the Green Belt, countryside and important ecological and heritage assets, with new development delivering enhancements to biodiversity and high quality design that takes into account the need to reduce our carbon emissions. Inherent in our policies is the need to protect and enhance the important qualities of our individual communities across the Borough recognising both the need for regeneration within Camberley town centre, and the valuable contribution that our rural communities make to quality of life in the Borough.
- 1.3. More specifically, the Local Plan supports the delivery of about 6,000 new homes in the Borough, many of which already have planning permission. This will include a high proportion of much needed affordable homes. The focus for new homes is in Camberley town centre and in the west of the Borough, with continued support for the current development at Mindenhurst for 1,200 homes.
- 1.4. This is an early stage in the Local Plan process and I would strongly recommend that you take the time to comment on this Draft Local Plan, and influence the development of our future planning policies. Further details on how to get involved are set out in the next section of this Plan.
- 1.5. All comments received will be used to inform a further version of the Local Plan which will be subject to a further round of public consultation.
- 1.6. Finally, I would like to thank the Chair and all of the members of the cross-party Local Plan Working Group for the time and commitment they have put in to the preparation of this Draft Local Plan.

Councillor Alan McClafferty
Leader of the Council



How to Get Involved

- 1.7. Surrey Heath Borough Council is preparing a new Local Plan which will guide the location, scale and type of future development in the Borough up to 2038. This document provides an opportunity to take part in its preparation.
- 1.8. Through this Draft Surrey Heath Local Plan: Preferred Options consultation document we are seeking your views on key planning issues for the Borough and the options that could help us address them. The draft Plan sets out detailed draft planning policies and site allocations for your comments. We are interested to hear from everyone interested in planning and development in Surrey Heath, including residents, businesses, community groups and all other interested stakeholders.
- 1.9. In addition to the preferred options set out in the Draft Local Plan you can also suggest any issues or options you feel are missing. You are welcome to comment on every part of the document or just the topics that you are specifically interested in. The consultation aims to capture your views on the key planning issues and preferred options for the spatial strategy and development management policies for Surrey Heath Borough. This is sometimes referred to as a Regulation 18 consultation¹.
- 1.10. Figure 1 of this document shows the further opportunities to comment as the Surrey Heath Local Plan (2019 – 2038) progresses. In addition, our Local Development Scheme (LDS)² sets out the detailed timetable for the development of the Local Plan and provides further information on the consultation stages.
- 1.11. What you tell us during this consultation will help us to develop the best planning and development management policies for Surrey Heath Borough. We would encourage you to get involved.
- 1.12. The Council has also prepared a booklet of mapping changes that would be made to the existing Local Plan Policies Map as a result of policies in this Draft Plan. The Plan is also supported by a number of evidence base documents and an Interim Sustainability Appraisal which is also available for comment. Further information on these is set out in Section 1 of this Plan.

¹ Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012 - 'Preparation of a Local Plan'.

² Available online at: www.surreyheath.gov.uk/residents/planning/planning-policy/planning-and-supplementary-planning-documents/local-development.



About this Consultation

- I.13. The Draft Surrey Heath Local Plan: Preferred Options (2019 – 2038) document is available for public consultation between **12:00 noon on 14 March 2022** and **12:00 noon on 09 May 2022**.
- I.14. You can submit your feedback online by completing the comments form at:
I. XXX.
- I.15. A summary of the plan, with an option to submit feedback, can be found online at:
I. XXX.
- I.16. Alternatively, you can email your comments to: planning.consultation@surreyheath.gov.uk.
- I.17. If it is not possible to use electronic communication, send your comments by post to:
Planning Policy
Finance and Customer Services Directorate
Surrey Heath Borough Council
Surrey Heath House
Knoll Road
Camberley
Surrey GU15 3HD
- I.18. In your response, please highlight which Policy, Section, and Paragraph(s) you are referring to.
- I.19. The Draft Local Plan, alongside all supporting evidence-base documents, can be viewed online at <https://www.surreyheath.gov.uk/residents/planning/planning-policy>. Documents can also be viewed on paper at the Council's Offices in Knoll Road Camberley upon request. The Draft Local Plan and key supporting documents can also be viewed in libraries throughout the Borough. Information on events taking place as part of the Local Plan consultation can be found online at: https://apps.surreyheath.gov.uk/apps/local_plan/.
- I.20. Please return your comments to Surrey Heath Borough Council by **12:00 noon on 09 May 2022**.

Data Protection

- I.21. Any personal details submitted as part of a representation will be processed by Surrey Heath Borough Council in accordance with the General Data Protection Regulations (GDPR) and the Data Protection Act 2018 and used only in connection with the development and adoption of the Surrey Heath Local Plan.



- 1.22. Please note that the Council will not accept anonymous, abusive or defamatory comments. Comments cannot be treated as confidential and your name, organisation and response will be made publicly available once we publish responses. Further detail on how your personal information will be managed is available on the Local Plan consultation webpage and more general information about how the Council manages your data can be found at <https://www.surreyheath.gov.uk/council/information-governance/how-we-use-your-data>.



I. Introduction and Context

Introduction

- I.23. Surrey Heath Borough Council is preparing a new Local Plan which will guide the location, scale and type of future development in the Borough up to 2038. The Plan will support the provision of new homes and appropriate infrastructure, the protection of employment sites and the vitality of our town, district and local centres. Policies in the Local Plan will also protect those aspects of the Borough which are valued by local people and contribute to its character, including the Green Belt, open spaces and historic assets.
- I.24. Planning Regulations state that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise. Once adopted, the policies within the Surrey Heath Local Plan, together with any made neighbourhood plans, will be the framework against which any planning applications in the Borough will be assessed.

Why are we preparing a new Plan?

- I.25. Surrey Heath Borough Council as a Local Planning Authority is required, in line with Government legislation and guidance, to prepare, and maintain, an up-to-date Local Plan. Planning policies guiding development in Surrey Heath are currently contained in a number of documents including the Camberley Town Centre Area Action Plan, 2014, the Core Strategy and Development Management Policies 2012, and saved policies from the 2000 Surrey Heath Local Plan.
- I.26. Since these documents were prepared, there have been changes to Government planning policy and legislation that mean our policies need to be reviewed to ensure that they are up to date. This means that the policies will have the most weight in making planning decisions.
- I.27. The Surrey Heath Local Plan, once adopted, will replace the documents referenced above.
- I.28. In June – July 2018 the Council consulted on a Draft Local Plan Issues and Options/Preferred Options document. Since this consultation the Government has issued revised national planning policy, most recently a revised National Planning Policy Framework in July 2021. A further consultation on Draft Policies and site allocations is therefore being undertaken to ensure that the Council has a robust planning strategy in line with current national planning policy and guidance. The responses to the 2018 Draft Plan consultation have been used to help inform this 2022 version of the Draft Plan. Further information on the outcome of this consultation is set out in the Context Section of this Plan.



What happens next?

- 1.29. This is not the final stage of the Local Plan but an early stage in the process. Your comments, and the completion of further pieces of evidence including a Transport Assessment and Viability Assessment, will be used to inform the next version of the Local Plan known as the Pre-Submission version, also known as the Regulation 19 (Publication) stage of the Local Plan process. Following further consultation on the Pre-Submission Plan, the Plan and associated representations and evidence will be submitted to the Secretary of State for independent examination.
- 1.30. The timetable for preparing the next stages of the Local Plan is set out below and can be found in more detail at: <https://www.surreyheath.gov.uk/residents/planning/planning-policy/planning-and-supplementary-planning-documents/local-development>.

Table 1 – Local Plan timetable

Stage	Dates
Draft Local Plan Consultation	This stage
Interim Sustainability Appraisal Consultation	14 March to 9 May 2022
Pre-Submission Consultation on the Local Plan Consultation on the Sustainability Appraisal	January to February 2023
Submission of the Plan and supporting evidence to the Secretary of State for Examination	June 2023
Local Plan Examination (Hearing sessions)	August 2023
Local Plan Adoption	December 2023

Further Information:

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

Copyright Statement

- 1.32. The following copyright statement applies to all maps featured in this document;

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Local Plan Context

- 1.33. In preparing a new Local Plan, the Council has to have regard to national, regional and local policies, plans and strategies as well as relevant legislation³. Policies and allocations must also reflect the local evidence base that is prepared to support the Plan. Where appropriate, links to relevant evidence base studies and other policies and strategies are provided within this document. The evidence base can be viewed at <https://www.surreyheath.gov.uk/residents/planning/planning-policy/evidence-base> and in hard copy at the Council offices at Knoll Road, Camberley during normal office hours. In addition to technical evidence on issues such as Climate Change, flooding, housing and employment, the evidence base also includes a number of Topic Papers which the Council has prepared, setting out further background to the draft policies and allocations.
- 1.34. At the end of 2020, the Council undertook what is known as a 'Call for Sites'. This invited anyone with an interest in land, potential sites and broad locations for development to submit these to the Council for consideration for inclusion within the new Local Plan. The information provided through the 'Call for Sites' as well as an analysis of development opportunities by the Council using other sources of information has been used to inform the identification of sites which the Council considers are suitable for allocation within this new Local Plan.
- 1.35. This Draft Plan has been prepared over the period of the Covid-19 pandemic. As yet, it is not known what the longer-term effects might be on the way people live, work, shop and travel in the Borough. For example, the trend toward online shopping has been accelerated and seems likely to continue, but it is difficult to predict to what extent people will return to town centres for shopping. Following the close of consultation on this draft Plan the evidence base will be reviewed to determine if updates are needed to reflect changes as a result of the pandemic.
- 1.36. A summary of the key considerations that the Council has taken into account in preparing the Draft Local Plan, in addition to the local evidence base, are set out below.

³ Including the Planning and Compulsory Purchase Act 2004, the Localism Act 2011 and the Town and Country (Local Planning) Regulations 2012.



Previous Draft Local Plan Consultation, 2018

- 1.37. As set out in the introduction, the Council consulted on a Draft Local Plan Issues and Options/Preferred Options document in June/July 2018. That draft Plan covered the period up to 2032 and sought views on a range of Policy approaches and allocations. A total of 335 separate individuals or organisations responded to the draft Plan. A summary of comments and the Council's response to those can be viewed on the Local Plan evidence page.
- 1.38. This draft version of the Local Plan has developed the Policy approaches set out in the 2018 consultation further and now includes detailed policy wordings for comment as well as identifying the Council's preferred sites for housing and other uses. The plan period has been extended and now runs until 2038.

National Planning Policy and Guidance

- 1.39. Government planning policy is set out in the National Planning Policy Framework⁴ (NPPF) 2021, and Planning Policy for Traveller Sites (2015). The NPPF sets out national planning policy on topics such as housing and employment needs, town centres, the natural and historic environments and on development within the Green Belt. The NPPF sets out a presumption in favour of sustainable development and local planning authorities are expected to plan positively for the needs of their area. The local plan must be in conformity with policies in the NPPF and this will be tested by an Inspector during the Local Plan Examination.
- 1.40. The NPPF is supported by on-line National Planning Practice Guidance⁵ (NPPG) which details out more fully how the government expects national planning policy to be implemented.

Saved Regional Guidance

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

⁴ Available online at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>.

⁵ Available online at: <https://www.gov.uk/government/collections/planning-practice-guidance>.



Local Enterprise Partnership

- 1.42. The Borough is part of the Enterprise M3 Local Enterprise Partnership (EM3 LEP) and must therefore have regard to the strategic growth ambitions for the LEP area set out in the Strategic Economic Plan 2018 – 2030 (SEP)⁶ and emerging Local Industrial Strategy (LIS)⁷. Camberley is identified by the LEP as a ‘Step-up Town’ which is an area of latent economic potential and which currently experiences barriers to growth that impact upon the performance of the Enterprise M3 area. Some of the work that has been undertaken to date on the LIS highlights the regional importance of Camberley and Frimley as both population and employment centres.

County wide Plans and Strategies

- 1.43. Surrey Heath Borough lies in a two-tier authority area and Surrey County Council therefore delivers many of the services which support our communities. These include the provision of school places as Local Education Authority and of highway safety and improvement measures in its role as Highway Authority. The County Council is also responsible for Minerals and Waste Planning and a new Surrey Waste Local Plan 2019 – 2033 was adopted in December 2020. This will be replaced by a Joint Surrey Minerals and Waste Local Plan to be prepared between 2021 and 2024.
- 1.44. The Surrey Heath Local Plan will need to support and help to deliver plans and strategies relating to the services delivered by the County Council. These include the Surrey Local Transport Plan 2011 – 2026 (being replaced by Local Transport Plan 4 2022 - 2032) and the School Organisation Plan 2020 – 2030.

Surrey Heath Plans and Strategies

- 1.45. The Local Plan should also support the delivery of other plans and strategies produced by the Borough Council. These include the Council’s Five Year Strategy 2022 - 2027⁸ which is set out under the themes of:
1. Environment
 2. Health and Quality of Life
 3. Economy
 4. Effective and Responsive Council

⁶ The SEP can be viewed at <https://www.enterprisem3.org.uk/sites/default/files/2020-02/Strategic%20Economic%20Plan%202018.pdf>.

⁷ Available online at: <https://www.enterprisem3.org.uk/local-industrial-strategy>.

⁸ Available online at: <https://www.surreyheath.gov.uk/council/about-council/five-year-strategy>.



- 1.46. Local Plan policies will play a significant role in meeting the aims set out under each of these themes. This includes, for example, the protection and enhancement of green spaces and biodiversity, policies and allocations relating to the delivery of new homes and to affordable housing and the requirement for appropriate infrastructure alongside new development. Other Borough wide plans and strategies relevant to the Local Plan include the Surrey Heath Economic Development Strategy 2020⁹, the Surrey Heath Borough Annual Plan¹⁰ and the annual Infrastructure Funding Statement¹¹.
- 1.47. In preparing the new Local Plan, consideration has also been given to which policies from the existing Local Plan in the Core Strategy and Development Management Policies 2011 – 2028 and the Camberley Town Centre Area Action Plan 2011 – 2028 should be carried forward, reviewed or replaced.

Neighbourhood Plans

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

Cross boundary working

- 1.49. The Council is required to work with other local authorities and organisations on strategic cross boundary planning issues under a legal ‘duty to co-operate’. These issues include those related to housing, employment, transport and the Thames Basin Heaths Special Protection Area.

⁹ Available online at: <https://www.surreyheath.gov.uk/business/economic-development/economic-development-strategy>.

¹⁰ Available online at: <https://www.surreyheath.gov.uk/sites/default/files/documents/council/Final%20Annual%20Plan%202021.22.pdf>.

¹¹ Available online at: <https://www.surreyheath.gov.uk/sites/default/files/documents/residents/planning/Infrastructure%20Funding%20Statement%202019-20%20Final.pdf>.



- 1.50. Surrey Heath lies within a Housing Market Area and Functional Economic Area with Hart District Council and Rushmoor Borough Council. The Rushmoor Local Plan 2014 – 2032 was adopted in February 2019 and the Hart Local Plan 2014 – 2032 in April 2020. Specific discussions on meeting unmet housing needs have been undertaken with Hart and Rushmoor Councils as set out in more detail in the supporting text to Policy SS1: The Spatial Strategy.
- 1.51. The duty to co-operate is an ongoing process and engagement with relevant duty to co-operate bodies has informed this version of the Plan. The Council has produced a Duty to Co-operate Compliance Statement alongside the draft Local Plan which sets out the duty to co-operate engagement and outcomes to date. Draft Statements of Common Ground relating to cross boundary issues have also been prepared with some key duty to co-operate partners and can be viewed on the Local Plan evidence webpage.

Sustainability Appraisal

- 1.52. The Strategy and policies in the Local Plan must contribute to the delivery of sustainable development. This is assessed by undertaking a Sustainability Appraisal (SA). Reasonable alternative policy options (where they exist) have been tested against a set of social, environmental and economic objectives. An Interim SA has been prepared to inform this version of the Local Plan and builds on the Interim SA undertaken alongside the 2018 version of the Local Plan.
- 1.53. The Interim SA, 2022 is subject to a eight week consultation alongside this Draft Local Plan and can be viewed from the Local Plan webpage.

Habitat Regulation Assessment

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



- I.56. Further work on air quality will be undertaken prior to the next stage of the Local Plan and alongside the Transport Assessment. This will inform a further version of the HRA as well as the next version of the Local Plan.

Climate Change

- I.57. The Council has a statutory duty to ensure that its policies contribute to tackling climate change.
- I.58. In May 2019 the Government declared a climate change emergency and in June of that year the Climate Change Act was amended to set a new emissions target for the UK of net zero greenhouse gases by 2050. In October 2019, Surrey Heath Borough Council declared a Climate Change emergency and committed to become carbon neutral across its own estate and operations by 2030 and subsequently adopted a Climate Change Action Plan. To ensure that the Local Plan policies take proper account of climate change, the Council commissioned a Climate Change Study to inform the Plan. This can be viewed in the Local Plan evidence base.

Health

- I.59. The built and natural environment can have a significant influence on health and wellbeing. The design and location of new development can influence physical activity levels, travel patterns, social connectivity, and mental and physical health. Good health is also linked to quality of housing and opportunities for employment as well as access to leisure, culture and green spaces.
- I.60. Policies in this Plan will collectively contribute to improving health and wellbeing. This includes the requirement for a Health Impact Assessment for certain developments; ensuring there is an appropriate supply of employment land and premises to meet future employment needs; ensuring a continuing supply of housing to meet future local needs; protection and enhancement of green infrastructure; encouraging the use of sustainable travel modes as well as minimising pollution. Policies also ensure the delivery of appropriate infrastructure (including health) alongside new development and the Plan has a specific Policy supporting Frimley Park Hospital.

Monitoring and Review

- I.61. In order to assess whether the Local Plan is delivering the Vision and Objectives set out later in this Plan, appropriate monitoring mechanisms need to be in place. Section 10 sets out a monitoring framework which will be reported through the annual Authorities Monitoring Report. This will include monitoring the delivery of new homes and amount of employment and retail floorspace.



- 1.62. The Council is required to review the Local Plan every five years from adoption. Section 10 of this Plan also sets out the circumstances whereby a review may be needed earlier than this because of other factors, such as significant changes to national policy or where targets in the Local Plan are not being met, such as the number of new homes being built.

Spatial Portrait

About Surrey Heath Borough

- 1.63. The following Section sets out a brief overview of the Borough's geography and physical and social characteristics. This information is largely taken from the Local Plan evidence base¹² and from published statistics which are referenced as appropriate. Further baseline information can also be found in the Interim Sustainability Appraisal and further detail on individual towns and villages in the Borough is set out in the Local Area Profiles in Section 9 of this Plan.

Geography and wider context

- 1.64. Surrey Heath lies in the north west corner of Surrey and adjoins the counties of Berkshire and Hampshire. The north and east of the Borough are mainly areas of countryside and heathland which give the Borough its name. In total, the Borough covers an area of some 9,507 hectares and has a population of 89,200¹³. Nearly half of the Borough is designated as Green Belt.
- 1.65. The western half of the Borough contains the majority of housing in the Borough and is mainly urban in character. It comprises Camberley and Frimley linked to the villages of Bagshot, Frimley Green, Mytchett and Deepcut. The eastern half of the Borough is mostly countryside of which a significant proportion is Green Belt. It includes the larger villages of Bisley, Lightwater, West End and Windlesham, (including Snows Ride) and the smaller village of Chobham.

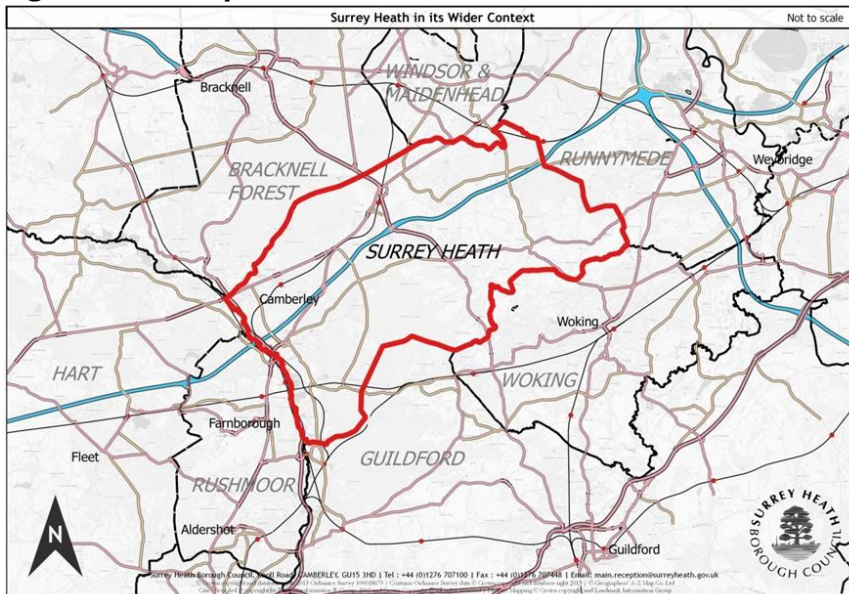
¹² Available online at: <https://www.surreyheath.gov.uk/residents/planning/planning-policy/evidence-base>.

¹³ ONS 2020 mid year population estimates.



- 1.66. The Borough lies within the Enterprise M3 Local Enterprise Partnership (EM3 LEP) area which stretches from the New Forest in the south to the perimeter of Heathrow Airport in the north. Camberley is the key population, retail, commercial and employment centre in the Borough and is identified as a Step-up town within the Strategic Economic Plan¹⁴ for the LEP area, i.e. as a town with latent economic potential experiencing current barriers to economic growth. Recent work on a Local Industrial Strategy for the LEP¹⁵ has identified both Camberley and Frimley as having an important role as population and employment centres within the LEP area.
- 1.67. Surrey Heath lies within the Blackwater Valley, comprising authorities from parts of Berkshire, Hampshire, and Surrey based along the A331 Blackwater Valley Road and River Blackwater. There are important economic and functional relationships between the main urban settlements which together form the Blackwater Valley area and Camberley forms one of the largest towns in the Valley.
- 1.68. The Borough also lies within a Housing Market Area and Functional Economic Area with Hart District and Rushmoor Borough. Major towns around the Borough include Bracknell (14km), Guildford (26km), Reading (27km) and Woking (17km).

Figure 1 – Surrey Heath in its Wider Context



¹⁴ Available online at: <https://www.enterprisem3.org.uk/sites/default/files/2020-02/Strategic%20Economic%20Plan%202018.pdf>.

¹⁵ Available online at: https://www.enterprisem3.org.uk/sites/default/files/2020-02/EM3%20Towns%20Study%20Final%20Report%20v4.0%20Part%201%20Data%20and%20Classification%2020.1.19_0.pdf.



History

- 1.69. In the east of the Borough, small early settlements such as Bagshot began to develop with the growth of the coaching routes from London. Other villages in the east of the Borough on better soils, e.g. Chobham, were farming hamlets. In the 19th century, horticulture developed on the well-drained soils in the east and south of the Borough.
- 1.70. Historically the area around Camberley was part of the open heathland surrounding the village of Frimley. In the 19th century the poor soils of the heathland were planted up for forestry, giving the Borough a wooded identity; this resulted in Surrey Heath being identified by the Bluesky National Tree Map as having the highest density of tree cover in England and Wales in 2014. Data in 2019 from the Office of National Statistics (ONS) suggests that 31% of Surrey Heath is covered by woodland¹⁶. With the establishment of the Royal Military College in 1812, the areas of Cambridge Town and Yorktown grew up to serve it, ultimately forming Camberley. A new rail station and link to London was constructed in 1878.
- 1.71. Camberley is therefore a relatively recent settlement. Since the 1950's the town has gradually merged with Frimley, Frimley Green and Mytchett to form a large linear urban area. Although the town centre is shaped by its Victorian origins, its urban form and buildings reflect the redevelopment the town has experienced since the 1960s. Its Victorian heritage and buildings are still evident on the High Street and along London Road (A30). The development of The Square shopping centre in 1990s and the more recent development of The Atrium has resulted in the loss of further areas of Victorian and Edwardian housing.
- 1.72. Much of the housing development in the Camberley/ Frimley area occurred during the 1970's and 80's, when this area was identified as part of a major growth area in the South East. This growth can be seen in areas such as Heatherside. The villages in the east of the Borough have largely retained their historic character, although all took some growth during the 1970's and 80's.
- 1.73. The first small-scale industrial areas moved to Camberley in the 1930's. Subsequently industrial development occurred at Yorktown and Frimley. The traditional manufacturing industries have now largely given way to Information and Technology based industries with strong linkages to the Blackwater Valley and Thames Valley economies.

¹⁶ Available online at:

www.ons.gov.uk/economy/environmentalaccounts/articles/carbondioxideemissionsandwoodlandcoveragewhereyoulive/2021-10-21.



- 1.74. A number of heritage assets reflect the past development of the Borough. There are over 180 statutory Listed Buildings or structures in Surrey Heath including one Grade I building. Bagshot Park and Frimley Park are Grade II listed Parks and Gardens. There are about 200 locally Listed Buildings and structures and 14 areas of High Archaeological Potential.
- 1.75. There are nine Conservation Areas in the Borough including the Basingstoke Canal which enters Surrey Heath from Ash Vale in Guildford Borough, runs from Mytchett through to Deepcut and back into Guildford Borough at Pirbright.

Population and Housing

- 1.76. In terms of its demographic and socio-economic profile the Borough is characterised by an ageing population. This presents future challenges for housing, health, employment and social support.
- 1.77. The Local Housing Needs Assessment, 2020 identifies growth of approximately 13.7% in total population over the period to 2040 and an increase in total households of 19%. The greatest proportional growth is expected in older persons with numbers of households headed by someone over 85 forecast to increase by 104%. Households in some working age groups (40-59) are forecast to see negative growth¹⁷.
- 1.78. The 2011 Census revealed slightly more females than males, and a less diverse population than in England as a whole or Surrey, with 85% of the population reporting their ethnic group as White British compared to 79.8% in England and 83.5% in Surrey.
- 1.79. Surrey Heath is an expensive place to live with house prices and rental costs higher than the South East and national averages, although lower than the averages for Surrey. Affordability in Surrey Heath deteriorated by 89.9% between 2002 and 2018, a higher rate than for England and Surrey.
- 1.80. There is a greater than average supply of 3 bed houses in the Borough and also a higher proportion of 4+ bedroom houses in owner occupation (44%) and the private rented sector (17%) compared to the County and England. There are a significantly lower proportion of 1 bed dwellings in the private rented sector (18%) compared to Surrey (24%) and England (33%).

¹⁷ Available online at: <https://www.surreyheath.gov.uk/residents/planning/planning-policy/evidence-base>.



- 1.81. A higher proportion of the working age population are economically active than the South East and England and although unemployment has increased during the Covid-19 pandemic, levels are lower than the South East and Great Britain¹⁸. Access to employment areas in Farnborough, London, Heathrow and Reading means that Surrey Heath is a net out commuter with the total number of people living and working in Surrey Heath around 2% higher than the total number who work in Surrey Heath.
- 1.82. The largest residential development under construction at present (as at April 2021) is taking place at the former Princess Royal Barracks in Deepcut (Mindenhurst). This will deliver 1,200 dwellings and associated infrastructure.

The Economy and Retail

- 1.83. Surrey Heath's economic strength arises from a diverse economic base, with businesses ranging from international organisations to small and medium sized local enterprises. Surrey Heath contains several high profile businesses and corporations across a broad range of sectors including: Merrill Lynch, Siemens, Frazer Nash (Chobham), Novartis, and Unisys. Frimley Park Hospital, which is rated 'outstanding', is the Borough's largest employer. The Sandhurst Royal Military Academy is also partly located within the Borough.
- 1.84. The majority of employment floorspace is located in Camberley and Frimley at three large business parks and five industrial estates that make a significant contribution to the employment land supply. There are also four single occupancy sites housing major businesses; one located in Frimley, one near Mytchett, and two near the rural settlement of Windlesham. Fair Oaks Airport in Chobham provides employment use within the local area. 80% of office stock in the Borough was built between 1980 and 2009 with no significant office floorspace built since then.
- 1.85. Recent figures show that despite Covid-19 the local economy is relatively buoyant with comparatively low levels of unemployment and high rates of business formation, particularly small businesses. The Borough's traditional manufacturing industries have largely been replaced since the mid-1990s by information and technology based industries that benefit from strong linkages to the Thames Valley. These include the businesses in Watchmoor Business Park, which forms part of a larger business cluster based in and around the Blackwater Valley towns.

¹⁸ Available online at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157335/report.aspx>.



- 1.86. There has been a slight decline in employment floorspace in the Borough in the last 15 years although overall there has been an increase across the Functional Economic Area of Hart, Rushmoor and Surrey Heath. Within Surrey Heath, the losses were in office floorspace, including through the conversion of offices to residential uses through permitted development rights, but there was a small net gain in industrial floorspace. As at 2019, the Borough had the highest level of industrial floorspace in the FEA and higher than most neighbouring authorities.
- 1.87. The main retail centre in the Borough is Camberley, which provides shopping, business, leisure, cultural and community activities. Collectively Camberley is an active Business Improvement District (BID) which works to promote the town centre to residents, shoppers, businesses and visitors. The Council has identified the delivery of an improved Camberley town centre as a priority and has pro-actively delivered a number of improvements including the acquisition and improvement of town centre property such as The Square Shopping Centre, and significant public realm improvements.
- 1.88. The redevelopment of a 5.5 acre site at London Road remains the single biggest regeneration opportunity in the town centre. The intention is to create an attractive gateway to Camberley town centre, with new frontages to London Road (A30) and high quality streets and spaces that link the block with the High Street and Park Street.
- 1.89. Bagshot and Frimley are identified as District Centres providing a wide range of services and having a number of independent retailers. There are also a number of Local Centres and Neighbourhood parades in the Borough. The most significant out-of-centre retail exists at The Meadows at Camberley and at Bagshot Retail Park.

Landscape and Natural Environment

- 1.90. The River Blackwater forms the western boundary of the Borough. From here the land rises gradually to the north and east leading to the areas of heathland which give the Borough its name. The River Bourne (also known as the Addlestone Bourne) flows through the east of the Borough and out toward the River Wey. The other important waterway is the Basingstoke Canal that flows through the southern part of the Borough.
- 1.91. The main geological deposit in the Borough is sand and this determines both its topography and key landscape characteristics. The Borough can be defined by three main landscape areas. The west of the Borough is defined by the lower lying Blackwater Valley which has been subject to extensive urban development over the last 50 years. The central part of the Borough (outside the Blackwater Valley) is characterised by an elevated ridge landscape on plateau gravels, known as Chobham Ridges.



- 1.92. The third area encompasses the valleys of the Windlebrook/Halebourne/Millbourne and The Bourne. This area includes the main rural settlements as well as large areas of pasture land and woodland. In the eastern extreme of this area, around Chobham, there are extensive low lying meadowlands associated with the alluvial deposits in the river valleys.
- 1.93. The heathland areas in the Borough are internationally designated Special Protection Areas (SPA) and/or Special Areas of Conservation (SAC) which are also Sites of Special Scientific Interest (SSSI), and a designated National Nature Reserve at Chobham Common. The heathland habitat is home to three protected species of ground nesting bird namely Woodlark, Nightjar and Dartford Warbler. The Basingstoke Canal is also a Site of Special Scientific Interest. These areas take up approximately 23% of land in Surrey Heath. There are also numerous locally designated Sites of Nature Conservation Importance (SNCI) and one designated Local Nature Reserve (LNR).
- 1.94. The countryside within the Borough performs a number of roles: as well as being designated Green Belt in the east of the Borough it is important for maintaining the separation and character of the settlements along the Blackwater Valley. These countryside areas also have a major role to play as a leisure resource for the Borough and are a location for army barracks, military ranges, training areas, and test tracks. The future of these defence establishments is key to the future wellbeing of the Borough's countryside, and in particular, the protection of its biodiversity, particularly protected heathland areas.
- 1.95. Fluvial flood risk is largely from the Main Rivers including the Blackwater and tributaries and the Addlestone Bourne. The River Bourne catchment has large areas at risk, however much of this is rural undeveloped land. Most of the Borough is at low risk of groundwater flooding due to the underlying sandstone geology, with a higher risk close to river valleys.
- 1.96. Agricultural land makes up 26% of Surrey Heath. The agricultural land classification identifies the best and most versatile (BMV) agricultural land as classes 1, 2 or 3a. Surrey Heath does not have any class 1 or 2 BMV and only 10% of agricultural land is classified as BMV 3.



Quality of Life

- 1.97. In the English Indices of Multiple Deprivation 2019, Surrey Heath is ranked as 9th least deprived local authority (ranked at 309 of 317)¹⁹. However, this masks pockets of much higher levels of relative deprivation across the Borough particularly but not solely, relating to the Education, Skills and Training indicator²⁰.
- 1.98. Overall Surrey Heath is an affluent area with good health outcomes and relatively low rates of many conditions and unhealthy behaviours. The average life expectancy at birth²¹ for both men and women in Surrey Heath (82.2 and 84.8 years respectively) is similar to the Surrey average (81.8 and 85.0 years respectively). However, this masks some inequalities within the Borough with some groups/smaller areas having significantly greater needs or worse outcomes.
- 1.99. The Surrey Heath Place Based profile 2017²² published by Surrey County Council highlights key issues relating to health as including; health inequalities, the growing population of those aged over 65, and in particular the increase in those aged over 85, access to services for those without a car and significant proportions of people estimated to have long term conditions who remain undiagnosed.
- 1.100. The Borough has a new leisure centre in Camberley which opened in 2021. A range of formal and informal open spaces and playing pitches exist across the Borough and there are two country parks in Frimley Green and Lightwater. The Borough also contains a number of new or improved areas of open space providing mitigation for the impact of new development on the Thames Basin Heaths Special Protection Area. Known as Suitable Alternative Natural Greenspaces (SANG), these include Chobham Water Meadows, St Catherine's SANG and Windlemere SANG.
- 1.101. The main library in the Borough is Camberley Library, which provides a full range of services. Libraries at Bagshot, Frimley Green and Lightwater are smaller and have limited opening hours. Camberley Theatre provides a local venue for Arts, Film, Drama and Conference facilities. The Surrey Heath Museum is in Camberley, the Royal Logistics Corps Museum is at Deepcut and there is a small local museum in Chobham. In addition, the Surrey Heath Archaeological and Heritage Trust are based in Bagshot and the Basingstoke Canal Visitor Centre is at Mytchett.

¹⁹ Against average ranking.

²⁰ Available online at: www.gov.uk/government/statistics/english-indices-of-deprivation-2019.

²¹ Available online at: www.localhealth.org.uk/#bbox=479858.168432.26849.15897&c=indicator&i=t4.le_f_v&view=map10.

²² Available online at: <https://www.surreyi.gov.uk/health-profiles/surrey-heath/#header-conclusion>.



- 1.102. There are a number of village and community halls across the Borough, with improvements to community facilities to be funded as part of the Mindenhurst development. These contribute to the sustainability of local communities and support local activities and events.

Accessibility

- 1.103. Access to public transport varies across the Borough with Camberley, Frimley and Bagshot having access to a variety of transport opportunities (rail, bus, and cycling), while other areas of the Borough have limited or no access to alternatives other than the car.
- 1.104. The Borough is well connected by road to a number of strategic transport routes linking to London and the south coast. The M3 motorway stretching from London to Southampton crosses through the Borough from east to west and abuts the settlements of Camberley, Frimley, Bagshot and Lightwater. Other major highways that run through the Borough include the A331 Blackwater Valley Relief Road, which runs north to south along the western boundary and the A322, which connects junction 3 of the M3 with the towns of Bracknell to the North and Guildford to the South. The A30 runs east to west through the Borough and connects the Blackwater Valley with London and the South West of England.
- 1.105. Surrey Heath is served by three rail stations at Bagshot, Camberley and Frimley with trains operating on a branch line service between Ascot and Guildford. All three stations have poor access to London Waterloo. Many commuters living in Surrey Heath therefore use nearby faster services from stations outside the Borough at Farnborough, Woking and Sunningdale.
- 1.106. Based on the 2011 Census²³, Surrey Heath has one of the highest rates of car ownership in England and Wales with 90% of households owning a car or van, higher than the rest of Surrey. High levels of car ownership reflect the prosperity of the area, but also the historically poor public transport facilities. Vehicle emissions account for a large proportion of local air pollution within the Borough. The Department of Food and Rural Affairs (DEFRA) has identified one Air Quality Management Area (AQMA) in Surrey Heath known as the Camberley AQMA which runs parallel to the M3 from Junction 4 at Frimley up to the A325 Portsmouth Road at the Ravenswood roundabout in Camberley.

²³ Available online at:

www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/2011censuskeystatisticsforenglandandwales/2012-12-11#car-or-van-availability.



Climate Change

- 1.107. In 2019, the Borough Council declared a Climate Change Emergency setting out the intention to become carbon neutral across its own estate and operations by 2030. Like the rest of the UK the likely implications of climate change in the Borough will include higher average temperatures, particularly in summer and winter, changes in seasonal rainfall patterns, along with more intense periods of rainfall and the likelihood of more very hot days and heatwaves. The Climate Change Study, 2020²⁴ showed that the total carbon emissions for the Borough in 2017 was 417,346 tCO₂e. The greatest contributor to this was domestic energy use, accounting for 41% of emissions, with road transport the next greatest contributor (33%). Whilst overall emissions have dropped considerably since 2005, the Borough has a higher than UK average level of carbon emissions per square kilometre (km)²⁵.

²⁴ Available online at: www.surreyheath.gov.uk/residents/climate-change/climate-change-study.

²⁵ Available online at: www.ons.gov.uk/economy/environmentalaccounts/articles/carbondioxideemissionsandwoodlandcoveragewhereyoulive/2021-10-21.



Key Challenges, Vision and Objectives

Key Challenges

- 1.108. There are a number of challenges facing the Borough that will influence the development of planning policies and site allocations. Some key challenges are set out below. Alongside this, the long term effects of how people will change their work, living, shopping and travel patterns as a result of the Covid-19 pandemic are not yet known and may influence future planning policies.
- 1.109. An overriding challenge is to deliver the additional development and infrastructure that will support and benefit the changing population without compromising the quality of life of existing residents or cause harm to the environment.
- 1.110. Existing infrastructure is in some areas already at capacity. The preparation and implementation of the Local Plan must ensure that development which takes place is supported by the necessary physical, social and community infrastructure. This will mean cross boundary working in some instances and working with Surrey County Council and the Local Enterprise Partnership (EM3 LEP) to ensure funding and delivery.
- 1.111. In delivering housing to meet future needs, a key challenge will be to determine how much of this need can be met within the Borough, having regard to land availability, as well as environmental and policy constraints. In particular, the Thames Basin Heaths SPA as well as other designated national and local sites of nature importance and the Metropolitan Green Belt will impact upon housing delivery.
- 1.112. Providing a range of housing which helps meet the needs of all the Borough's residents will also need to be addressed through the provision of an appropriate mix of housing. In particular, the Borough has high house prices and there is a need to ensure the availability of affordable housing, as well as meeting the needs of an ageing population.
- 1.113. To ensure the ongoing economic success of the Borough the challenge will be not only to retain existing employment land but to provide opportunities for new businesses to locate into the Borough. Recognising the possibilities for a more flexible approach to the use of existing employment floorspace could help meet changing patterns of how businesses operate, in particular small and medium enterprises. The important role of rural businesses needs to be recognised, protected and enhanced.



- 1.114. The Council is taking a pro-active approach to ensuring the delivery of a regenerated Camberley town centre. The changing way in which people shop, along with recent regeneration schemes in neighbouring towns, means that the Local Plan will need to support development proposals that reflect these issues and ensure that Camberley remains competitive and an attractive choice. The Local Plan will also need to ensure that the Borough's District Centres of Bagshot and Frimley can continue to operate successfully by developing policies to ensure their viability and vibrancy.
- 1.115. In meeting future needs, there is a need to ensure that development within the Green Belt and Countryside beyond the Green Belt does not have a detrimental impact on the openness and purposes of the Green Belt and on the character of Countryside beyond the Green Belt.
- 1.116. Another key challenge will be to ensure that new development is designed and located to minimise its impact on the environment and that it mitigates, and is adapted for, climate change.
- 1.117. Local Plan policies and allocations will need to ensure that the character of towns and villages in the Borough is protected whilst allowing the necessary development to take place. Much of the character is derived from non-listed but locally important buildings and structures which are at risk of being lost through redevelopment or alteration. As such, the Borough needs to ensure that new development makes the most efficient use of land and buildings, but at the same time protects and enhances its designated and undesignated heritage assets and the quality and character of the built environment.

Vision for the Borough

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

By 2038 Surrey Heath will have maintained a high quality of life and retained its distinct identity of towns and villages whilst taking the growth identified in the Local Plan. In delivering growth, the Council will have taken opportunities to enhance neighbourliness and prevent isolation.



The natural environment assets including important heathland, and green infrastructure, will have been protected and enhanced, and an overall net gain in biodiversity will have been delivered. New development will reflect the distinctive character of the Borough's towns and villages. Local identity will be supported through conserving and enhancing the Borough's historic assets including those that contribute to its Victorian and Edwardian background and its military heritage.

New housing will reflect local needs, including those of specialist groups. Development will be of high quality and will have been designed to meet the challenges of climate change, minimising carbon dioxide emissions and taken opportunities for providing renewable and low carbon energy schemes.

Camberley town centre will be thriving and digitally connected, offering a wide range of shops, excellent leisure experiences, cafés and restaurants, flexible office premises, a full range of community services and an increased number of new homes meeting local needs.

Development will be of a high-quality design including measures to mitigate and adapt to climate change with improved green and civic open spaces. There will be safe and easy access to and within the centre with a good public transport system and an emphasis on improved cycle and pedestrian priority.

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

The Borough will have a thriving economy performing to its full economic potential as a leading centre in Northwest Surrey and the wider Blackwater Valley. The diverse range of employment provision will support growth ambitions of the Enterprise M3 Local Enterprise Partnership and the employment needs of the Functional Economic Area of Hart, Rushmoor and Surrey Heath. The important role of the rural economy will have been supported.

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



Strategic Objectives

- 1.119. The following Objectives set out (in no order of priority) the link between the Vision and the draft policy approaches set out in this Draft Local Plan.

Table 2 – Strategic Objectives

Objective	Strategic Objective
Objective A	To deliver sustainable development that contributes to meeting housing needs, providing new homes of an appropriate mix and tenure, including specialist housing needs.
Objective B	To protect Strategic and Locally important employment sites to ensure an appropriate supply of employment land to help fulfil the Borough's role in facilitating strong economic performance within the Functional Economic Area (Hart, Rushmoor and Surrey Heath) and wider EM3 LEP area.
Objective C	To enhance the vitality and viability of Camberley Town Centre and the other District and Local centres within the Borough.
Objective D	To ensure that development within the Borough is supported by the necessary physical, social and green infrastructure to meet the needs of future Surrey Heath residents.
Objective E	To ensure that development does not have a detrimental impact on the Borough's environmental assets including designated international and national sites, landscape character, water quality and biodiversity and that new development provides opportunities to provide for biodiversity and environmental net gains.
Objective F	To ensure that new development minimises or mitigates the impact of development on air quality, noise, light pollution, odours, emissions and particulates.
Objective G	To ensure that new development, unless appropriate development under the Exceptions Test, is not located in areas of high or medium risk of flooding and that development does not increase surface water run-off.

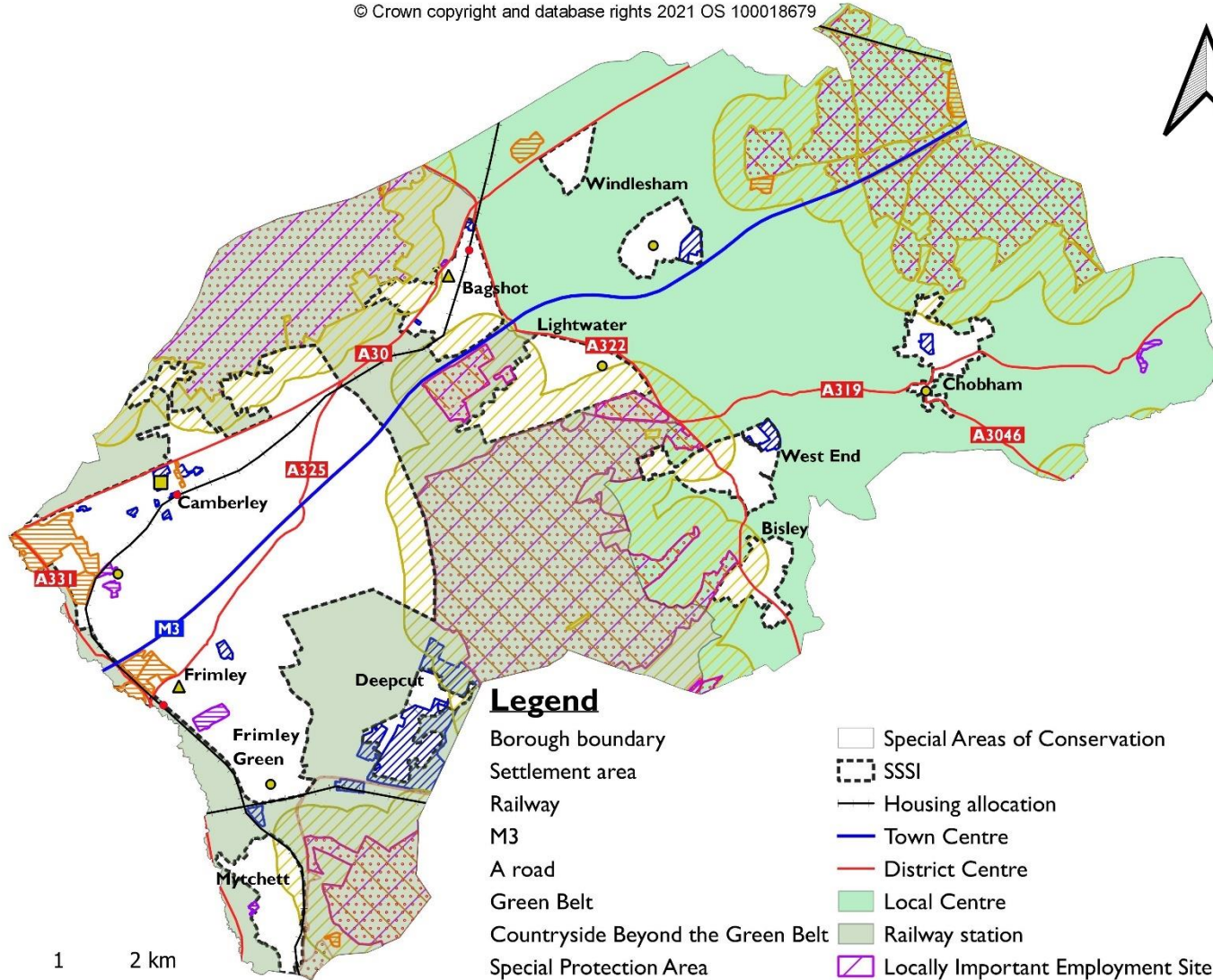


Objective H	To support action on climate change and reduction of the Borough's carbon emissions, aiding the transition to net zero through a combination of mitigation and adaptation measures, including the appropriate delivery of opportunities for renewable energy, energy efficiency and improving resilience to the impacts of climate change.
Objective I	To protect the character and purpose of the Green Belt and the character of the Countryside beyond the Green Belt.
Objective J	To conserve and enhance the Borough's built environment and heritage assets, both designated and non-designated.
Objective K	To promote healthy, sustainable, and cohesive local communities through good design, and access to homes, employment, community and recreational facilities.
Objective L	To support measures that prioritise active and sustainable travel modes including improved facilities for pedestrians and cyclists and improvements to public transport.



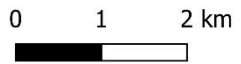
Key Diagram

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Legend

- | | | | | | |
|-----------------------------------|-----------------------------------|------------|-----------------------------------|---|-----------------------------------|
| — | Borough boundary | □ | Special Areas of Conservation | ▨ | Strategic Employment Site |
| ⋯ | Settlement area | ⋯ | SSSI | ▨ | Locally Important Employment Site |
| — | Railway | — | Housing allocation | ▨ | |
| M3 | M3 | — | Town Centre | ▨ | |
| A | A road | — | District Centre | ▨ | |
| Green Belt | Green Belt | Green Belt | Local Centre | ▨ | |
| Countryside Beyond the Green Belt | Countryside Beyond the Green Belt | Green Belt | Railway station | ▨ | |
| Special Protection Area | Special Protection Area | ▨ | Locally Important Employment Site | ▨ | |
| SPA 400m Buffer | SPA 400m Buffer | ▨ | Strategic Employment Site | ▨ | |

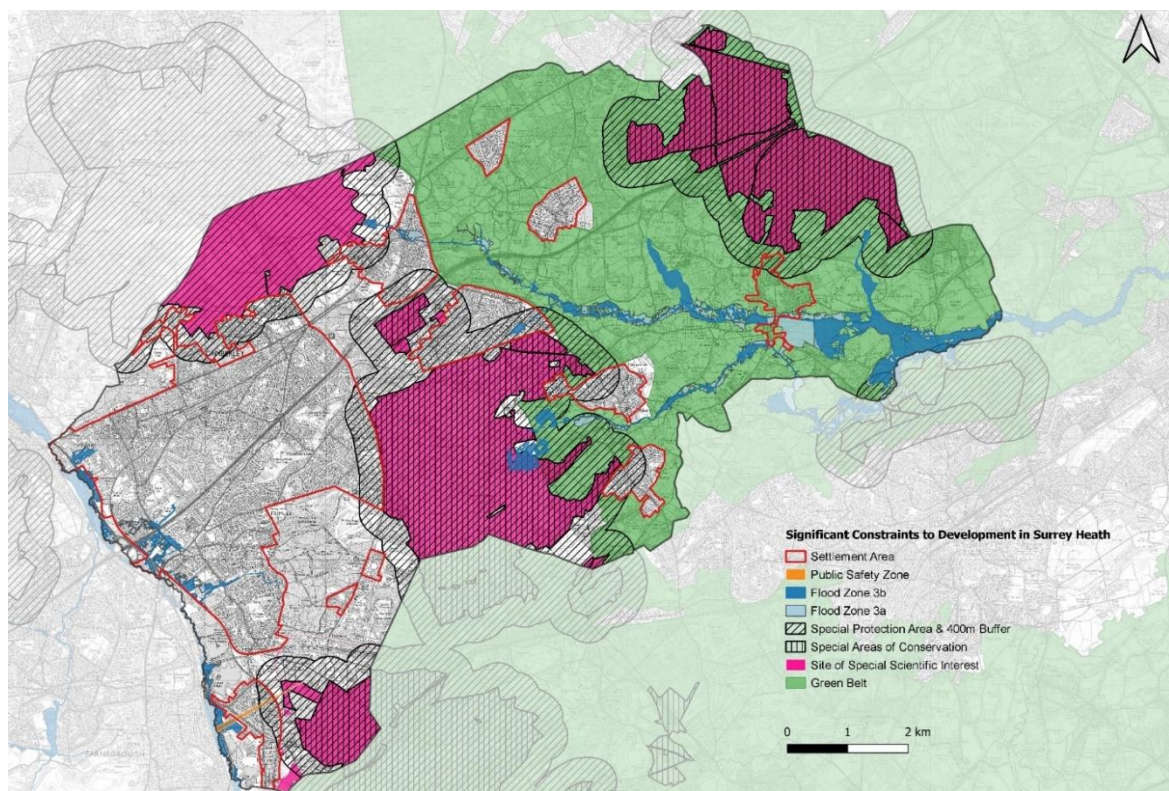


2. Section 2: Spatial Strategy

Policy SSI: Spatial Strategy

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

Figure 2 – Constraints Map



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

New homes

- 2.5. The delivery of new homes forms a key element of the spatial strategy. The National Planning Policy Framework (NPPF) requires that local plans use the Government's standard methodology, as set out in national Planning Practice Guidance, for calculating Local Housing Need, unless exceptional circumstances justify an alternative approach. The Local Housing Need calculation for Surrey Heath is set out in the Strategic Land Availability Assessment (2021)²⁶. The Local Housing Need figure for Surrey Heath is 327 homes per year. Over the plan period (2019 – 2038), this totals 6,213 new homes.
- 2.6. The Local Housing Needs Assessment (2020) provides a more detailed assessment of local housing need in terms of the housing mix and need for affordable homes. The study supports use of the standard methodology figure and outlines that this broadly aligns with the population projection associated with economic forecasts for the Borough.
- 2.7. It is challenging to accommodate the level of housing growth derived from the standard methodology within the Borough and a proactive approach to identifying opportunities for development in suitable locations has been undertaken, as set out in the Housing Supply Topic Paper. A robust Strategic Land Availability Assessment (2021) has been prepared based on a Call for Sites and targeted correspondence with landowners and provides detailed evidence on the supply of deliverable and developable sites.

²⁶ Available online at: <https://www.surreyheath.gov.uk/SLAA>.



- 2.8. To date, 728 new homes have been delivered during the plan period (2019 – 2021). Existing planning permissions that are yet to be completed, as at 31 March 2021, comprise a further 2,424²⁷ new homes. Together, these provide for 3,152 new homes. Consequently, the Council is required to find further capacity for an additional 2,708²⁸ new homes to meet the Local Housing Need throughout the Local Plan period up to 2038. Table 3 below sets out the sources of supply that provide the Council's Local Housing Need up to 2038 (when adjusted for unmet need being delivered in Hart).

Table 3 – Housing Supply

Source	Number of dwellings (net) per delivery period					
	Completed	1-5 years	6-10 years	11-15 years	16-17 years	Total
Allocated Sites	-	204	1,265	578	-	2,047
Non-Allocated SLAA Sites (incl. C2 equivalent)	-	91	252	83	-	426
Windfall Sites	-	91	153	153	60	457
Completions	728	-	-	-	-	728
Outstanding capacity (Sites with detailed permission, commenced sites, and outline permissions) ²⁹	-	1,791	629	20	-	2,440
Permission lapse rate	-	-13	-3	-	-	-16
Total	728	2,164	2,346	881	60	6,082

- 2.9. Further detail is set out in the Strategic Land Availability Assessment (2021) and Housing Supply Topic Paper³⁰, which set out the sources of supply to ensure delivery of the housing requirement over the Local Plan period (2019 – 2038).

²⁷ Extant planning permissions provide for a total of 2,440 homes to be delivered. However, a 3% lapse-rate has been applied to non-commenced sites to reflect historic rates of non-delivery.

²⁸ This figure represents the Local Housing Need (adjusted for unmet need) of 5,680, with the 3,152 completed and committed new homes subtracted.

²⁹ Planning applications permitted up to 31st March 2021. This includes any site allocations that currently benefit from planning permission, such as the Mindenhurst (Former Princess Royal Barracks) development, which is allocated under Policy HA4.

³⁰ Available online at: <https://surreyheath.gov.uk/residents/planning/planning-policy/evidence-base>.



- 2.10. The spatial strategy directs the delivery of a significant number of new homes to Camberley Town Centre. In total, approximately 1,330 new homes are allocated within Camberley Town Centre, which will support its continued vitality and viability and form part of the Council's broader regeneration plans.
- 2.11. The Council is currently developing a corporate Camberley Town Centre Strategy, which will also be used to inform future masterplanning. As part of this regeneration strategy, approximately 1,200 (net) new homes will be delivered on key strategic Town Centre sites that are owned by the Borough Council, including:
 1. approximately 475 (net) new homes on the Land East of Knoll Road site (SLAA ID: 27),
 2. approximately 550 (net) new homes on the London Road Block site (SLAA ID: 814), and
 3. approximately 120 homes on the House of Fraser site (SLAA ID: 921).
- 2.12. Another strategic site allocation, at Mindenhurst, Deepcut (Former Princess Royal Barracks), will deliver approximately 1,200 new homes. This reflects the outline planning permission (Ref: 12/0546) granted in 2014 for the expansion of the existing village. This single site makes a significant and front-loaded contribution to the supply of new homes over the plan period. To date, detailed permission has been granted for 444 new homes, of which 108 are counted as complete within the SLAA (2021).
- 2.13. Outside of the settlement area, the Countryside Beyond the Green Belt is the next most sequentially preferable location for new homes. The Countryside Capacity Study identified limited opportunities for new homes as a result of environmental constraints and concerns over the availability of land for development. Suitable sites have been included in the housing supply.
- 2.14. The SLAA identifies sites currently within the Countryside Beyond the Green Belt that will deliver approximately a further 489³¹ homes within the plan period. In addition, 220 (net) new homes have been constructed and a further 417 (net) new homes are expected to be delivered on sites that currently benefit from planning permission currently within the Countryside Beyond the Green Belt. The total contribution of homes from sites currently in the Countryside Beyond the Green Belt is therefore 1,126.
- 2.15. The boundaries of the settlement areas and villages currently within the Countryside Beyond the Green Belt will be amended to reflect development with planning permission as shown in the Policies Map changes. This includes a site where planning permission has already been granted, at Waters Edge (248 homes) (Application Reference: 19/0031).

³¹ This includes 160 new homes delivered on Sturt Road, which was granted permission in November 2021 (Application Reference: 20/1048/FFU).



- 2.16. In the rural East of the Borough, which is covered by Green Belt, the delivery of new homes will be focused within the villages, including the reserve site areas in West End and Windlesham that will be brought into the settlement area. A revised village boundary for Chobham is proposed and land within the revised village boundary is proposed to be inset from the Green Belt. Further details are set out in the Chobham Village Boundaries Study. Opportunities for the development of new homes are generally limited to infilling within villages, redevelopment of previously developed land, and rural exception sites.
- 2.17. Whilst a number of sites in the Green Belt were submitted as part of the call for sites and a Green Belt Review undertaken, evidence has demonstrated that the Council is capable of meeting its needs for new homes through supply from other sources, including elsewhere in the Housing Market Area, in line with the NPPF. As a result, the Council has concluded that there are currently no exceptional circumstances to warrant the release of land from the Green Belt to accommodate new homes.

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

Location	Number of dwellings (net) per source of delivery			
	Completions	Commitments	SLAA	Total
West of the Borough				
Bagshot	48	236	134	418
Camberley	218	498	1,491	2,207
Deepcut	118	1113	138	1,369
Frimley	51	107	215	373
Frimley Green	0	23	177	200
Mytchett	8	254	23	285
Total	443	2,231	2,178	4,852
East of the Borough				
Bisley	0	0	32	32
Chobham	52	14	114	180
Lightwater	1	2	17	20
West End	220	20	96	336
Windlesham	12	173	36	221
Total	285	209	295	789
Non-Spatial				
Windfall Allowance	-	-	457	457
Lapse-Rate	-	-16	-	-16
Total	728	2,424	2,930	6,082



- 2.18. The housing supply incorporates a windfall allowance, in accordance with the provisions set out in paragraph 71 of the NPPF. Windfall developments are those which have not been specifically identified as being available in the Local Plan process, and often comprise previously developed sites that have unexpectedly become available. Windfall allowances have been included for small sites, prior approvals and rural exception sites and are based on previous rates of delivery that have been projected forward, as set out in the Housing Supply Topic Paper.
- 2.19. To ensure delivery of the housing requirement, a suitable supply buffer is needed to provide flexibility should there be unimplemented or slower implementation of planning permissions for housing development. More detail on the supply buffer and justification for it is set out in the Housing Supply Topic Paper. The Housing Trajectory in Appendix 2 identifies that the annual projected delivery of new homes is greater than the annual Local Housing Need figure for each of the first 10 years of the Local Plan period. However, there is a shortfall of supply of homes (unmet need) set against the Local Housing Need figure of 6,213 homes.
- 2.20. Surrey Heath forms part of the long-established Housing Market Area comprising the Hart, Rushmoor and Surrey Heath council areas. The three authorities have committed to working together to address housing needs within the Housing Market Area. It is recognised that Surrey Heath has significant environmental and planning constraints in the Borough.
- 2.21. Within the Hart District Local Plan (Strategy and Sites) 2032³², Policy SSI ‘Spatial Strategy and Distribution of Growth’ accounts for the delivery of unmet need within Surrey Heath Borough through the annualised delivery of 41 dwellings per annum up to 2032. The Surrey Heath and Hart District Local Plans overlap for a period of 13 years, from 2019 – 2032, which provides for a total of 533 homes to be delivered in Hart to meet Surrey Heath’s unmet housing need. Hart District has confirmed this commitment through duty-to-cooperate discussions.
- 2.22. Accordingly, Surrey Heath’s Local Housing Need figure is adjusted by subtracting 41 dwellings per annum up to 2032 (533 homes in total). Surrey Heath’s Local Housing Need figure over the plan period therefore becomes 5,680 homes.

³² Available online at:

https://www.hart.gov.uk/sites/default/files/4_The_Council/Policies_and_published_documents/Planning_policy/Hart%20LPS%26S.pdf.



- 2.23. The spatial strategy therefore takes account of environmental and planning constraints in the Borough, the standard methodology Local Housing Need figure of 6,213 homes, the Housing Need Study 2020, the Countryside Capacity Study, the Strategic Land Availability Assessment, and supply in Hart District to meet unmet housing needs, to determine a housing requirement figure of 5,680 new homes for the Local Plan, over the plan period 2019-2038. The Housing Supply Topic Paper sets out full details of the sources of supply to meet this housing requirement.
- 2.24. A housing implementation strategy will monitor and manage delivery of the supply of housing land to meet the housing requirement. This will include annual reviews of the SLAA and five-year housing land supply, an assessment of the risks to delivery, including monitoring the availability of Suitable Alternative Natural Greenspace (SANG), and setting out action to facilitate delivery, including proactive working with partners and developers. Progress will be reported through the Council's Authority Monitoring Report.

Employment

- 2.25. Surrey Heath benefits from a buoyant economy and a diverse economic base, with high technology industries strongly represented alongside traditional and advanced manufacturing. The Borough lies within the M3 Local Enterprise Partnership Area. Surrey Heath forms part of a functional economic area, comprising the three local authority areas of Hart, Rushmoor and Surrey Heath. The three authorities have strong economic linkages and form part of a commercial property market, focused on the Blackwater Valley area.
- 2.26. The spatial strategy plans to meet the employment land needs of the Borough, as part of the Hart, Rushmoor and Surrey Heath Functional Economic Area, by protecting and supporting employment uses within designated Strategic and Locally Important Employment Sites. The Employment Land Review Topic Paper (2019) demonstrates that the employment allocations and planning permissions, and with the potential to redevelop and intensify some sites, meets the range of lower to upper employment forecast requirements. The Strategic and Locally Important Employment Sites are identified on the Policies Map and predominantly clustered along the A331 in Camberley and Frimley.



Town Centre Uses

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

Green Belt and Countryside Beyond the Green Belt

- 2.28. 44% of land within Surrey Heath is designated as Green Belt. The Spatial Strategy seeks to deliver the National Planning Policy Framework objective of protecting Green Belt land by directing development away from this area. Development within the Green Belt will be assessed in line with national policy and Policy GBI.
- 2.29. Development opportunities in the Countryside Beyond the Green Belt have been explored through the Countryside Capacity Study and SLAA and suitable sites for new homes included in the supply. Boundaries of Settlement Areas are proposed to be redrawn to include sites currently adjoining, but excluded from Settlement Areas, where they have been assessed as suitable for development. These are shown in the Policies Map Changes. Development in land designated as Countryside Beyond the Green Belt will be assessed in line with national policy and Policy GB2.

Policy SSI: Spatial Strategy

- 1) To deliver sustainable growth, the Council will permit development which is consistent with the following broad spatial framework for the scale and location of development:
 - a) New development will be directed to the defined settlement areas in the west of the Borough, as shown on the policies map, and comprising the following areas:
 - i. Camberley
 - ii. Frimley
 - iii. Frimley Green
 - iv. Mytchett
 - v. Deepcut, and
 - vi. Bagshot village.



- b) Within this area, Camberley Town Centre will be a focus for significant new development, at high density, to support the regeneration of the town centre.
- c) The east of the Borough is heavily constrained by environmental designations and Green Belt and will have limited capacity to accommodate new development. Development opportunities in this area will be focused in:
 - i. Lightwater village;
 - ii. Bisley, West End and Windlesham villages, which are inset within the Green Belt; and
 - iii. Chobham village, which is proposed to be inset within the Green Belt.

New Homes

- 2) Over the period 2019 – 2038, the Council will ensure that, subject to the availability of deliverable avoidance and mitigation measures in respect of the Thames Basin Heath Special Protection Area, provision is made for the delivery of at least 5,680 new homes in the Borough. This housing requirement will be delivered as follows:
 - a) Approximately 4,852 homes focused in the settlement areas in the West of the Borough, from completions, existing planning permissions, allocations and SLAA sites, including:
 - i. In Camberley, approximately 2,207 (net) new homes, including approximately 1,700 net new homes in Camberley Town Centre, focused on two large site allocation at London Road Block (approximately 550 net new homes) and Land East of Knoll Road (approximately 475 net new homes),
 - ii. A major site allocation at Mindenhurst in Deepcut (Princess Royal Barracks site) of about 1,200 homes and Suitable Alternative Natural Greenspace,
 - iii. In Frimley, approximately 373 (net) new homes,
 - iv. In Frimley Green, approximately 200 (net) new homes,
 - v. In Mytchett, approximately 285 (net) new homes, and
 - vi. In Bagshot Village, approximately 418 (net) new homes.
 - b) Approximately 789 homes in the east of the Borough, including about 676 (net) new homes on sites in villages.
 - c) Other sources of supply to meet the housing requirement will be windfalls and other SLAA sites below the site allocation threshold.



Employment

- 3) The Borough's defined Strategic and Locally Important Employment Sites will be protected and supported for employment uses, to ensure that the employment land needs of the Borough, as part of the Hart, Rushmoor and Surrey Heath Functional Economic Area can be met. These sites will contribute to meeting the forecast increase in the total number of Employment Use Class jobs (Use Class E(g) and Uses Classes B2 and B8) in the Functional Economic Area over the Plan period.

Town Centre Uses

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

Green Belt and Countryside Beyond the Green Belt

- 8) In the Green Belt new development will be strictly limited and only permitted where it is in line with the NPPF and policy GB1.
- 9) In the Countryside beyond the Green Belt new development will be limited in line with the NPPF and policy GB2.



Policy SS2: Presumption in Favour of Sustainable Development

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

Policy SS2: Presumption in Favour of Sustainable Development

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

- 2.31. In order to ensure that planning decisions reflect the national presumption in favour of sustainable development and to ensure that this approach can be taken where a local plan is silent or policies become out of date, local authorities are encouraged to include a policy reflecting this presumption.

- 2.32. The NPPF identifies that some assets or areas of particular importance may mean that proposals are not supported despite the presumption in favour. These are identified as including land designated as Green Belt and habitats sites which include Special Protection Areas and Special Areas of Conservation, designated heritage assets and Sites of Special Scientific Interest. These are designations that all lie within Surrey Heath Borough, and will therefore be a factor in implementing this Policy and the presumption in favour of sustainable development.



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

Policy SS3a and SS3b: Climate Change Mitigation and Adaptation

- 2.34. Climate change is one of the greatest challenges facing our society. The scientific evidence of climate change is overwhelming and will have a lasting impact on people and wildlife. The Intergovernmental Panel on Climate Change 2018 report³³ makes clear that the impacts of climate change are being experienced now through unprecedented global trends and through more localised severe weather events. The Climate Change Act 2008, which was amended in 2019, sets the target for net zero carbon emissions by 2050. The Paris Agreement (2015), which was adopted by participating member states of the 21st Conference of the Parties (COP) of the United Nations Framework Convention on Climate Change, establishes an aspiration to achieve net zero greenhouse gas emissions during the second half of the 21st century.
- 2.35. The Council has a very important role in shaping new and existing developments in ways that reduce carbon emissions and positively build community resilience to problems such as heat stress or flood risk. Policies in the Local Plan must ensure that development within the Borough contributes to the mitigation of, and adaptation to climate change. This policy sets out the overarching policy approach to climate change, drawing on the evidence from the Surrey Heath Climate Change Study (2020).

³³ V Masson-Delmotte et al.: Global Warming of 1.5°C. An IPCC Special Report on the Impacts of Global Warming of 1.5°C above Pre-industrial Levels and Related Global Greenhouse Emission Pathways, in the Context of Strengthening the Global Response to the Threat of Climate Change, Sustainable Development, and Efforts to Eradicate Poverty. Summary for Policymakers. Intergovernmental Panel on Climate Change, Oct. 2018. Available online at: http://report.ipcc.ch/sr15/pdf/sr15_spm_final.pdf.



- 2.36. There is an important link between the physical and social environment in which we live and how healthy we are, both physically and mentally. Planning has a central role in creating places where it is easier for people to live healthier lives and robust climate change policies can help achieve this. In delivering measurable climate change mitigation and adaptation measures, the Policy seeks to ensure that new development in Surrey Heath considers local issues relating to health and wellbeing at an early stage of the planning process and will also deliver improvements and contribute to health and wellbeing, making it easy for the residents of the Borough to live healthy, green lifestyles.

Policy SS3a: Climate Change mitigation

- 1) To support a decarbonisation trajectory to net zero by 2050, the Council will seek to deliver significant reductions in carbon emissions for the Borough. This will be achieved by:
 - a) ensuring that new development contributes to addressing climate change through low/zero carbon design and improves energy efficiency for all residential and non-residential buildings, as set out in Policy DH8;
 - b) supporting renewable and low carbon energy and heating schemes for major development proposals in accordance with Policy E5;
 - c) supporting the low carbon economy, a focus of the emerging Local Industrial Strategy for the Enterprise M3 Local Enterprise Partnership (LEP)³⁴;
 - d) directing development to locations in the defined settlement areas in the West of the Borough that will minimise the need to travel and maximise the use of sustainable modes of transport, promoting a modal shift away from private car use;
 - e) promoting sustainable modes of transport through Policy IN2, including provision and installation of electric vehicle charging points for all developments;
 - f) ensuring that trees are protected, in accordance with Policy DH5, and that there is no net loss in the carbon storage capacity provided by the Borough's trees³⁵;
 - g) increasing the potential for green infrastructure and habitats to sequester³⁶ and store carbon, including through biodiversity net gain as set out in Policy E3, and supporting the planting of trees in the Borough; and

³⁴ See enterprisem3.org.uk/hub/clean-growth

³⁵ This generally equates to ensuring that there is no net loss in the biomass equal to the original tree.

³⁶ Carbon sequestration can be defined as actions required for the long-term storage of carbon dioxide or other forms of carbon to either mitigate or defer global warming and avoid dangerous climate change.



- h) requiring new development to manage construction waste effectively and responsibly to reduce the carbon emissions of construction activities, set out in policy DH8.
- 2) Development proposals will need to demonstrate how they are maximising reductions in carbon emissions and contributing to the decarbonisation trajectory for net zero by 2050. Unless otherwise required through site allocation policies, proposals for over 500 dwellings will be required to deliver zero carbon development, either through on-site measures or, if it is demonstrated that is not feasible, through carbon offsetting.

Policy SS3b: Climate Change adaptation

- 1) New development will be permitted which helps build communities that are resilient to climate change and contribute to healthy living by:
 - a) being designed so as to maximise the potential for climate change adaptation, as set out in Policy DHI, to ensure that new development minimises vulnerabilities and provides resilience to impacts arising from climate change;
 - b) positively contributing to creating high quality, active, safe and accessible places;
 - c) maximising sustainable water use, in accordance with Policy DH4;
 - d) addressing existing and future flood risk, in accordance with Policy E6;
 - e) maximising the potential of green infrastructure in the design of new development to facilitate adaptation to climate change, in accordance with Policy IN5;
 - f) planting trees and other vegetation, where appropriate as part of the landscape scheme, to provide shading of amenity areas, buildings and streets;
 - g) delivering urban greening, including incorporating green walls and green roofs into new development;
 - h) delivering biodiversity net gain and avoid the loss of biodiversity, in accordance with Policies E2 and E3; and
 - i) minimising the potential for heat stress, particularly areas or types of development at greater risk of heat stress, through innovative design.
- 2) Development proposals will need to demonstrate how they are maximising their adaptive capacity. Planning applications relating to major development, infrastructure and potentially vulnerable developments will be required to provide severe weather management plans.
- 3) Measures that will help contribute to healthier communities and reduce health inequalities must be incorporated into new development where appropriate. Proposals for major development schemes should incorporate a Health Impact Assessment (HIA).

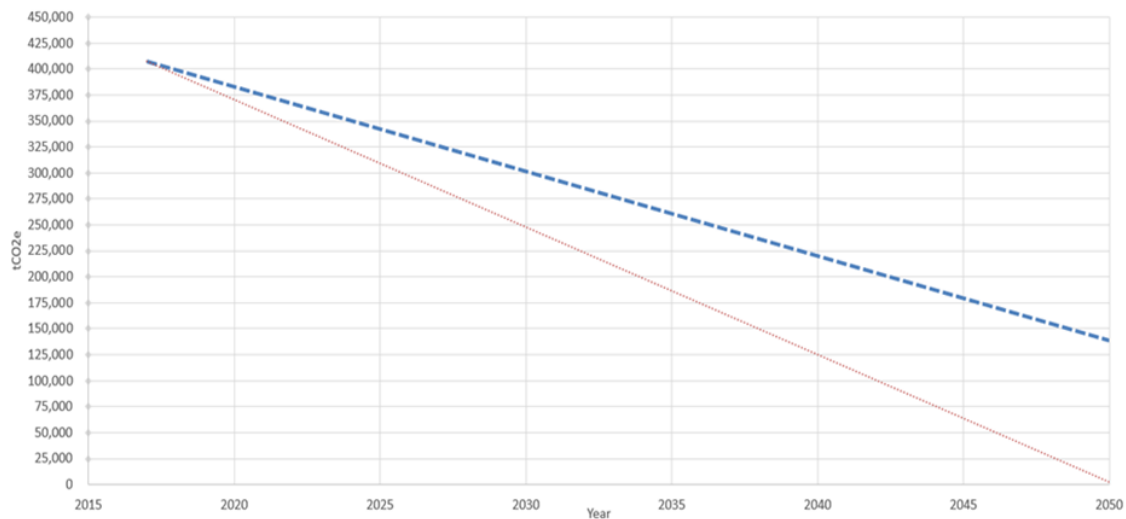


- 2.37. Section 19(1A) of the Planning and Compulsory Purchase Act 2004 states that ‘Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change’.
- 2.38. The NPPF identifies the planning system as having an important role in supporting the transition to a low carbon future in a changing climate, including the valuable contribution that small scale projects can provide. The NPPF states that the planning system should help shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience. At paragraph 153 the NPPF identifies that Plans should take a proactive approach to mitigating and adapting to climate change.
- 2.39. In 2018, the Government’s Road to Zero strategy set out its ambitions for all new cars and vans to be effectively zero emission by 2040. In October 2021, the Government published the Net Zero Strategy: Build Back Green that’s sets out policies and proposals for keeping the United Kingdom on track for its coming carbon budgets and a vision for a decarbonised economy in 2050. The Surrey Climate Change Strategy sets out a goal to achieve net zero by 2050 and provides a joint framework for collaborative action on climate change across Surrey’s local authorities and other partners.
- 2.40. In order to meet the requirements of Section 19(1A) of the Planning and Compulsory Purchase Act 2004, it is important that Local Plans include policies designed to contribute to the mitigation of, and adaptation to, climate change.
- 2.41. The Surrey Heath Climate Change study (2020) explores how climate change objectives, both in respect of mitigation and adaptation, might most effectively be addressed through the Local Plan. To achieve this, the study seeks to answer the following three questions for both climate change mitigation and adaptation:
1. What is the context?
 2. What is the baseline scenario?
 3. What are the intervention options feasibly open to the Council?



2.42. The study sets out that, based on the Borough’s baseline emissions as of 2017, there will be an estimated reduction of 45% in carbon emissions by 2040 based on current trends. The study identifies that in order to achieve net zero by 2050, there will be a need to achieve carbon emission reductions of approximately 70% by 2040, as illustrated in Figure 3 (below). This illustrates that there is a significant ‘policy gap’ that needs to be addressed through the Local Plan and the study concludes that objectives relating to climate change mitigation and adaptation must be central to Local Plan decision-making. However, the study also makes clear that achieving a net zero decarbonisation trajectory will also require interventions outside of the Local Plan’s sphere of influence, most notably in respect of retrofitting of existing buildings, but also in numerous other areas, e.g. in respect of supporting electric vehicle uptake and new energy infrastructure.

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



2.43. The Surrey Heath Climate Change study makes a number of recommendations for interventions that the Local Plan can take to maximise carbon emission reductions in new development and the resilience of local communities to a changing climate. These recommendations have been incorporated into the draft Local Plan, including directly into the suite of climate change policies for which policy SS3a is overarching.

2.44. The Council will produce a Climate Change and Green Infrastructure SPD that will set out detailed guidance on how new development can contribute to climate change mitigation and adaptation. Applications for larger development proposals should consider the potential to deliver the electricity supply needs for electric or low emission vehicles through on-site renewable energy provision.



- 2.45. All proposals for new residential development should demonstrate how they are maximising reductions in carbon emissions and contributing to the decarbonisation trajectory for net zero by 2050, as well as demonstrate how they are maximising climate resilience. This should be included as part of the Design and Access Statement. Development proposals in excess of 500 net new dwellings will be required to deliver zero carbon development, either through on-site measures or, if it is demonstrated that is not feasible, through carbon offsetting. Where a development proposal would result in the loss of trees, it should be clearly demonstrated by the applicant that the loss will be offset through the provision of tree or vegetation planting of equal or greater carbon storage capacity.
- 2.46. The cost implications of meeting the requirements for climate change will be assessed along with other requirements in the Plan through a Whole Plan Viability Study. In line with national planning policy and guidance applicants will need to take these Policy requirements into account when acquiring sites and in preparing development proposals. Development proposals that do not meet the Policy requirements will only be supported in exceptional circumstances and where the applicant can demonstrate site specific circumstances that can identify circumstances that were unaccounted for in the Whole Plan Viability Study. In order for the Council to consider such circumstances an independent viability appraisal must be submitted. To ensure transparency, this will be published on the Council's website and developers will be expected to meet the costs of any financial appraisals commissioned by the Council as well as their own. Notwithstanding this the Council will not permit development if it would compromise the Council's ability to meet its duties under Section 19(1A) Planning and Compulsory Purchase Act 2004.
- 2.47. Successful adaptation to climate change requires a holistic approach, which includes everything from flood risk to heat stress. Green infrastructure plays an important role in climate change mitigation, through contributing to carbon sequestration, and climate change adaptation, including through reducing heat stress and the potential for surface water flooding. This could include the incorporation of bio-diverse roofs, combination green and blue roofs and green walls, where appropriate, into new development. The climate change and green infrastructure SPD will provide detailed guidance on how new development can maximise the potential of green infrastructure in contributing to climate change adaptation.



- 2.48. The Council's Strategic Flood Risk Assessment identifies the potential impact of Climate Change on flood risk in the Borough. Where it can be demonstrated that the design of the development can deal with flood risk safely in the long term, they should be considered positively in the exception test (and sequential test if applied). This concept has been widely applied in Europe, ensuring that communities can 'live with' flood risk. This is particularly important where there are no alternative realistic options for new development.
- 2.49. As a result of climate change, the impacts of heat stress in residential properties and urban environments is likely to become increasingly prevalent and impact on the health of local people. Heat stress is particularly of concern for the elderly who are less able to regulate their own body temperature and urban areas at greater risk of the urban heat island effects. The Local Plan will seek to ensure the new development for at risk groups to heat stress, such as the elderly, or in at risk areas of heat stress, such as urban areas, takes full account adaptation measures for heat stress in site layout and design.
- 2.50. Through supporting and delivering zero/low carbon development which is resilient to climate change, the policy will also contribute significantly to health and wellbeing. In producing climate change assessments, development proposals should include details of how new development will deliver improvements to health and well-being through high quality, future proofed sustainable development.
- 2.51. The creation of healthy environments for people of all ages across the Borough will be a key consideration when the Council assesses and determines planning applications to support and enhance health and wellbeing in the Borough, taking account of site-specific considerations. A healthy environment can promote and encourage healthy lifestyles and these are aided through good urban design, green open spaces and access to active travel choices such as walking and cycling. Other than the built and natural environment, there are social and cultural factors that promote good health and wellbeing – such as a variety of community groups, religious institutions, arts, and culture and leisure facilities.
- 2.52. For major development proposals it is a requirement to prepare a HIA. The HIA should identify the likely health impacts of the development and include measures to improve health outcomes and address negative effects and inequalities. The scope of a HIA will vary depending on the size of the development and its location.



3. Section 3: Housing

Policy HA1: Site Allocations

- 3.1. Policy HA1 allocates sites for development within Surrey Heath to support the Local Plan's spatial strategy, meeting the identified housing requirement in the Borough set out in Policy SSI. To meet this requirement, sites are allocated for the development of housing, in addition to some other uses.
- 3.2. Site allocations are informed by the conclusions of the Strategic Land Availability Assessment ('SLAA'). The SLAA is updated annually and assesses potential development sites within the Borough. The SLAA process has identified a range of sites that are considered deliverable and/or developable within the Plan Period³⁷.
- 3.3. The Local Plan allocates those SLAA sites that have been found to be sustainably located and are also projected to deliver 25 new homes or more (inclusive). The allocation of these sites has been considered with regard to national policy and the spatial strategy for Surrey Heath.
- 3.4. The findings of the Sustainability Appraisal have also been taken account of in the allocations process. Development is directed to the most sustainable locations, making the best use of previously developed land.
- 3.5. Together, the site allocations seek to deliver a significant proportion of the Local Plan's housing requirement. The remainder of the Borough's housing requirement will be delivered on non-allocated sites that are identified in the SLAA. The SLAA provides an assessment of all sites that are suitable, available and achievable for housing and economic development uses over the plan period. Of the housing sites that form the supply, only those meeting the criteria outlined above have been specifically allocated.
- 3.6. In addition to the identified sites, the housing trajectory includes allowances for the likely delivery of smaller sites below the site-size threshold of 5 units or more (net), homes delivered through prior notification applications, and other general windfall sites. There are also opportunities for rural exception sites to deliver new homes, which are small-scale developments providing affordable homes in locations where new homes would not usually be appropriate. These allowances are based on previous delivery trends. Decisions on these sites will be informed by the Local Plan's strategy and policies.

³⁷ As defined in NPPF Annex 2: Glossary. Available online at: www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary.



- 3.7. Site allocations do not grant planning permission for the site. Planning applications will continue to be determined on their own merits in relation to the policies in this plan. The allocated approximate quantum of development for each site is based on an initial assessment of its potential capacity and is neither a maximum nor a minimum. Further detail and evidence will need to be considered at the planning application stage regarding constraints, design considerations, and the need to deliver the most efficient use of the land.
- 3.8. Policies HA1, HA2, HA3 and HA4 set out the Borough's residential-led site allocations. Development proposals for allocated sites will be required to accord with the detailed development requirements as set out in the relevant site allocation policy. The Local Plan contains numerous other policies, which also apply to these sites in addition to the specific requirements set out in the site allocation policies. Where site allocation policies set out requirements that are more stringent than those in another policy within the Local Plan, the site allocation policy will take precedence.
- 3.9. Policies HA2 and HA3 set out site-specific development requirements for the strategic housing allocation sites located in Camberley Town Centre. Policy HA4 sets out site-specific development requirements for the strategic site at Mindenhurst (formerly Princess Royal Barracks), Deepcut, which benefits from outline planning permission and is currently under construction for phases where full planning permission has been secured.
- 3.10. Development proposals should aim to approximately deliver the identified quantum of development for the relevant site. Development proposals may be permitted that are higher or lower than the indicative capacity, which must be determined through the adoption of a design-led approach. Significant reductions from the approximate housing numbers as set out in the site allocations will be strongly resisted.
- 3.11. Further detailed information about these sites is available in the SLAA, which forms part of the Local Plan evidence base. The SLAA site reference number is shown on the site policy, for ease of cross referencing.



3.12. Policy HA1 allocates the following sites for housing (C3) development:

Table 5 – Site Allocations in Policy HA1

Policy Reference	SLAA Site ID	Site Name / Address	Number of homes allocated (net)
HA1/01	181	134 and 136 London Road, Bagshot	26
HA1/02	247	Bagshot Depot and Archaeology Centre, London Road, Bagshot, GU19 5HN	50
HA1/03	921	Land East of Park Street, North of Princess Way (former House of Fraser)	120
HA1/04	865	84-100 Park Street, Camberley	61
HA1/05	240	Camberley Centre, France Hill Drive, Camberley, GU15 3QG	35
HA1/06	25	Camberley Station, Station House, Pembroke Broadway	75
HA1/07	833	York Town Car Park, Sullivan Road, Camberley	27
HA1/08	552	Land at Frimhurst Farm, Deepcut Bridge Road, Deepcut	65
HA1/09	907	Sir William Siemens Square, Chobham Road, Frimley	200
HA1/10	557	Land west of Sturt Road, Frimley Green	160
HA1/11	178	Land east of Benner Lane (partial Housing Reserve Site), West End	73
HA1/12	177	Housing Reserve Site, East of Heathpark Drive, Windlesham	116
HA1/13	447	Chobham Rugby Club, 50 Windsor Road, Chobham, GU24 8LD	91

3.13. Policy HA1 allocates the following sites for Extra-Care Accommodation, Sheltered Accommodation, or Care Home (C2) development:

Table 6 – Site Allocations for C2 Development in Policy HA1

Policy Reference	SLAA Site ID	Site Name / Address	Number of homes allocated (net)
HA1/14	801	Pinehurst, 141 Park Road, Camberley	44 (C3 Equivalent)



Policy HAI: Housing allocations

1) The following sites are allocated for housing to support the delivery of new homes to meet Surrey Heath's housing requirement in Policy SSI:

Site Reference	Site Name / Address	Indicative Homes (Gross)	Net
HAI/01	134 and 136 London Road, Bagshot	26	26
Description	Outline planning permission has been granted for a residential-led scheme totalling 26 apartments at the site.		
Development Requirements	<p>1) Development proposals are required to:</p> <ul style="list-style-type: none"> a) retain and enhance the local character of the area, b) implement a scheme with distinctive yet sympathetic identity, which provides an appropriate focal point given the site's prominent location on London Road. c) incorporate suitable pedestrian and cyclist access from the site, helping to encourage linkages between the site and Bagshot District Centre to the east, and Camberley to the west. d) retain the existing vegetation boundary along London Road as far as reasonably practicable. e) provide high-quality landscaping and usable private and communal amenity spaces, whilst avoiding future pressures to remove TPO trees. 		
Site Reference	Site Name / Address	Indicative Homes (Gross)	Net
HAI/02	Bagshot Depot and Archaeology Centre, London Road, Bagshot, GU19 5HN	50	50
Development Requirements	<p>1) Development proposals are required to:</p> <ul style="list-style-type: none"> a) demonstrate that the design of the scheme is genuinely conservation-led, having special regard to the retention and enhancement of the character of the Bagshot Park Conservation Area and its setting, in which the Grade II listed Bagshot Park forms the centre piece. b) demonstrate that the design of the scheme has been informed by: <ul style="list-style-type: none"> i. a detailed Air Quality Assessment (AQA), which 		



Policy HA1: Housing allocations			
	<p>identifies potential significant adverse impacts on sensitive receptors from any source of emissions to air, and</p> <p>ii. an Emissions Mitigation Assessment (EMA), which details the appropriate avoidance and mitigation measures that will be implemented to prevent significant adverse impacts on sensitive receptors, including future occupiers or users of the site, from any sources of emissions to air.</p>		
Site Reference	Site Name / Address	Indicative Homes (Gross)	Net
HA1/03	Land East of Park Street, North of Princess Way (former House of Fraser)	120	120
Development Requirements	<p>1) Development proposals are required to implement a design-led, mixed-use redevelopment scheme that:</p> <ul style="list-style-type: none"> a) incorporates active town-centre uses at ground-floor level. b) provides flatted development above the ground-floor level at a suitable density for the town-centre location. c) utilises high-quality architectural design to improve engagement with the street-scene, contributing to urban greenery and providing distinctive public realm within this prominent central location. d) provides an enhanced gateway into Camberley Town Centre from Park Street, incorporating an attractive promenade that leads through to The Square Shopping Centre and an attractive link to Princess Square. e) maximises the corner location to create an attractive, design-led, contemporary urban living environment that takes account of external views from new flatted development, uses the built form, changes in materials, and hard and soft landscaping, to define public and private spaces effectively. f) supports the broader regeneration of Camberley Town Centre, providing a contemporary and sustainable development that delivers an attractive and accessible public realm, including integrated services for the public. 		



Policy HAI: Housing allocations			
Site Reference	Site Name / Address	Indicative Homes (Gross)	Net
HAI/04	84-100 Park Street, Camberley	61	61
Description	The site benefits from planning permission for 61 sheltered apartments. However, the site has been identified as being suitable for a revised, residential (C3) development scheme.		
Development Requirements	<p>1) Development proposals are required to:</p> <ul style="list-style-type: none"> a) comprise flatted accommodation of a suitable density given the town-centre location, within walking distance of Camberley Train Station. b) utilise high-quality architectural design to provide a coherent building-line along Park Street that contributes to and engages the existing street-scene in this prominent central location, improving the public realm. c) incorporate vehicular access to the site from Southwell Park Road. d) demonstrate that the detailed site layout has been informed by the proximity to the railway flanking the southern boundary of the site regarding safety, noise, and visual barrier effects. e) retain and strengthen the existing tree planting and landscape buffering between the site and the railway line, to reduce noise and visual impacts from the railway. 		



Policy HAI: Housing allocations			
Site Reference	Site Name / Address	Indicative Homes (Gross)	Net
HAI/05	Camberley Centre, France Hill Drive, Camberley, GU15 3QG	35	35
Development Requirements	<p>1) Development proposals are required to:</p> <ul style="list-style-type: none"> a) retain and reuse the existing Adult Education Centre (AEC) building, a local heritage asset, including the generous landscape setting. b) implement a design-led development that is sympathetic to and integrates well with the scale, height, and character of the existing Adult Education Centre (AEC) building. c) retain as far as practicable the existing abundance of trees and landscaping, which contributes to the local distinctiveness of the site. d) retain the existing educational community use on-site, or re-provide the use at a suitable off-site location. e) provide improved pedestrian and cycle access to the site from Camberley Town Centre. f) provide suitable vehicular access to the site, and suitable highways access within the site. 		



Policy HAI: Housing allocations			
Site Reference	Site Name / Address	Indicative Homes (Gross)	Net
HAI/06	Camberley Station, Station House, Pembroke Broadway, Camberley	75	75
Development Requirements	<p>1) Development proposals are required to:</p> <ul style="list-style-type: none"> a) deliver a high-quality, design-led, sustainable development suitable for the prominent gateway location to Camberley Town Centre. b) be sympathetic to the complex surrounding context of the site with regard to scale, height, and massing. Particular consideration should be given to the adjacent King's Court and the former Magistrate's Court development site. c) incorporate a new or improved train station, with associated transport interchange facilities, including car and cycle parking. d) incorporate high-quality, design-led, public realm and wayfinding improvements for pedestrians and cyclists, improving connectivity to Camberley Town Centre and to both Portesbery Road and Knoll Road. Public realm improvements should focus on improving connectivity, safety, and sense of place. e) improve interconnectivity between Camberley Train Station and the bus stops on Pembroke Broadway, through high-quality urban design, use of hard and soft landscaping, sightlines and signage. f) enhance visual connectivity between the site and Camberley Town Centre, through layout, arrangement of built form and public space, massing, design, materials and signage. g) be informed by the results of a full Noise Impact Assessment that considers the proximity to the railway line. 		



Policy HA1: Housing allocations			
Site Reference	Site Name / Address	Indicative Homes (Gross)	Net
HA1/07	York Town Car Park, Sullivan Road, Camberley	27	27
Development Requirements	<p>1) Development proposals are required to:</p> <ul style="list-style-type: none"> a) deliver a high-quality, design-led development that is sympathetic to the existing character of the area, and has regard to the design, scale, height, and built-form of the adjacent approved development at Victoria Court, 407-409 London Road And 9-13A Victoria Avenue, Camberley (Application reference: 19/0251). b) incorporate high-quality landscaping, including tree-planting along Sullivan Road, increasing the overall amount of greenery and vegetation in the locality and softening the existing townscape. c) retain and/or re-provide the public car-parking currently on-site. d) incorporate public access from the site to Frimley Road and Victoria Avenue, to encourage permeability and create linkages. 		



Policy HAI: Housing allocations			
Site Reference	Site Name / Address	Indicative Homes (Gross)	Net
HAI/08	Land at Frimhurst Farm, Deepcut Bridge Road, Deepcut, GU16 6RF	65	65
Development Requirements	<p>1) Development proposals are required to:</p> <ol style="list-style-type: none"> a) deliver a high-quality, design-led development that is sympathetic to the existing character of the area. Particular consideration should be given to the enhancement of the character of the Basingstoke Canal Conservation Area. b) incorporate high-quality landscaping, enhancing and retaining the existing treed character of the site, which contribute to local distinctiveness. c) demonstrate that the detailed site layout has been informed by the proximity to the railway flanking the southern boundary of the site regarding safety, noise, and visual barrier effects. d) demonstrate that the detailed site layout has been informed by the proximity to the Basingstoke Canal Conservation Area to the north of the site. e) retain and strengthen the existing tree planting and landscape buffering between the site and the railway line on the southern boundary of the site, to reduce noise and visual impacts from the railway. f) demonstrate that the proximity of the site to the Basingstoke Canal SSSI has been taken into consideration. In particular, mature trees currently on site should be retained where these are considered to support the functioning of the SSSI. 		



Policy HAI: Housing allocations			
Site Reference	Site Name / Address	Indicative Homes (Gross)	Net
HA1/09	Sir William Siemens Square, Chobham Road, Frimley	200	200
Development Requirements	<p>1) Development proposals are required to:</p> <ul style="list-style-type: none"> a) deliver a high-quality, design-led re-development scheme that is sympathetic to the character of the area, providing a density, scale, height and massing appropriate for the local context of Frimley village whilst making the most effective use of the land. b) contribute to the urban greening of the area, providing integrated amenity roof terraces and/or atrium courtyards within the envelope of the development. c) retain the continuous green, rural character of Chobham Road, including the retention of mature trees that contribute to the local distinctiveness. d) incorporate high-quality, integrated hard and soft landscaping, seeking to retain and enhance the geometric layout of the site. e) be sympathetic to and enhance the green, rural character of the neighbouring playing fields. f) be sympathetic to the amenity of neighbouring residential areas. g) incorporate improved pedestrian and cycle access to, and through, the site, with appropriate linkages to Frimley District Centre and the Station. h) provide the maximum number of Gypsy and Traveller pitches or Travelling Showpeople plots that can be reasonably accommodated on the site, having regard to the level of local need within Surrey Heath and the criteria set out within Policy H10. 		



Policy HAI: Housing allocations			
Site Reference	Site Name / Address	Indicative Homes (Gross)	Net
HAI/10	Land west of Sturt Road, Frimley Green	160	160
Development Requirements	<p>1) Development proposals are required to:</p> <ul style="list-style-type: none"> a) retain an undeveloped area of greenspace at the southern extent of the site, providing distinct separation from the settlement of Mytchett. The protected trees in the southern area of the site should be retained as part of this. b) incorporate a landscape buffer along the boundary of the site with Sturt Road. This should include grass verges and tree planting to soften views of the development and reflect the rural character of the land to the east of Sturt Road. c) conserve and enhance the setting of the Grade II listed Church of St Andrews on the opposite side of Sturt Road, improving visual connections with the site. d) retain the historic pump-houses and their setting, reusing the buildings for residential purpose. e) demonstrate that the detailed site layout has been informed by the proximity to the two railway lines that flank the northern and south-eastern boundaries of the site regarding safety and potential noise impacts. f) be supported and informed by a detailed Noise Impact Assessment, which considers potential adverse effects arising from the railway lines. g) demonstrate that the design and layout of the development has been informed by the physical and visual barrier effects of the railway banks and bridges adjacent to the site. h) demonstrate that consideration has been given to traffic safety at Sturt Road, including safe pedestrian and cycle access to Frimley Green Local Centre. i) provide appropriate pedestrian and cycle access to the site, improving linkages to Frimley Green Local Centre and Frimley Lodge Park in particular. j) provide suitable vehicular access from Sturt Road and suitable highways access within the site. k) be supported and informed by a Biodiversity Survey and Report, given the site's proximity to an adjacent SINC. 		



Policy HA1: Housing allocations

	<ul style="list-style-type: none"> l) be supported and informed by an Archaeological Study of the site. m) be supported and informed by a Flood Risk Assessment. Suitable flood mitigation measures, including SuDS, are required to address surface water flooding arising from the proximity to railway banks. n) provide the maximum number of Gypsy and Traveller pitches or Travelling Showpeople plots that can be reasonably accommodated on the site, having regard to the level of local need within Surrey Heath and the criteria set out within Policy H11. 		
Site Reference	Site Name / Address	Indicative Homes (Gross)	Net
HA1/11	Land east of Benner Lane (partial Housing Reserve Site), West End	73	73
Development Requirements	<ul style="list-style-type: none"> 1) Development proposals are required to: <ul style="list-style-type: none"> a) be sympathetic to and integrate with the design and layout of surrounding development at the former West End Reserve Site. b) incorporate a significant landscape buffer along the eastern edge of the site that adjoins the Green Belt, helping to preserve the rural character of the area and providing a soft transitional edge to the developed area. c) retain the Grade II listed Malthouse Farm and its curtilage, and preserve its setting. d) incorporate suitable vehicular access to, within, and through the site. e) provide linkages to West End Local Centre through improved pedestrian and cycle access to the site. f) be supported and informed by an Archaeological Study, Flood Risk Assessment, and Biodiversity Survey and Report. g) be supported and informed by an Heritage Assessment, which ascertains the setting of Malthouse Farm, a C16 timber framed Grade II listed farmhouse with ancillary barn and outbuildings that forms part of the site, and the visual relationship between the historic property and its immediate and wider setting. 		



Policy HAI: Housing allocations			
Site Reference	Site Name / Address	Indicative Homes (Gross)	Net
HAI/12	Housing Reserve Site East of Heathpark Drive, Windlesham	116	116
Description	Outline planning permission has been granted for 140 residential dwellings at the site. A Reserved Matters application has since been submitted for 116 dwellings.		
Development Requirements	<p>1) Development proposals are required to:</p> <ul style="list-style-type: none"> a) incorporate within the design and layout of the proposed scheme, as far as reasonably practicable, soft-landscaping and the retention of existing trees and greenspaces to reflect the verdant wooded character of the site. b) incorporate a significant landscape buffer along the eastern edge of the site, providing a soft edge to the developed area and ensuring a transitional character adjoining the Green Belt. c) provide suitable vehicular access to the site from Woodlands Lane and suitable highways access within and throughout the site. d) provide suitable pedestrian and cycle access from the site to create linkages to Windlesham Local Centre. e) provide a bespoke, on-site SANG to provide mitigation for the impact of the residential development on the Thames Basin Heaths Special Protection Area. Where an on-site SANG cannot be provided, this should be demonstrated to the Council's satisfaction at the planning application stage. f) be supported and informed by an Archaeological Study, Flood Risk Assessment, and Biodiversity Survey and Report. g) provide a community facility and incorporate adequate open space and recreational play provision in accordance with the Council's adopted standards. 		



Policy HAI: Housing allocations			
Site Reference	Site Name / Address	Indicative Homes (Gross)	Net
HA1/13	Chobham Rugby Club, Windsor Road, Chobham, GU24 8LD	91	91
Development Requirements	<p>1) Development proposals are required to:</p> <ul style="list-style-type: none"> a) deliver a high-quality, design-led, sustainable development that is suitable for the location of the site in Chobham village. b) secure a suitable alternative location for the re-provision of the existing community and recreational uses on-site, within the Borough, which would be secured through an S106 agreement with the Council. c) retain an appropriate provision of open green space on-site to be accessible by local residents, which is well-integrated into a network of green infrastructure throughout the site. d) deliver a strong sense of place that reinforces local distinctiveness and provides an attractive and functional living environment, established through a sensitive design that responds to the local context; including the topography and landscape of the area given the open space on and neighbouring the site. e) retain and enhance the local character of the area; incorporating high-quality landscaping that integrates well with the open, treed character of the surrounding area. f) retain and enhance the existing trees that form part of the boundary to the site as far as reasonably practicable. g) deliver a site layout that encourages permeability throughout the site and incorporates suitable pedestrian and cycle access from the site to nearby community facilities; in particular, to encourage linkages to the south toward Chobham high street. h) be sympathetic to the amenity of neighbouring residential areas and to enhance the green, open character of the neighbouring open space to the East. i) incorporate suitable vehicular access to the site from Windsor Road. 		



Policy HA1: Housing allocations

- j) incorporate adequate, high-quality open space and Areas of Plan on-site, in accordance with the Council's adopted standards.
- k) deliver a network of high quality, attractive streets and spaces that are convenient and safe to use.
- l) provide appropriate rainwater management through SuDs integrated with landscape design to visually and environmentally enhance the public realm.
- m) incorporate wildlife habitat creation and enhancements, including through the use of bird boxes, bat boxes, swift bricks and beehives in appropriate locations within the development.

Camberley Town Centre Strategic Sites

Site Name / Address	Policy Reference	Indicative Number of Homes (Gross)	Net
London Road Regeneration Block, Camberley	Refer to Policy HA2 for further detail	576	550
Land East of Knoll Road, Camberley	Refer to Policy HA3 for further detail	475	475

Strategic Site – Mindenhurst, Deepcut

Site Name / Address	Policy Reference	Indicative Number of Homes (Gross)	Net
Mindenhurst, Former Princess Royal Barracks, Deepcut	Refer to Policy HA4 for further detail	1200	1098



Policy HAI: Housing allocations	
Sites Promoted for Extra Care or Residential Care Uses	
Site Name / Address	Development Requirements
HA01/14 Pinehurst, 141 Park Road, Camberley	<ol style="list-style-type: none"> 1) Development proposals are required to: <ol style="list-style-type: none"> a) be sympathetic to and integrate with the design of surrounding development. b) provide high-quality, usable communal amenity spaces. c) incorporate high-quality landscaping, retaining and enhancing the existing treed character of the site's boundaries, which contributes to local distinctiveness. d) provide suitable vehicular access to the site and suitable highways access within the site. e) provide suitable pedestrian and cycle access from the site to create linkages to Camberley Town Centre.
	<ol style="list-style-type: none"> 2) Development proposals for residential (C3) or extra-care (C2) use on these sites are required to clearly identify how the proposed development addresses the identified site-specific considerations or requirements. 3) Where development proposals cannot clearly demonstrate that the identified site-specific considerations or requirements have been addressed, the planning application will be refused.

- 3.14. Spatial Strategy Policy SS1 sets out the Borough's housing supply position, demonstrating how the local housing need will be delivered over the plan period (2019 – 2038). Policies HAI, HA2, HA3, and HA4 identify the main opportunities for the development of housing within the Borough. The remainder of the local housing need will be delivered on sites identified through the Council's Strategic Land Availability Assessment, including windfall development sites, which will be updated annually throughout the plan period.
- 3.15. The Council's spatial strategy seeks to make the most effective use of previously developed land in sustainable locations. Strategic housing allocations are identified in Camberley Town Centre and at Mindenhurst, the former Princess Royal Barracks in Deepcut. Allocated sites have been assessed within the Council's Sustainability Appraisal throughout the plan-making process. These assessments have informed the identification of site-specific considerations for developers.



- 3.16. The information set out against each proposed allocation is not a formal development brief. Any proposals coming forward on these sites will be assessed against all Local Plan policies and other material considerations relevant at the time of application. The Council may require developers to provide more information or include measures that are not specifically identified within the allocation policies.

Policy HA2: London Road Block Site Allocation

- 3.17. The London Road Block is a key development site within Camberley Town Centre, which provides an opportunity for a major, residential-led regeneration scheme. The site forms one of the largest areas of brownfield land in the Borough that is available for development within the Local Plan period. Owned by Surrey Heath Borough Council, regeneration of the London Road Block site will revitalise an underutilised area of Camberley Town Centre, providing a contemporary, sustainable, mixed-use development, with an attractive and accessible public realm.
- 3.18. Centrally positioned within Camberley Town Centre, south of London Road (A30), between Park Street and the High Street, the site comprises a number of buildings fronting London Road, the High Street, and Park Street, which accommodate retail and food and drink uses, with some residential accommodation above the ground-floor level. The site also includes the northern part of The Square shopping centre, focused on Obelisk Way, and the associated service and parking areas.
- 3.19. Regeneration of the London Road Block will improve the integration of services for the public within the Town Centre area and provide high-quality residential development. The London Road Block development provides an opportunity to deliver a dynamic and sustainable area for living, working and visiting, with direct pedestrian links to the Square Shopping Centre, the High Street, Camberley Station, and London Road. A masterplan must be produced for the site, which must be prepared in consultation with, and agreed by, the Council.

Policy HA2: London Road Block, Camberley Town Centre

Site area: 1.3ha

- 1) The London Road Block site is allocated for comprehensive, residential-led, mixed-use redevelopment, comprising:
 - a) approximately 550 new homes (net) with supporting infrastructure,
 - b) an appropriate mix of Town-Centre uses with well-integrated services,
 - c) the creation of a high-quality public realm.



Policy HA2: London Road Block, Camberley Town Centre

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

3) Development proposals are required to:

Housing

- a) deliver approximately 550 new homes (net);
- b) provide a minimum of 40% affordable housing, in accordance with Policy H7 (subject to detailed viability assessment);
- c) deliver an appropriate mix of new homes, reflecting the evidence in the most up-to-date Housing Need Assessment, whilst having regard to the Town Centre location and the need to provide flatted development.
- d) deliver a combination of predominantly flatted development and elements of townhouses, recognising the Council's ambition to significantly increase density within the Town Centre, and make efficient use of land

Commercial and Community Uses

- e) incorporate a mix of commercial, retail, leisure, and community uses appropriate for the urban location, supporting the viability and vitality of Camberley Town Centre, including:
 - i. small-scale retail uses and financial and professional services,
 - ii. restaurants and cafés, and
 - iii. office floorspace comprising conventional offices and/or flexible co-working space.
- f) demonstrate that consideration has been given to incorporating the following uses within the development:
 - i. a library and learning centre, and other community and health uses; and
 - ii. cultural, civic and leisure facilities.
- g) incorporate active frontages at the ground-floor level as appropriate, to enliven the development and provide an animated and vibrant streetscape;

Improved Public Realm

- h) deliver a comprehensively-planned public realm that is coherent, inclusive, safe and attractive, which includes;
 - i. new public open space providing a variety of scale and character, designed with high-quality, durable materials for everyone to enjoy
 - ii. attractive and multi-purpose street furniture, utilising cutting-edge green technology,



Policy HA2: London Road Block, Camberley Town Centre

- iii. appropriate outdoor lighting, water features, and signage,
- iv. public art, both permanent and temporary, and
- v. significant landscaping, which incorporates mature tree-planting and vegetated areas;
- i) deliver a public realm that reinforces local distinctiveness and create a positive sense of place;
- j) deliver a network of high quality, attractive streets and spaces that are convenient and safe to use;
- k) contribute to a better experience for all transport modes in the town centre, in particular walking and cycling;
- l) provide an enhanced gateway into Camberley Town Centre from London Road, which incorporates an attractive promenade with a sequence of hard and soft landscaped gardens that lead into The Square Shopping Centre;
- m) incorporate buildings of an appropriate scale, proportion, and architectural character, to enhance and reinforce a new, high-quality public square, which focuses on community and civic activity;
- n) deliver a widened and transformed streetscape fronting London Road, which incorporates mature tree-planting, sheltered waiting areas, pedestrian and cycle zones, taxi zone, drop off, a new bus stop and attractive hard-landscaping that differentiates the distinct zones;
- o) provide improved pedestrian accessibility between the High Street, Park Street, London Road, and Camberley's main public transport terminus at Pembroke Broadway;

Design and Character

- p) provide a new, urban quarter within Camberley Town Centre that is dynamic, and animated, containing retail, commercial, cultural and community uses with a contemporary, sustainable and distinctive building design, whilst reinforcing and complementing the established surrounding town centre areas;
- q) deliver an attractive and vibrant urban living environment where bespoke built form, integrated blue and green infrastructure, distinct views and a variety of high quality materials and landscaping are all well integrated and contribute to a dynamic environment for everyone to enjoy who lives, works and visits Camberley;



Policy HA2: London Road Block, Camberley Town Centre

- r) provide a development of high quality architectural standards, appropriate scale, height and massing with an average building height of 4 – 7 storeys, incorporating up to two landmark buildings with a maximum building height of 15 storeys, taking into account external views from the flatted development,
- s) incorporate buildings of no more than 3 storeys on the High Street frontage, which complement the historic Edwardian and Victorian character of this part of the town centre
- t) deliver a development which benefits from sustainable design and flexible layouts that permits adaptation over time, durable materials, sustainable construction methods, and the integration of roof gardens and vertical greenery, especially along London Road.
- u) demonstrate that the proposed development is consistent with locally adopted Design Codes;
- v) incorporate adequate open space and recreational play provision in accordance with the Councils adopted standards.

Transport Infrastructure

- w) provide appropriate contributions toward highways and public transport improvements³⁸;
- x) incorporate improved transport infrastructure, comprising:
 - i. improvements to the London Road junctions with the High Street and Park Street and the creation of pedestrian friendly areas at Obelisk Way (east) and the High Street (north).
 - ii. improved pedestrian and cycle links between the High Street and Park Street, and London Road to the Square Shopping Centre;
 - iii. provision of a new bus stop and taxi rank at the London Road gateway;
 - iv. improved pedestrian and cycle links along the London Road
 - v. potential provision of a short-stay drop-off/pick-up point and on-street disabled parking located at the London Road gateway, which provides electric vehicle charging capacity for all parking spaces;
 - vi. support for accessible and well-connected bus services to the London Road Gateway;
 - vii. appropriate accesses for service vehicles that are convenient for

³⁸ Further detail of the mitigation required will be explored through further work in the Infrastructure Delivery Plan (IDP) following completion of the Transport Assessment.



Policy HA2: London Road Block, Camberley Town Centre

use but designed discreetly to ensure they do not detract from the attractiveness of the new development;

Infrastructure

- y) provide mitigation for the additional pressure on education provision;
- z) provide mitigation for the impact of increased pressure on healthcare services in consultation with healthcare providers;
- aa) provide suitable, well integrated parking provision in accordance with adopted parking standards for the proposed land uses, and reflecting the town centre location, along with provision of adequate public car and cycle parking to serve the wider town centre and to meet the needs of residents and visitors;
- bb) incorporate measures to provide a green urban environment, such as green roofs, green walls, and both public and private garden amenity space for flatted development;

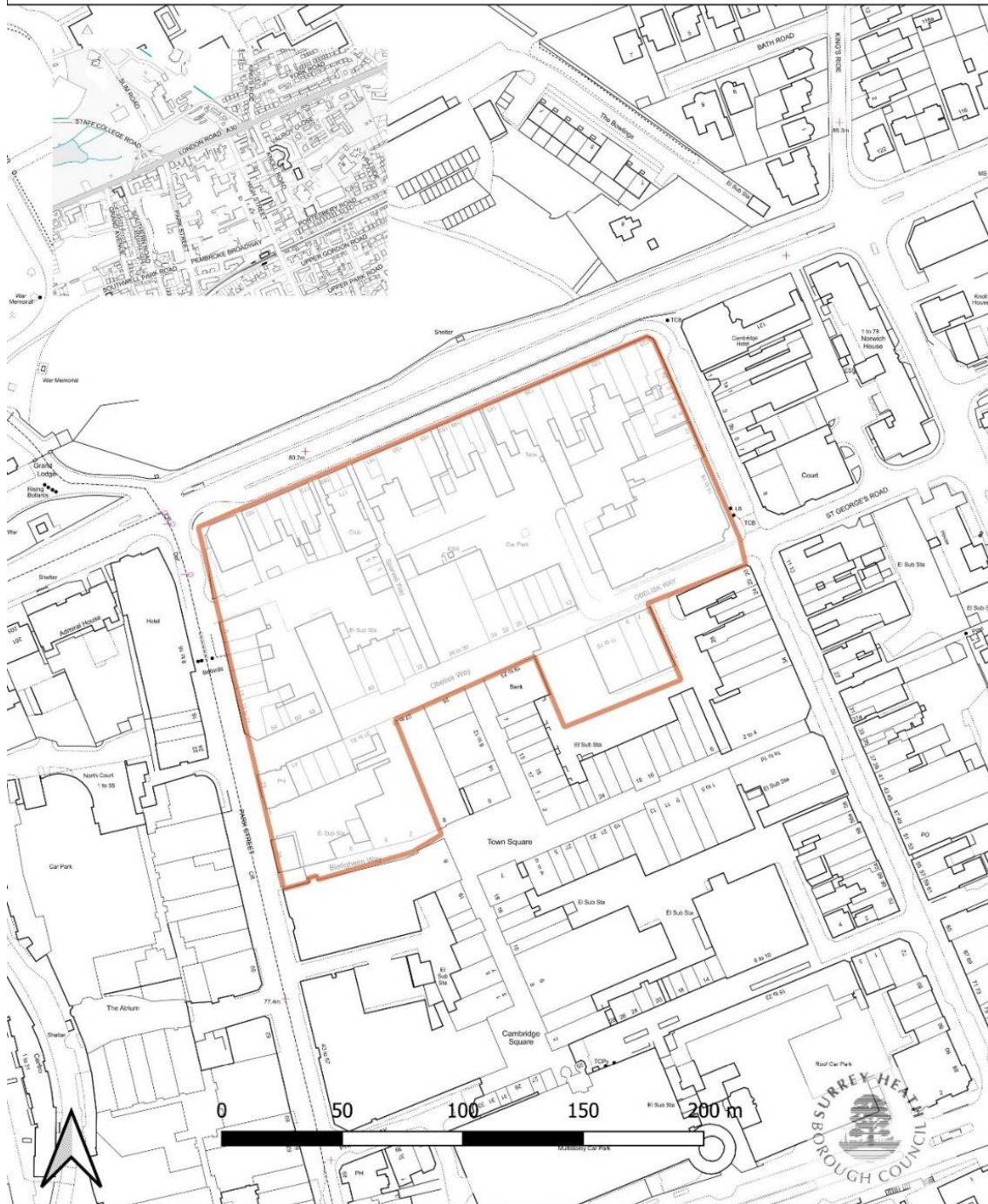
Environmental Requirements and Climate Change

- cc) Measures to avoid and mitigate any impact of the development on the Thames Basin Heaths Special Protection Area through the delivery of a suitable off-site SANG solution;
- dd) utilise net zero carbon design, including on-site renewable energy and/or decentralised energy generation;
- ee) incorporate wildlife habitat creation and enhancements, including through the use of bird boxes, bat boxes, swift bricks and beehives in appropriate locations within the development;
- ff) provide appropriate rainwater management through SuDs integrated with landscape design to visually and environmentally enhance the public and private realm.



Figure 4 – Allocation Site Map

London Road Block, Camberley Not to Standard Scale



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Reasoned Justification

- 3.20. The redevelopment of the London Road Block site provides an opportunity to deliver a new town-centre community within a landmark development that forms the northern gateway to Camberley Town Centre. Given the scale of the site, site-wide master planning and Design Codes³⁹ should be prepared in consultation with the Council and agreed prior to the submission of a planning application.

Mix of uses

- 3.21. Towns, high streets, and shopping centres, across the UK have faced challenges for over a decade from falling market demand, rising occupancy costs and increasing competition from online and out-of-centre shopping. These trends have been further accelerated and compounded by the COVID-19 pandemic. Consequently, the Town Centre Uses and Future Directions Study⁴⁰ identified that there is no potential capacity ('need') for new retail (convenience and comparison goods) floorspace.
- 3.22. The redevelopment of the London Road Block therefore provides an opportunity to condense the existing retail floorspace with the provision of high-quality units over a reconfigured footprint. Given the conclusions of the Future Directions Study, the site offers an opportunity to maximise residential provision in the Town Centre to improve its vitality and viability, whilst providing appropriate synergistic main town centre land uses.
- 3.23. Regeneration of this site should seek to deliver approximately 550 (net) new homes, with a minimum of 40% of these being affordable. Residential development should optimise the use of the land, given the sustainable location in Camberley Town Centre, delivering predominantly flatted development.
- 3.24. The mix of new homes delivered through this redevelopment scheme should reflect the evidence as set out in the most up-to-date Housing Needs Assessment (see Policy HA5: Range and Mix of Housing). However, this should be balanced with the recognition of the sustainable location of the site and the need to optimise land use. Therefore, residential development should largely comprise flatted development, with townhouses incorporated where appropriate.

³⁹ Consideration will be given to adopting these as a Supplementary Planning Document

⁴⁰ Available online at: www.surreyheath.gov.uk/residents/planning/planning-policy/evidence-base.



- 3.25. Although predominantly residential, the development of this site provides an opportunity to build a new community and incorporate a mix of town-centre uses that would create a vibrant new quarter in the heart of the town. To achieve this, development proposals should incorporate appropriate town-centre uses throughout the development, including; office and/or flexible co-working floorspace, professional, financial and institutional services, new restaurants, cafés and cultural and civic services/amenities.
- 3.26. Development proposals should also deliver excellent new public open spaces throughout the site, to be enjoyed by the new community and those who live in, work in, and visit Camberley Town Centre. Additionally, car and parking facilities, including the provision of electric vehicle charging points, must be provided in line with the parking standards as established in the emerging Surrey Heath Parking Standards Supplementary Planning Document (SPD).
- 3.27. Main Town Centre uses should be delivered at the ground-floor level throughout the development, providing an active frontage and enhancing the town centre with a diverse range of uses within the heart of Camberley. This will assist with the consolidation of the range of retail, commercial, and civic amenities offered within Camberley Town Centre. The provision of restaurants, cafés and small-scale retail units at the ground-floor level should be utilised to create an animated and active public realm throughout the daytime and into the evening. The relocation of Camberley Library, and the Council Offices should be considered, providing an opportunity for the creation of a new civic hub in the heart of Camberley, including a new combined library and lifelong learning facility, incorporating meeting rooms, classrooms and exhibition space.

Design and Public Realm

- 3.28. The London Road frontage of the site should be enhanced, providing an attractive and distinct new northern gateway to the Town Centre, characterised by high quality, contemporary architecture, well integrated placemaking and urban greenery.
- 3.29. The existing town centre is dominated by the enclosed Square Shopping Centre, which closes in the evening, making it difficult to travel on foot between the Atrium at Park Street and the High Street, which are the two main areas offering evening dining, leisure and entertainment. The redevelopment of the London Road Block provides opportunities to introduce new linkages within the town centre, improving connectivity between these two areas, and establishing improved permeability throughout, providing easy access to local green areas and parks, the new leisure centre and the new station.



- 3.30. Optimising the development of this town-centre site, buildings should broadly range from 4 to 7 storeys in height, in accordance with the relative character of the different areas surrounding the site. An attractive, pedestrian promenade with refreshing greenery and water features should be accommodated between the London Road and the Atrium. Additionally, two landmark buildings of up to 15 storeys should be incorporated at key, central locations within the site to create a focal point as seen from London Road and to frame the new public open place with a wide range of community and cultural activities in front of The Square shopping centre.
- 3.31. Streetscape improvements should be delivered also to the roads surrounding the allocated site, including the High Street, Park Street and London Road, creating a vibrant, high quality public realm. This will help provide improved permeability within the town centre through a coherent, pedestrian friendly street network. A new key pedestrian artery running north to south through the London Road Block will connect Camberley town centre with London Road, also establishing improved linkages to Pembroke Broadway, where Camberley's main public transport terminus is located and the new leisure centre, the Atrium.
- 3.32. The streetscape within and adjoining the site will need to be enhanced by high quality hard and soft landscaping and robust tree planting. Flexible public open space should also be provided at the heart of the site, with the capacity to accommodate a range of activities such as farmer's markets, public exhibitions and community and cultural events, and as a sequence of places along Park Street.
- 3.33. Camberley High Street retains elements of the original Victorian and Edwardian character of Camberley as a late 19th century settlement adjoining the Royal Military Academy. Development within the vicinity of this historic road should respect and complement its surrounding environment, and development fronting the High Street should be no taller than three storeys.
- 3.34. The existing High Street spur road along the London Road frontage should be transformed into a tree-lined boulevard, with separate pedestrian and cycle lanes and a new, additional bus stop and taxi zones close to the northern gateway site entrance. Pedestrian and cycle linkages should also be provided to nearby green spaces such as Camberley Park and The Obelisk, and the new Places Leisure Camberley at the corner of London Road and Grand Avenue. These linkages should provide connectivity to the new green corridor that will be delivered as part of Surrey Heath's wider green network, connecting the central core of the town centre to the valuable green spaces surrounding site allocation HA3, Land East of Knoll Road.



Sustainable Design and Energy

- 3.35. New development at the site will be required to meet a net zero carbon output through either on-site renewable energy provision, decentralised energy generation, or a combination of both measures. The submission of an Energy Statement demonstrating how this will be achieved in the proposal must be submitted as part of the proposal for the site's redevelopment.
- 3.36. The orientation of buildings, the detailed construction and design, the choice of building materials and construction methods should be sustainable and meet BREAAAM very good (residential) and excellent standards (commercial).
- 3.37. Actively involving the local community in the construction, for example by engaging apprentices and arranging training schemes in construction, should be a priority. Equally, engaging local artists and local colleges in the development of public art in the scheme is also a strong ambition.
- 3.38. All rainwater should be managed by sustainable drainage systems (SuDs) such as swales, green roofs, permeable paving, rainwater harvesting and water butts, which should be integrated within the public realm, and provide visual enhancements to their surroundings.
- 3.39. The development should deliver a green urban environment, which provides environmental and ecological benefits and a biodiversity net gain. To facilitate this, the following will be encouraged:
1. tree planting and vegetation within public areas;
 2. spacious green courtyards containing tree planting in semi-private or private residential areas; and
 3. green roofs, green walls and roof gardens in both public and private areas.
- 3.40. The inclusion of green roofs and green walls should also be considered as measures to improve energy efficiency through the natural insulation they create for buildings, retaining heat in the winter and providing natural cooling in the summer.
- 3.41. The establishment of a green urban environment will also provide opportunities for wildlife habitat creation and the ecological enhancement of the site. Measures to encourage wildlife should include the provision of bird boxes, bat boxes, swift bricks and beehives at appropriate public and private locations within the development.
- 3.42. Owing to the site's town centre location surrounded by established existing uses and with very limited adjoining available land, suitable SANGs provision must be provided off-site, to mitigate the impact of the new residential development on the Thames Basin Heaths Special Protection Area.



Policy HA3: Land East of Knoll Road Site Allocation

- 3.43. The 'Land East of Knoll Road' site is a 2.44 hectare site, located on the eastern edge of Camberley Town Centre. The site comprises predominantly brownfield land, with some areas of open green space. Existing buildings within the site comprise a mix of civic, institutional, and community uses; including Surrey Heath Borough Council's offices, Camberley Library, and the former Portesbery School.
- 3.44. Surrey Heath Borough Council and Surrey County Council are the landowners of the site. Given the sustainable town-centre location, the site provides a key opportunity to regenerate an underutilised area of publicly owned land, for a residential-led development with supporting infrastructure. The redevelopment of this site will enable the existing civic uses, currently operating at the site, to be re-provided in a more centrally-located area of Camberley Town Centre.

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

Site area: 2.44 ha

- 1) The site is allocated for comprehensive, residential-led redevelopment to create a vibrant new residential quarter within Camberley Town Centre, comprising;
 - a) approximately 475 new homes (C3), with supporting infrastructure and an enhanced public realm, and
 - b) the protection and enhancement of the existing designated green space at Camberley Park.
- 2) Development proposals are required to accord with a masterplan for the site that is agreed by the Council.
- 3) Development proposals are required to provide:

Housing

- a) approximately 475 new homes (net);
- b) a minimum of 40% affordable housing in accordance with Policy H7 (subject to detailed viability assessment);
- c) an appropriate mix of new homes, reflecting the evidence in the most up-to-date housing need assessment, whilst recognising the town-centre location;
- d) flatted development adjoining Knoll Road comprising 4 – 7 storeys (inclusive), reflecting the urban character of the area;
- e) an appropriate mix of townhouses and small-scale flatted development at the former Portesbery School and adjoining Camberley Park, reflecting the verdant, wooded character of the area;



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

- f) parking provision in accordance with adopted parking standards, reflecting the town centre location, providing adequate public, private and on-street vehicle and cycle parking to meet the needs of residents and visitors;

Public Realm

- g) high-quality public realm throughout the site, which provides improved permeability to the site from Knoll Road, including improved pedestrian, cycle, and vehicular links to Camberley High Street, London Road Block, and Camberley Station;
- h) an attractive new streetscape throughout the site, which utilises hard landscaping to differentiate pedestrian, cyclist, and vehicular zones, and soft landscaping incorporating mature tree planting and vegetated areas;
- i) a green corridor linking the site to Knoll Road and Camberley High Street, incorporating Camberley Park and adjoining woodland to the east, providing an enhanced green enclave within Camberley Town Centre, for residents and visitors to enjoy;

Design and Character

- j) a strong sense of place, with a distinctive, attractive, and functional living environment, established through a sensitive design that responds to the local context, including topography, landscape, and heritage;
- k) the protection and enhancement of the Grade II Listed Obelisk and its setting within a wooded part of Camberley Park;
- l) a design and layout that ensures new sightlines between the wooded setting of The Obelisk and the heart of Camberley Town Centre are established;
- m) demonstrate that the proposed development is consistent with locally adopted Design Codes;

Transport Infrastructure

- n) appropriate contributions toward highways and public transport improvements;
- o) a site layout that encourages permeability throughout the site and to surrounding areas;
- p) transport infrastructure comprising:
 - i. vehicular accesses to the site from Knoll Road to the west and Hillside to the southeast;
 - ii. differentiation of user zones and crossings through changes to the materials and colours used for surfacing;
 - iii. improved pedestrian and cyclist links between the site and Camberley High Street, and Camberley Station, with suitable



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

- crossing points implemented at Knoll Road;
- iv. improvements to the streetscape of Knoll Road, delivering psychological traffic calming measures through design and surfacing changes to provide a pedestrian and cyclist friendly environment;
- v. the retention of existing bus stops at Knoll Road and improved pedestrian access to Camberley Train Station, seeking to encourage residents and visitors to use public transport;
- vi. support for accessible and well-connected bus services to Knoll Road;

Infrastructure

- q) mitigation for additional pressure on education provision⁴¹;
- r) mitigation for the impact of increased pressure on healthcare services in consultation with healthcare providers;
- s) the protection and enhancement of the existing designated green space at Camberley Park including the wooded setting of the Grade II Listed Obelisk;
- t) measures to provide a green urban environment, such as green roofs, green walls, and both public and private garden amenity spaces, including children's play space, for flatted development;
- u) a distinct green corridor along the Eastern side of Knoll Road.
- v) a green corridor incorporating Camberley Park and The Obelisk, which will form part of the wider green infrastructure network in Surrey Heath, enhancing the ecological value of the site's surroundings and contributing to overall biodiversity net gain;
- w) the retention and expansion of the play area facilities at Camberley Park including woodland trails, an equipped play area and open space;

Environmental Requirements and Climate Change

- x) measures to avoid and mitigate any impact of the development on the Thames Basin Heaths Special Protection Area through the delivery of a suitable off-site SANG solution;
- y) a net zero carbon design including on-site renewable energy and/or decentralised energy generation;
- z) wildlife habitat creation and enhancements including bird boxes, bat boxes, swift bricks and beehives in appropriate locations within the development;
- aa) appropriate rainwater management through SuDs integrated with landscape design to visually and environmentally enhance the site.

⁴¹ Details of the mitigation required will be explored through further work in the Infrastructure Delivery Plan (IDP).



Reasoned Justification

Site Description

- 3.45. The 'Land East of Knoll Road' site has previously been allocated under Policy TC18 of the Camberley Town Centre Area Action Plan 2011-2028. In this allocation, the site was divided into two principal areas. Housing development was allocated at the former Hillside Centre, the former Portesbery School, and the former Camberley Police Station. The remaining area of the site was allocated for the reprovision of civic, cultural and community uses.
- 3.46. Following the allocation of the site, the former Camberley Police Station has been redeveloped to provide 35 new homes, whilst the former Portesbery School and Hillside Resource Centre remain vacant. The Council now intends to relocate the existing civic uses at Surrey Heath House and Camberley Library to a more central location within Camberley Town Centre. Consequently, the site provides a significant opportunity for comprehensive residential development, creating a new community within a sustainable town centre location.

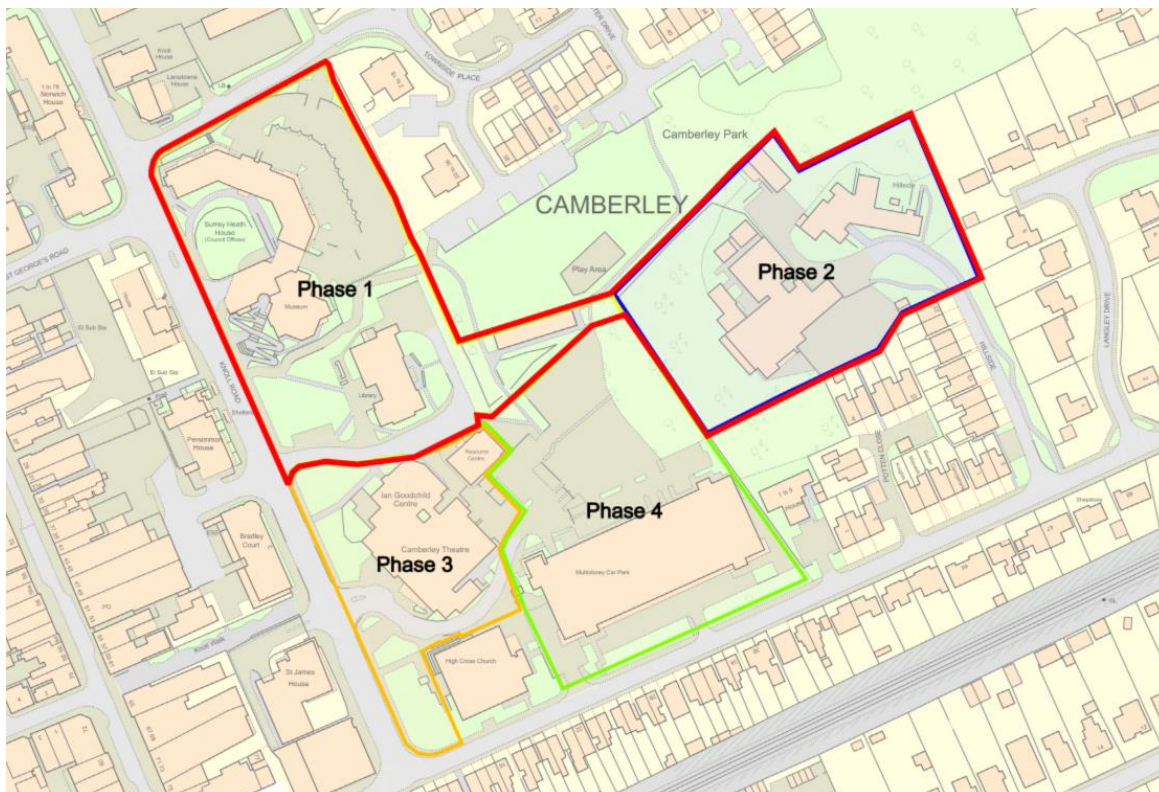
Further Opportunity Area

- 3.47. The allocated site comprises a 2.44 hectare area, which currently comprises the Surrey Heath Borough Council offices, Camberley library, and the former Portesbury School. Camberley Theatre and the Knoll Road Multi-Storey Car Park, amongst other uses, adjoin the site to the south-east, comprising a further 1.77 hectare opportunity area. The further opportunity area is not expected to be developed within the plan period and is therefore not allocated in this Local Plan. This area will be reassessed in terms of its deliverability during any Local Plan review.
- 3.48. However, the Land East of Knoll Road site and the further opportunity area together provide an opportunity to comprehensively redevelop the area to provide a new residential quarter at the edge of Camberley Town Centre. Although the delivery of the allocated site area is not contingent on the delivery of the further opportunity area, development proposals should be designed in accordance with a broader masterplan for the whole site area, which must be prepared in consultation with the Council and receive agreement from the Council. Any masterplan for the wider site should include provision for a new high quality public square in front of the High Cross Church, connecting to Knoll Walk.



3.49. Consequently, the comprehensive redevelopment of the Land East of Knoll Road area is expected to be brought forward in four distinct phases, as shown on Figure 6 below. Phases 1 and 2 are expected to be delivered within the plan period and are therefore allocated. Phases 3 and 4 are capable of being delivered beyond the plan period and are therefore not allocated at this stage. Phase 1 is expected to deliver approximately 488 new homes, comprising flatted development of 4 – 7 storeys. Phase 2 is expected to deliver approximately 34 new homes, comprising predominantly terraced townhouses.

Figure 6 – Phased Delivery of the Land East of Knoll Road Residential Quarter



Redevelopment Opportunities and Requirements

- 3.50. Land East of Knoll Road will be redeveloped to create a high quality, residential-led quarter, providing an attractive environment for living and visiting, with distinct pedestrian links to the rest of the town centre, in particular Camberley High Street, Camberley station and the London Road development. The new development will have a high quality and cohesive public realm. The existing green link from Camberley High Street to the Grade II Listed Obelisk will be retained and reinforced, forming part of a new green corridor with improved access from the central core of Camberley Town Centre to Camberley Park, including The Obelisk and its wooded setting. These important green spaces will be preserved for residents of the new development and members of the public to enjoy. The expanded and enhanced green corridor will extend from Camberley High Street in the west along Bissingen Way to The Obelisk in the east, and should be characterised by mature tree planting, vegetation, grassland and other appropriate types of green infrastructure.
- 3.51. Development adjoining Camberley Park and the wooded areas of the site will need to be sensitive to the green and tranquil character of these localities. The streetscape design in proximity of these areas should therefore incorporate soft landscaping and tree planting to reflect this. To retain and enhance the setting of The Obelisk, the layout and massing of residential development must provide enhanced sightlines towards this statutory heritage asset from other areas of the town centre, particularly at viewpoints directly to the west of The Obelisk on Knoll Road, Bissingen Way, and the High Street.
- 3.52. The existing green frontage along the eastern side of Knoll Road including the large mature trees from Camberley Theatre to Surrey Heath House should be retained and enhanced with additional tree planting. To help ensure the retention of existing trees, an arboricultural report and tree management plan should be submitted for the entire site area as part of the development proposal for the site.
- 3.53. To make efficient use of land in a sustainable town centre location, flatted residential development up to 6 storeys will be supported in the area adjoining Knoll Road. Building heights and densities at the eastern part of the site should be lower, with a greater number of dwellinghouses. The mix of housing should, subject to site constraints, have regard to the findings of the Housing Needs Assessment (see Policy H5).



- 3.54. The design of buildings in this locality will need to take account of the surrounding green areas including Camberley Park, and adjoining woodland and open spaces. Overall, there should be a gradual decrease in the density of development from west to east, with lower densities at the part of the site furthest from the central core of Camberley Town Centre. Parking provision should reflect the town centre location and will need to be in accordance with adopted standards to be set out in the Councils emerging Parking Standards SPD. The limited parking provision should be supplemented by the use of a car club scheme that is open to all residents of the development.
- 3.55. Sustainable development, which takes account of layout, orientation of buildings, sunlight, daylight, technical specifications and materials to increase energy efficiency and reduce energy and water consumption will be expected. Development should also demonstrate a high quality architectural design with a distinctive, attractive and functional living environment and a sensitive design response to the local context including the topography of the site, which rises to the east. The street layout and pattern should be designed so that it enables permeability throughout the site and to adjoining areas for pedestrians and cyclists. Accordingly, the number of no-through roads should be limited to the minimum number that is achievable having regard to the site's shape and size.
- 3.56. New development at the site will be required to meet a net zero carbon output through either on-site renewable energy provision, decentralised energy generation, or a combination of both measures. The submission of an Energy Statement demonstrating how this will be achieved in the proposal must be submitted as part of the proposal for the site's redevelopment. Rainwater management will need to be provided at the site through the implementation SuDs such as swales, green roofs, balancing ponds, reed beds, permeable paving and water butts. It will be necessary for SuDs to be integrated within the site's landscaping and natural environment, providing blue infrastructure which visually and environmentally enhances the site.
- 3.57. In addition to existing green spaces at the site which will be retained, a green urban environment will need to be provided as part of the development, contributing to the character of the area and helping to achieve overall biodiversity net gain. Urban greening will help to provide both environmental and ecological benefits at the site. The inclusion of green roofs, green walls, residential gardens for dwelling houses and both public and private garden amenity spaces for flatted development will be encouraged. Green roofs and green walls should also be considered as measures to improve energy efficiency through the natural insulation they create for buildings, retaining heat in the winter and providing natural cooling in the summer.



- 3.58. The inclusion of a green urban environment will also provide opportunities for wildlife habitat creation and the ecological enhancement of the site. Measures to encourage wildlife should include the provision of bird boxes, bat boxes, swift bricks and beehives at appropriate locations within the development. These could be introduced either at existing green spaces to be retained, or as part of the new green urban environment.
- 3.59. Improvements to the streetscape of Knoll Road and connecting streets, such as the section of Portesbery Road up to the High Street, are required to reduce the speed of traffic, increase safety for pedestrians and cyclists, and to create a more pedestrian friendly townscape character that is less car dominated. The streetscape design should also enhance visual and physical connectivity to Camberley High Street and Camberley Station, where possible.
- 3.60. Knoll Road currently acts as a barrier between the site and the rest of the town centre. Required streetscape upgrades will need to ensure that Knoll Road becomes more permeable for those crossing between the central core of Camberley and the site. This should be achieved using hard landscaping materials, pedestrian and cyclist crossings and psychological traffic calming measures based on shared space principles. Such measures will help encourage visitors to use the site's adjoining green resources, providing access to an attractive green enclave within Camberley Town Centre, for visitors and residents to enjoy.
- 3.61. Owing to the site's town centre location surrounded by established existing uses and protected green spaces including existing recreation uses and protected woodland, suitable SANG provision will be provided off-site, to mitigate the impact of the new residential development on the Thames Basin Heaths Special Protection Area.



Policy HA4: Mindenhurst, Deepcut Site Allocation

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

Policy HA4: Mindenhurst, Deepcut

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



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

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

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



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

- 3.65. A hybrid Planning Permission was granted in 2014 (application no. 12/0546) for 1,200 residential units and other uses including retail and community facilities, and public open space. The community facilities include a replacement church hall, a sports hub and a public house with significant new green infrastructure comprising allotments, formal and informal open space and Suitable Alternative Natural Greenspace. The scheme also provides access improvements to the Basingstoke Canal.
- 3.66. Since 2014 there have been a series of S73 applications and Non-Material Amendments providing alterations to the scheme as originally submitted. The Phase I Reserved Matters and site wide Design Codes were approved in 2016 and development of the first residential units at the site commenced during the monitoring year 2018-19. Further phases of the development, including supporting infrastructure, have also been approved, for example the public house, with elements of the scheme that have been completed, or substantially progressed to date (as at April 2021) including:
1. 58 new dwellings as at March 2020;
 2. Two form entry Primary School (420 pupils) and nursery (52 pupils) – handed to Surrey County Council in January 2021;
 3. Central SANG;
 4. Improved access to the Basingstoke Canal;
 5. Village Green and play area;
 6. Highway improvements.
- 3.67. The majority of the remaining development will take place in the first 10 years of the plan period with further information on delivery set out in the Housing trajectory in Appendix 2. Further information on the phasing of infrastructure is set out in the Surrey Heath Interim Infrastructure Delivery Plan. Delivery of infrastructure to support the development will either be on site (such as the primary school) or through financial contributions for improved capacity off site and/or for on-going infrastructure maintenance, such as for surface water drainage systems.
- 3.68. Affordable housing on the remainder of the site will be delivered in accordance with planning permission 21/0004/DTC which includes a review mechanism.



Policy H5: Range and Mix of Housing

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

POLICY H5: Range and Mix of Housing

General Housing Mix

- 1) Proposals for residential development will be permitted where they meet a range of accommodation needs in Surrey Heath through the provision of a mix of tenure, type and size⁴² of dwellings that:
- a) reflects the housing need, set out in the Housing Need Assessment (2020)⁴³ or any subsequent update;
 - b) has regard to the size, characteristics and location of the site; and
 - c) is compliant with the percentages for affordable housing provision set out in Policy H7.

Accessible and Adaptable Homes

- 2) Homes should be adaptable and accessible for changing needs over time so that people can be enabled to stay in their homes for longer. To build homes that are accessible and adaptable, all proposals for residential development should meet Building Regulations Part M4(2)⁴⁴, unless it can be robustly demonstrated it would not be possible to do so due to site-specific circumstances.

⁴² Dwelling size is measured by the number of bedrooms to be provided in each dwelling.

⁴³ Surrey Heath Housing Need Assessment 2020:
www.surreyheath.gov.uk/sites/default/files/Surrey%20Heath%20Housing%20Needs%20Assessment%202020.pdf.

⁴⁴ Or any subsequently amended standards for accessible and adaptable dwellings or wheelchair user dwellings.



- 3) On sites of 20-50⁴⁵ or more net new dwellings, at least 5%⁴⁶ of new homes should meet Building Regulations M4(3)44, unless it can be robustly demonstrated it would not be possible to do so due to site-specific circumstances.

Self-Build and Custom Housebuilding

- 4) Development proposals for 20 or more net new dwellings will be expected to make available 5%⁴⁷ of the total homes for sale as serviced plots for self-build and custom housebuilding, whilst there is an identified need⁴⁸ for this type of housing in the Borough.
- 5) Proposals for 20 or more net new dwellings that do not satisfy the above requirement may be supported provided they are justified in relation to evidence of housing need, viability, or site-specific physical or environmental constraints.
- 6) Proposals for standalone self-build or custom build developments in appropriate locations within settlement areas will also be supported.
- 7) The need to grant planning permission for self-build and custom-build homes is measured from the number of entrants on Part I of the Council's Self-build and Custom-Housebuilding Register. Entrants to the Self-Build and Custom Housebuilding Register must meet the Council's Local Connection Test and Financial Solvency Test in order to be eligible for inclusion on Part I of the Register.

Build to Rent Homes

- 8) Proposals for build to rent schemes will be permitted provided they:
 - a) are suitably located;
 - b) meet an identified local demand;
 - c) include provision of a minimum 20% affordable private rented accommodation; and,
 - d) provide tenancy agreements for renters for a minimum of three years with a break clause which allows the tenant to end the tenancy with a month's notice any time after the first six months and which include defined in-tenancy rent reviews that are clearly set out.

⁴⁵ The specific threshold figure for new homes that should meet Building Regulations M4(3) will be informed by the whole plan viability assessment.

⁴⁶ Rounded to the nearest whole unit.

⁴⁷ Rounded to the nearest whole unit.

⁴⁸ The need for self-build and custom housebuilding serviced plots is identified on the Surrey Heath Self-Build and Custom Housebuilding Register.



- 9) The affordable private rented dwellings must meet the requirements set out in the government’s planning guidance for build to rent homes, including a minimum discount of 20% below market values for the same or equivalent property⁴⁹. The affordable private rented housing must be provided in perpetuity⁵⁰;
- 10) All build to rent schemes should be secured in single ownership providing solely for the rental market for a minimum 20 year term with provision for clawback of affordable housing contributions should the covenant not be met.

- 3.71. The types, sizes and tenures of homes required to meet the needs of the local community have been assessed in the Housing Need Assessment 2020⁵¹. The housing mix should be informed by this evidence and the other criteria set out in Policy H5. The Housing Need Assessment indicates there is a need for the following mix of dwelling sizes and types in Surrey Heath over the period 2019-2040.

Table 7 – Indicative Mix of Housing by Size and Tenure in Surrey Heath

	1-bed	2-bed	3-bed	4+-bed
Market	5-10%	20-25%	40-45%	25-30%
Affordable Intermediate Housing	10-15%	45-50%	30-35%	5-10%
Affordable Housing (rented)	30-35%	25-35%	25-35%	5-10%

- 3.72. Where the housing need evidence for Surrey Heath is subsequently updated, this will supersede the existing Housing Needs Assessment and should instead be referred to for guiding the housing mix in Surrey Heath, in accordance with Policy H5.
- 3.73. Proposals for development should demonstrate that the proposed mix of homes will deliver a balanced mix of dwelling sizes, types and tenures to meet projected future household need within Surrey Heath.

⁴⁹ Available online at: <https://www.gov.uk/guidance/build-to-rent>.

⁵⁰ In perpetuity is at least 125 years, in accordance with the Perpetuities and Accumulations Act 2009: http://www.legislation.gov.uk/ukpga/2009/18/pdfs/ukpga_20090018_en.pdf.

⁵¹ Surrey Heath Housing Need Assessment 2020: www.surreyheath.gov.uk/sites/default/files/Surrey%20Heath%20Housing%20Needs%20Assessment%202020.pdf.



Accessible and Adaptable Homes

- 3.74. Different types of homes are required to provide accommodation that meets people's changing needs over time, enabling people to stay in their homes for longer. This includes accessible and adaptable accommodation, and homes that offer improved safety and support taking account of people's diverse needs and requirements. It is vital to plan for the delivery of such homes, as the Housing Need Assessment 2020 indicates that by 2040, the number of people over the age of 65 in Surrey Heath will increase by 52% and there will also be significant increases in the number of people with disabilities.
- 3.75. In October 2015, part M (Volume 1) of the Building Regulations was introduced, which relates to the access and use of dwellings. The regulations include a mandatory requirement M4(1) Category 1 which sets out minimum access standards (visitable dwellings). In addition, there are optional requirements for higher access standards: M4(2) Category 2 for accessible and adaptable dwellings and M4(3) Category 3 for wheelchair user dwellings. Within Category 3, there is a differentiation between wheelchair adaptable dwellings (M4(3)(2)(a)) and wheelchair accessible dwellings (M4(3)(2)(b)).
- 3.76. The national Planning Practice Guidance (PPG) requires planning policies to make use of the optional technical housing standards to help bring forward an adequate supply of accessible housing, where identified need exists⁵². The Housing Need Assessment 2020⁵³ identifies a need for all residential development to meet Building Regulations M4(2) standard and around 5%-10% of homes to meet M4(3) standard, which this policy applies to the M4(3)(2)(a) standard specifically. The PPG states that local plan policies for wheelchair accessible homes (M4(3)(2)(b)) should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling⁵⁴. Therefore, it will be determined on a case by case basis, with reference to the housing register, whether any of the affordable homes meeting M4(3)(2)(a) should be built to a wheelchair accessible dwellings standard (M4(3)(2)(b)).

⁵² Paragraph: 009. Reference ID: 63-009-20190626

⁵³ Surrey Heath Housing Need Assessment 2020:
<https://www.surreyheath.gov.uk/sites/default/files/Surrey%20Heath%20Housing%20Needs%20Assessment%202020.pdf>.

⁵⁴ Paragraph: 009. Reference ID: 56-009-20150327.



- 3.77. Policy H5 sets accessible and adaptable standard requirements to ensure a sufficient choice of accommodation is available in the market for people with particular needs. Meeting Building Regulations requirements M4(2) and M4(3) will normally be controlled through the use of a planning condition. As required by the PPG, site specific circumstances will also be taken into consideration where applying the accessible and adaptable homes requirement of Policy H5. The Council will consider the costs of delivering these homes through our viability evidence testing.

Self-Build and Custom Housebuilding

- 3.78. As required by the Self-Build and Custom Housebuilding Act 2015 (or subsequently amended legislation) the Council maintains a register of individuals or interested associations that are seeking a plot of land to construct a self-build or custom build house as a sole or main residence.
- 3.79. To help deliver a wide choice of accommodation, the provision of 5%⁵⁵ self-build or custom housebuilding plots will be sought on proposals for 20 or more net new dwellings, as a proportion of the total number of net new dwellings on site.
- 3.80. Where an applicant considers that it is not feasible or viable to meet the requirement for self-build or custom housebuilding plots, the Council will expect this to be demonstrated with robust evidence and may negotiate a proportion which is achievable. The Council will negotiate the mix of self and custom build plots to be made available as informed by the Council's Self Build and Custom Housebuilding Register. Where a plot has been made available and marketed appropriately for at least 12 months but has not sold, the plot may either remain on the open market for self or custom build or be offered to the Council or a Registered Provider before being built out by the developer for market housing.
- 3.81. Applications for self-build and custom-build developments should demonstrate high-quality design and be sensitive to the characteristics of the local area. On sites where more than one self-build or custom-build dwelling is proposed, a design framework should be submitted as part of the planning application.

⁵⁵ Rounded to the nearest whole unit.



Build to Rent Homes

- 3.82. Build to rent homes comprise purpose built housing that is typically 100% rented out including housing available for private rent and housing for affordable private rent, as defined in the planning guidance for build to rent homes⁵⁶. The private rented sector housing provided through build to rent schemes meets the housing needs of residents who cannot afford to buy or do not want to buy private homes. Private rented sector housing also meets the needs of residents who cannot get access or whose preference is not to live in other types of affordable housing or subsidised housing in Surrey Heath.
- 3.83. Build to rent scheme operators will be required to offer tenancies of a minimum of three years to all tenants in the development who are eligible to live in the United Kingdom for that period. A planning condition for the minimum tenancy period will be put in place where planning permission is granted for a build to rent development. This will apply to all tenants including those paying market rent or affordable private rent.
- 3.84. Affordable Private Rent Housing delivered as part of build to rent schemes will need to be set at a level that is at least 20% less than the private market rent (inclusive of service charges) for the same or equivalent property. Build to rent developers should assess the market rent using the definition of the International Valuations Standard Committee as adopted by the Royal Institute of Chartered Surveyors.
- 3.85. It is necessary that build to rent schemes provide rental accommodation for a minimum period of time, to help ensure that the need for private rental housing in Surrey Heath can be met during the plan period. Accordingly, the Council will require planning applications for build to rent housing to agree to a covenant that ties the development to providing solely private rented accommodation for a minimum period of 20 years. This does not apply to the affordable private rent housing which is to be provided in perpetuity.
- 3.86. A charge towards the provision of additional affordable private rented housing will be triggered where any private rented homes are sold at the development within 20 years of occupation of the completed development. This will be included as a clawback mechanism in the form of a Section 106 agreement as part of any planning permission granted for build to rent housing.

⁵⁶ Available online at: <https://www.gov.uk/guidance/build-to-rent>.



Policy H6: Specialist Housing

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

POLICY H6: Specialist Housing

- 1) Proposals for the development of specialist housing including suitable supported or extra care housing and registered bed spaces in residential care homes will be permitted, provided they:
 - a) meet the identified needs of older people and households with specific needs that are evident at the time of the proposal;
 - b) are supported by the appropriate authorities responsible for primary health care provision⁵⁷, taking account of the increased demands associated with the proposal's occupiers;
 - c) will be suitable for the intended occupiers having regard to the quality and type of facilities, the level of independence and the provision of support and/or care;
 - d) will be accessible to local shops, services, public transport and community facilities, where appropriate to the needs of the intended occupiers;
 - e) will not result in the over-concentration of specialist housing in a particular locality, leading to a material change in character; and,
 - f) will not have a detrimental impact to the vitality and viability of town centres, where residential care and nursing homes (use class C2) are located in or adjacent to designated centres; and
 - g) where appropriate delivers affordable housing in accordance with the requirements of Policy H7: Affordable Housing.

⁵⁷ Currently, Surrey County Council as the Adult and Social Care Commissioner, and the Surrey Heath Clinical Commissioning Group (CCG) and Surrey Heartlands CCG as the local commissioners of health and care services.



- 2) The mix of tenures negotiated by the Council will have regard to advice from the appropriate authorities responsible for primary health care provision, as necessary.
- 3) Proposals that would involve a net loss of specialist housing units or bed spaces, will only be permitted where appropriate replacement specialist accommodation will be provided that satisfies the criteria (1) of this policy, or it is demonstrated, using local evidence⁵⁸, that there is no local need for the existing type specialist housing to be retained.
- 4) Where permission is granted for specialist accommodation, the Council reserves the right to use a legal agreement to ensure that proposals are retained for the purpose they were intended.

3.89. National planning policy and guidance requires planning authorities to plan for a mix of housing based on current and future demographic trends and the needs of different groups in the community, including older people and people with disabilities. Whilst many older people and disabled people will want to remain in their existing homes, for some it will be necessary to move to specialist housing such as supported sheltered housing, or extra care housing. Furthermore, some people are unable to live independently and therefore require a more specialised level of care provided by a residential care home or nursing home.

3.90. Specialist housing includes the following types of accommodation:

1. age-restricted general market housing (retirement housing);
2. sheltered housing (housing with support); and
3. enhanced sheltered housing (housing with care).

3.91. Extra care housing is a specialist type of housing with care primarily for older people where occupants have specific tenure rights to occupy self-contained dwellings with agreements covering the provision of care, support, domestic, social, community or other services they receive. This type of specialist housing can be deemed either Use Class C2 or C3, dependant on various factors. Factors that will be considered in the determination of the use class classification for extra care developments include the level of facilities proposed at the site, the availability and planning of care and support as a fundamental element of the scheme, the structure of leasehold and rental arrangements for the facilities, and the structure of care provision.

⁵⁸ Surrey Heath Housing Need Assessment 2020 or any subsequent update to the housing need evidence base:

www.surreyheath.gov.uk/sites/default/files/Surrey%20Heath%20Housing%20Needs%20Assessment%202020.pdf.



- 3.92. Residential and nursing care homes provide the highest level of care of all specialist housing types considered in this policy. They are regulated as institutions by the Care Quality Commission. The provision of bed spaces in residential care and nursing homes fall within Use Class C2.
- 3.93. This policy sets a requirement that proposals for specialist housing should meet an identified need which is based on the most up-to-date available evidence. The Housing Need Assessment 2020 includes an assessment of need for specialist accommodation in Surrey Heath. The evidence in this study projects the need for housing with care or support as 1,284 dwellings over the period 2019-2040, of which 986 is for retirement housing, sheltered housing with support, or enhanced sheltered housing with care, and 298 is for extra-care
- 3.94. The Housing Need Assessment indicated a surplus of registered care bed spaces in Surrey Heath over the period 2019-2040. This is evidenced by Care Quality Commission data as set out in the Housing Need Assessment 2020⁵⁹. Registered care bed spaces are generally delivered in care homes or nursing homes, which fall within a C2 use class. Regard should also be had to the specific needs identified by the appropriate authorities responsible for primary healthcare provision in the Borough⁶⁰ upon the submission of planning applications for sheltered housing, enhanced sheltered or extra care housing, and registered care bed spaces.

⁵⁹ Surrey Heath Housing Need Assessment 2020 or any subsequent update to the housing need evidence base:
www.surreyheath.gov.uk/sites/default/files/Surrey%20Heath%20Housing%20Needs%20Assessment%202020.pdf.

⁶⁰ Specific needs for accommodation with care, residential & nursing care for older people in Surrey Heath are identified in Surrey County Council's Commissioning Statement for the Borough, downloadable from: <https://www.surreycc.gov.uk/social-care-and-health/adults/information-for-professionals-partners-and-providers/adult-social-care-strategies-policies-and-performance/accommodation-with-care-and-support-commissioning-statements>.



- 3.95. Proposals for specialist housing types will need to take into account the capacity of the appropriate authorities responsible for primary health care provision to service the needs of residents within such housing and ensure compliance with the Care Act 2014⁶¹ (or as subsequently amended). It will therefore be expected that such proposals have been informed by discussions with the relevant organisations⁶² so it can be demonstrated to the Council that occupants' needs can be sustainably accommodated. The Council would also encourage applicants to obtain endorsement for the proposal from the appropriate authorities responsible for primary health care provision where care and/or support funding may be required for residents of the scheme from the point of its completion or in future years.
- 3.96. The provision of specialist housing should help build and maintain balanced and mixed communities, and assist people who move to such accommodation to remain in their local area. The concentrated delivery of residential and nursing care homes (Use Class C2) within particular areas is not considered to promote sustainable patterns of development in the Borough and should therefore be avoided. In particular, the concentration of residential care and nursing home developments in or adjacent to town centres can, where the use is self-contained and does not contribute to activity in the town centre, impact on the vitality and viability of the centre. Proposals for development that would result in such a concentration of uses will therefore be resisted.

⁶¹ The Care Act 2014: <http://www.legislation.gov.uk/ukpga/2014/23/contents/enacted>

⁶² Currently Surrey County Council as the Adult and Social Care Commissioner, and the Surrey Heath Clinical Commissioning Group (CCG) and Surrey Heartlands CCG as the local commissioners of health and care services.



Policy H7: Affordable Housing

- 3.97. Surrey Heath offers a high quality of life, and is ranked one of the least deprived areas to live in the country⁶³. Due to this and other factors that enhance the desirability of the Borough as a place to live, there is a high cost of living, with house prices that are above the national and southeast averages⁶⁴. Correspondingly, buying or renting a home on the open market is inaccessible to many local people. The provision of affordable housing is therefore vital to assist in meeting the range of housing needs within the local community, through ensuring a choice of affordable housing types is planned for over the Local Plan's lifetime.
- 3.98. Policy H7 sets out the affordable housing requirements in Surrey Heath, and the thresholds at which these requirements come into effect. Affordable housing should meet the standards required in this policy and Policy DH3 - Residential Space Standards. The size and type of affordable housing provided should best fit the requirements of those who are in need of affordable housing provision as demonstrated in the Housing Need Assessment, or any subsequent update to the housing need evidence base, together with the National Policy requirement for First Homes.⁶⁵

⁶³ Office for National Statistics - English indices of deprivation 2019:

<https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

⁶⁴ Office for National Statistics - Median price paid for residential property:

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/medianhousepriceforanationalandsubnationalgeographiesquarterlyrollingyearhpssadataset09>

⁶⁵ First Homes Policy came into effect on 28th June 2021 as set out in a Written Ministerial Statement dated 24th May 2021: <https://questions-statements.parliament.uk/written-statements/detail/2021-05-24/hlws48>.



POLICY H7: Affordable Housing

- 1) Residential development on all sites of 10 or more residential dwellings, or a site area of 0.5ha and above, will be permitted that deliver 40% affordable housing. Where a development site meets this threshold affordable housing shall be delivered in accordance with the following criteria:
 - a) 25% of affordable housing will be provided as First Homes;
 - b) Having accounted for First Homes, the mix of tenures for the remaining affordable housing must, to the Council's satisfaction, reflect local needs identified in the Housing Need Assessment (2020)⁶⁶ or any subsequent update, and must be affordable having regard to local incomes and house rents and/or prices;
 - c) In cases where the percentage calculation provides a part dwelling, a financial contribution will be sought equivalent to that part of the residential dwelling;
 - d) The mix of dwelling sizes must reflect the Council's housing needs evidence as set out in the Housing Need Assessment (2020)⁶⁷ or any subsequent update, and have regard to the size, characteristics and location of the site;
 - e) On-site affordable housing must be well integrated within the proposed development and should be indistinguishable in appearance from market housing on site.
- 2) Where land has been subdivided into smaller development parcels that cumulatively meet the thresholds in criterion (1) of this policy, the Council will consider the site as a whole and will therefore seek 40% affordable housing on each parcel.
- 3) Viability will only be considered a constraint in exceptional circumstances and where there are significant additional costs not anticipated through the Local Plan process. In order to demonstrate viability constraints to the Council's satisfaction proposals must be supported by an independent viability assessment on terms agreed by the local planning authority and funded by the developer/applicant. If less than 40% is justified to the Council's satisfaction, the Council may include a review clause in a S106 agreement.

⁶⁶ At the time of this Plan's publication, the Council's most recent evidence base for housing need is set out in the Surrey Heath Housing Need Assessment 2020: [Local Housing Needs Assessment](#).

⁶⁷ At the time of this Plan's publication, the Council's most recent evidence base for housing need is set out in the Surrey Heath Housing Need Assessment 2020: www.surreyheath.gov.uk/sites/default/files/Surrey_Heath_Housing_Needs_Assessment_2020.pdf.



4) Affordable housing must be provided on site, unless exceptional circumstances can be demonstrated, to the Council’s satisfaction, that on site provision and management would be impractical due to size or location of the development. In such instances, agreement must be obtained from the Council for the affordable housing to be provided either off-site or through a commuted sum, taking account of site specific circumstances.

3.99. Affordable housing is defined in Annex 2 of the NPPF as (headline summary) - “housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers)...”

3.100. Table 8 (below) shows the types of affordable housing that are categorised in this Plan as Subsidised Rented Affordable Housing, and Affordable Intermediate Housing. The affordable housing categories are also defined in the Local Plan Glossary at Appendix I.

Table 8 – Categories of Affordable Housing

Category of Affordable Housing	Types of Affordable Housing
Subsidised Rented Affordable Housing	<ul style="list-style-type: none"> • Social rented housing • Affordable rented housing
Affordable Intermediate Housing	<ul style="list-style-type: none"> • Discounted market sales housing (including First Homes) • Other affordable routes to homeownership such as: <ul style="list-style-type: none"> ○ shared ownership housing ○ relevant equity loans ○ other low cost homes for sale (at a price equivalent to at least 20% below local market value) ○ rent to buy (which includes a period of intermediate rent). ○ Or any subsequently updated affordable homeownership housing types within the definition of affordable housing in Annex 2 of the NPPF

3.101. A minimum of 25% of all affordable housing units must be First Homes. First Homes are a specific kind of discounted market sale housing available for first time buyers which must be discounted by a minimum of 30% against the market value. The discount is to be retained in perpetuity through a restriction registered on the title at HM Land Registry and the first sale of the property must be at a price no higher than £250,000 once the discount has been applied.



- 3.102. In order to purchase a First Home, buyers must meet the following eligibility criteria in addition to any local connection criteria adopted by the Council:
 1. All purchasers must be first time buyers as defined in paragraph 6 of Schedule 6ZA of the Finance Act 2003 for the purpose of Stamp Duty Relief.
 2. Purchasers must have a combined annual household income of no more than £80,000.
 3. Purchasers should have a mortgage or home purchase plan to fund a minimum of 50% of the discounted price.

- 3.103. The Council's Housing Need Assessment 2020 reviewed affordable housing needs in Surrey Heath. The study indicated that the need in the Borough is greatest for Subsidised Rented Affordable Housing. Once a minimum of 25% of First Homes has been accounted for, the remaining 75% of the affordable housing component of qualifying proposals shall have regard to the findings of the Housing Need Assessment 2020 and priority must be given to the delivery of Social Rent. In accordance with the latest Housing Need Assessment, the tenure split for the remaining affordable housing component of qualifying proposals must be:
 1. At least 75% Subsidised Rented Affordable Housing comprising:
 - a) 75% Social Rent
 - a) 25% Affordable Rent
 2. 25% Affordable Intermediate Housing

- 3.104. Proposals must have regard to the most recent evidence for tenure split, where the housing need evidence base is subsequently updated.

- 3.105. Subsidised Rented Affordable Housing can be provided at different levels of rent so long as they are no higher than 80% of the local market rates. Currently, rented affordable housing is split into two sub-categories: social rented and affordable rented housing. The Council will determine the tenure mix and type of subsidised rented affordable housing required based on local needs and incomes but will prioritise the delivery of social rent in line with national guidance. To inform this, the Council will have regard to the most recent housing need evidence and data collected for administration of the local authority's housing allocations. The Subsidised Rented Affordable Housing should be used solely for that purpose and remain at an affordable price for future eligible households, or the subsidy should be recycled for alternative affordable housing provision. Affordable housing or financial contributions will be secured through Section 106 agreements.



- 3.106. The Council's evidence base for housing should also be referred to as a guide for the range and split of housing types required within the Affordable Intermediate category, including First Homes. As with the Subsidised Rented Affordable Housing category, the tenure mix and type of Affordable Intermediate Housing required will be determined based on local needs and incomes, having regard to housing need evidence and the local authority's housing allocations data. The Housing Need Assessment 2020 provides evidence of the need for those who can afford to rent in Surrey Heath, but cannot afford to buy. Once a minimum of 25% of First Homes has been accounted for, this evidence suggests that shared ownership housing would meet the greatest need for Affordable Intermediate housing in Surrey Heath, due to the lower deposit requirements and lower overall costs. In addition, lower equity shares for shared ownership housing would help to make this type of housing more affordable.
- 3.107. Affordable homes must be integrated within proposed developments to help build and maintain balanced and mixed communities in Surrey Heath. However, the feasibility of managing and maintaining the affordable homes will also be given consideration when assessing the acceptability of their siting and distribution.
- 3.108. It is strongly recommended that applicants and developers use the Council's Pre-application Service as an opportunity to work with the Council to understand the affordable housing needs in Surrey Heath in greater detail. This will be informed by the National Policy requirement for First Homes and the Housing Need Assessment⁶⁸ and supplemented by data from the local authority's Housing Register and information provided to the Council from registered social housing providers operating in the area. The additional evidence obtained through this exercise should be used to help inform the mix of affordable housing sizes and tenures in the proposal, reflecting up-to-date needs in the Borough.
- 3.109. Proposals that are above the thresholds for affordable housing provision in this policy are required to submit an Affordable Housing Statement, as set out in the Council's Local Validation List⁶⁹. In addition to the requirements outlined in the Local Validation List, the Affordable Housing Statement should also demonstrate:
- I. How pre-application discussions have informed the mix of affordable housing sizes and tenures in the proposal;

⁶⁸ Surrey Heath Housing Need Assessment 2020: www.surreyheath.gov.uk/sites/default/files/Surrey_Heath_Housing_Needs_Assessment_2020.pdf, or any subsequent update.

⁶⁹ Surrey Heath Local Validation List: www.surreyheath.gov.uk/sites/default/files/documents/residents/planning/advice-services/ValidationDocJuly14FinalV2.pdf.



2. How the tenures of the proposed affordable housing will comply with the National Policy requirement for First Homes and meet local housing need in Surrey Heath, with reference to local incomes and house rents/prices.
- 3.110. A percentage figure for affordable housing of 40% is included in the policy but will be subject to review following completion of the whole Local Plan Viability Study.
- 3.111. Where a developer considers that meeting the affordable housing target percentages or apportionments in this policy will be unviable, robust evidence demonstrating why it is unviable must be provided in the form of an independent viability appraisal. The evidence will be published on the Council's website, to ensure transparency. Where developers raise viability concerns with providing the required percentages or apportionments of affordable housing, they will be expected to meet the costs of any financial appraisals commissioned by the Council, as well as their own. The Council may include a review mechanism in planning obligations to ensure that viability on site can be reviewed over time. Regard should also be had to the advice on viability set out in the supporting text to Policy IN1 Infrastructure.
- 3.112. In cases where viability concerns are raised, it will be necessary for negotiations between the Council and the developer to take place to understand what has impacted the development's reduced viability or non-viability. As part of this process, the developer may be required to provide an independently commissioned assessment which applies the government's Development Appraisal Tool⁷⁰ or other equivalent tools agreed with the Council in advance of the assessment.
- 3.113. In exceptional circumstances where it can be satisfactorily and robustly demonstrated that the level of affordable housing being sought would be unviable, alternative tenure mixes and levels of affordable housing provision may be considered. In the first instance this should seek to provide 25% First Homes and retain the same number of homes in the Subsidised Rented Affordable Housing category, with priority given to social rent, and vary the type or reduce the number of homes in the Affordable Intermediate housing category. This is because current evidence indicates that the greatest local need is for Subsidised Rented Affordable Housing.

⁷⁰ Development Appraisal Tool: <https://www.gov.uk/government/collections/development-appraisal-tool>.



- 3.114. The Council will not accept the subdivision of sites into smaller development parcels that it considers are being partitioned in order to circumvent the affordable housing requirements of this policy, or any other policy requirements within this Plan. In determining whether two or more pieces of land in close proximity to each other should be considered as one site, the Council will have regard to relevant information about the land, including:
1. The sites' present and historic land ownership;
 2. The planning history of the land; and
 3. Whether there is a reasonable prospect of developing both sites together.
- 3.115. This Policy will also apply to specialist housing where the site is delivering a net gain of 10 or more self-contained units (In Use Class C3 or C2). Self-contained units are defined as 'where all the rooms (including kitchen, bathroom and toilet) in a households accommodation are behind a single door which only that household can use.'⁷¹ Developments that consist of single bedroom units such as traditional care or nursing homes, will not be required to contribute towards affordable housing.

⁷¹ MHCLG English Housing Survey Glossary: <https://www.gov.uk/guidance/housing-statistics-and-england-housing-survey-glossary/a-to-z>.



Policy H8: Loss of Housing

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

Policy H8: Loss of Housing

- 1) Proposals for the redevelopment, conversion or change of use of land or buildings involving the net loss of residential units will not be permitted unless one of the following circumstances apply:
 - a) The proposal would enable units of sub-standard size to be enlarged or replaced with alternative residential provision within the same use class, in order to meet residential space standards; or,
 - b) The proposal would enable existing affordable homes to be adapted to address an identified shortfall in larger affordable dwelling sizes; or,
 - c) The proposal would ensure that a building of historic importance can be retained or renovated; or,
 - d) The proposal would provide a non-commercial social, community or cultural service or facility where both of the following criteria apply:
 - i. The applicant can demonstrate a local need; and,
 - ii. It has been demonstrated that the service or facility cannot be provided elsewhere.
- 2) Development proposals that would result in the loss of part of an existing unit of residential accommodation will only be permitted where any retained residential accommodation would be of a satisfactory standard in terms of amenity and internal space.
- 3) Where evidenced by local needs the Council will support the retention of housing designed to meet the needs of the Borough's older population and people with disabilities, such as single storey homes.



- 3.118. The National Planning Policy Framework requires local planning authorities to boost significantly the supply of housing. By implication, the loss of an existing housing stock would be at odds with this objective of the National Planning Policy Framework.
- 3.119. Within Surrey Heath, a number of significant policy and environmental designations limit the amount of land available for residential development, including the Thames Basin Heaths Special Protection Area which covers 23% of the Borough and prohibits residential development within a 400m buffer zone around its perimeter. As a result of this, and other policy designations, including the Metropolitan Green Belt, the housing targets for the Borough are challenging to achieve. Any loss of existing units would exacerbate these difficulties and will inhibit the Borough's ability to significantly boost the supply of housing. As a result, it is important to ensure that the existing stock of homes is protected.
- 3.120. Notwithstanding this, there may be some cases where the harm arising from the loss of a dwelling may be outweighed by other factors, as set out in this Policy. In cases where a net loss of residential development is proposed, the applicant will be required to provide robust and appropriate evidence to justify the exception; depending on the circumstances of the case, this may be provided within an Affordable Housing Statement, Planning Statement or Heritage Statement as appropriate.
- 3.121. Certain types of housing can contribute toward meeting the needs of the Borough's older population and people with disabilities, such as single storey homes. The Council recognises the role of such single storey accommodation in contributing to meeting the accommodation needs of older persons and welcomes its retention where this would help address local housing needs indicated in the Housing Need Assessment⁷² and is consistent with other local plan policies.

⁷² The Housing Need Assessment 2020 cites a shortage of single-storey accommodation. This is identified from engagement with local agents. Available online at: [www.surreyheath.gov.uk/sites/default/files/Surrey Heath Housing Needs Assessment 2020.pdf](http://www.surreyheath.gov.uk/sites/default/files/Surrey_Heath_Housing_Needs_Assessment_2020.pdf).



Policy H9: Rural Exception Sites

- 3.122. In rural areas of the Borough, high house prices and a limited supply of new affordable homes restrict the potential for residents and those working in the area to live in a home that they can afford. People who cannot afford to access market housing that meets their needs, either to rent or to buy, need affordable homes. The development of rural exceptions sites can help to meet a range of local affordable housing needs in rural areas, by allowing for genuinely affordable housing schemes that meet evidenced local needs, on suitable sites outside the defined settlement boundaries.

Policy H9: Rural Exception Sites

- 1) Small scale developments of affordable housing which are outside defined rural settlement boundaries will only be permitted where they meet all of the following criteria:
 - a) the number, size and tenure of homes has been demonstrated to meet, or contribute to meeting, the evidenced affordable housing needs of the local area;
 - b) it has been demonstrated that the need cannot be met within a settlement boundary;
 - c) the site adjoins a rural settlement; and can be demonstrated to be in a sustainable location;
 - d) the affordable homes are secured in perpetuity;
 - e) that the housing will be for those with a local connection in the first instance and this will be ensured through legal agreement; and
 - f) the development is in keeping with the character and size of the settlement.
- 2) The minimum number of market dwellings within a rural exception site will only be permitted in exceptional circumstances where the following is evidenced:
 - a) the scheme would be unviable without the inclusion of market housing;
 - b) it would not inflate the threshold land value⁷³; and
 - c) the development physically integrates open market and affordable housing.

⁷³ This is the minimum land value likely to trigger an owner to sell the land.



- 3.123. There are fewer opportunities to provide housing developments at a scale which will deliver significant levels of affordable units within the Borough's smaller rural settlements. Some of these areas are partly and fully surrounded by, or designated as Green Belt, where new residential development is often restricted, and countryside beyond the Green Belt. As such, this Policy seeks to enable the provision of genuinely affordable-led developments in locations adjacent to rural settlements within the Borough, incorporating:
- Bagshot;
 - Bisley;
 - Chobham;
 - Deepcut;
 - Lightwater;
 - West End; and
 - Windlesham.
- 3.124. Affordable housing in rural settlements can help to provide accommodation for local people, who often have a local connection through employment, or from growing up in the area and still having family who reside in the locality.
- 3.125. A rural exception site is an exception to normal planning policy, therefore, the applicant must justify their proposals to the Council and community, by being fully compliant with this Policy.
- 3.126. The appropriate size of a rural exception site will be considered on a case-by-case basis, taking into account the scale of the proposed development in relation to the settlement and site specific considerations, including the sustainability of the location, and the level of evidenced local need.
- 3.127. In assessing proposals for rural exception sites, the applicant must robustly demonstrate that there is a genuine local need for affordable housing of the number, size and tenure of homes proposed from people who are or have been closely connected with the rural settlement through family, recent past residence, or current employment. Needs should be established through a robust, and up to date, Local Housing Needs Assessment. Only surveys carried out using a methodology agreed by both the relevant Parish Council and the Borough Council will be considered suitable.
- 3.128. The applicant must demonstrate that there are no sequentially preferable sites within the associated settlement area that have been, or would be, capable of meeting local affordable housing needs. At a minimum, this should examine past delivery of affordable housing and available sites as identified within the SLAA.



- 3.129. The Council will not support unsustainable patterns of development. Rural exception sites that are disconnected from settlements are likely to lead to an increased dependence on private motor vehicles and the creation of isolated communities that would not benefit from the services needed on a day to day basis. In this respect, the Council considers that rural exception sites should be adjacent to an existing settlement.
- 3.130. In order for a rural exception scheme to be granted planning approval the housing provider will have to demonstrate that mechanisms are in place to ensure that the properties remain as affordable housing in perpetuity. For example, being held in a Community Land Trust and let on terms, which would not allow the freehold to be acquired by the resident, and/or sold on the open market. To ensure that affordable housing provided through rural exception sites remains affordable for those with a local connection to the parish in perpetuity, the development and occupancy of each rural exception site will be controlled through a legal agreement.
- 3.131. It is essential that rural exception sites are clearly and demonstrably affordable housing led. However, in line with the National Planning Policy Framework, the Council recognise that in exceptional circumstances market housing may be required to make a proposal viable, in such instances the site must be delivered with an appropriate mix and integration of affordable and open market tenures.
- 3.132. In cases where viability concerns are raised, it will be necessary for negotiations between the Council and the applicant to take place to understand what has impacted the development's reduced viability or non-viability. Where market housing is proposed, the Council will require submission of an open book development viability appraisal. The evidence will be published on the Council's website, to ensure transparency. External consultants will be appointed at the applicants' cost to provide an independent assessment of the scheme's viability. As part of this process, the applicant will be required to apply the government's Development Appraisal Tool⁷⁴ or other equivalent tools agreed with the Council in advance of the assessment.
- 3.133. If the exceptional circumstances for the inclusion of market housing on a site can be satisfactorily and robustly demonstrated, and the level of affordable housing being sought would be unviable, alternative tenure mixes and levels of affordable housing provision may be considered. In the first instance, this should seek to retain the same number of homes in the Subsidised Rented Affordable Housing category, and vary the type or reduce the number of homes in the Affordable Intermediate housing category.

⁷⁴ Development Appraisal Tool: <https://www.gov.uk/government/collections/development-appraisal-tool>.



Policy H10: First Homes Exception Sites

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

Policy H10 – First Homes Exception Sites

- 1) Proposals for First Homes which are outside defined settlement boundaries and lie within the Countryside beyond the Green Belt will be permitted where they meet all of the following criteria:
 - a) the site adjoins a defined settlement boundary and can be demonstrated to be in a sustainable location;
 - b) the First Homes are secured in perpetuity;
 - c) the need for First Homes is not being met within the Borough;
 - d) the development is small scale and proportionate to the character and size of the settlement; and
 - e) the development will not lead to visual or physical coalescence of settlements.
- 2) Market dwellings within a First Homes exception site will only be permitted in exceptional circumstances where the following is evidenced:
 - a) the requirements set out in a - e are satisfactorily met;
 - b) the scheme would be unviable without the inclusion of market housing;
 - c) it would not inflate the threshold land value⁷⁵;
 - d) the amount of market housing is only that required for viability purposes; and
 - e) the development physically integrates open market and affordable housing.
- 3) The provision of other forms of affordable housing as part of the affordable housing mix will be permitted where local evidence demonstrates a significant local need.

⁷⁵ This is the minimum land value likely to trigger an owner to sell the land.



Reasoned Justification

- 3.135. First Homes provide a discounted market form of affordable housing as set out in more detail in relation to Policy H7. National Planning Practice Guidance sets out that First Homes may be acceptable on 'exception' sites. These are sites not allocated within the Local Plan, that are adjacent to a settlement and which are of a small scale proportionate to the size of the settlement. First Homes exception sites cannot come forward in areas designated as Green Belt or designated rural areas as defined in Annex 2 of the NPPF. In these areas Rural Exception Sites are the sole permissible type of exception site wherein development proposals must accord with Policy H9 on Rural Exception Sites.
- 3.136. First Homes Exception sites are therefore limited to sites adjacent to the settlement boundary in the Countryside beyond the Green Belt. In Surrey Heath such sites will be limited due to the presence of the Thames Basin Heaths SPA and the 400m buffer and other constraints.
- 3.137. As set out in relation to Policy H7: Affordable Housing, First Homes will be secured in perpetuity through a legal agreement and land registry title on the property. They will be available to those that meet the First Homes eligibility requirements and meet any First Homes local connection criteria adopted by the Council.
- 3.138. The Council will not support unsustainable patterns of development. Exception sites that are disconnected from settlements are likely to lead to an increased dependence on private motor vehicles and the creation of isolated communities that would not benefit from the services needed on a day to day basis. The Council therefore expects Exception sites to be physically adjacent to an existing settlement.
- 3.139. Where development proposals come forward for First Homes Exception sites applicants will be expected to demonstrate that the site is of a proportionate scale. The Council will take matters including the scale of the existing settlement and the impact on coalescence and separate identity of settlements into account in any such assessment. It is considered that the previous national guidance on a proportionate size for Entry Level Exception sites is appropriate as a guide. This set out that Exception sites should not be more than 1 hectare in size or exceed a maximum of 5% of the size of the existing settlement. Applicants should set out how their proposal is of a proportionate scale having regard to these issues.
- 3.140. In line with national Planning Practice Guidance, the Council recognises that in exceptional circumstances market housing may be required to make a proposal viable. In such instances the site must be delivered with an appropriate mix and integration of affordable and open market tenures.



- 3.141. In cases where viability concerns are raised, it will be necessary for negotiations between the Council and the applicant to take place to understand what has impacted the development's reduced viability or non-viability. Where market housing is proposed, the Council will require submission of an open book development viability appraisal to ensure that only the amount of market housing required to enable the development to come forward is provided. The evidence will be published on the Council's website, to ensure transparency. External consultants will be appointed at the applicants' cost to provide an independent assessment of the scheme's viability. As part of this process, the applicant will be required to apply the government's Development Appraisal Tool⁷⁶ or other equivalent tools agreed with the Council in advance of the assessment.
- 3.142. The Council would support other forms of affordable housing being provided alongside First Homes. However, in line with Government guidance such proposals would need to be robustly supported by evidence of local need. This evidence should be consistent with that provided for Rural Exception sites as set out under Policy H9. Government guidance also makes clear that First Homes Exception sites will also only be permissible where the need for such homes is not being met within the Borough. Whilst it is considered unlikely that this would be the case, should the Housing Needs Assessment and ongoing monitoring demonstrate to the Council that the housing need for first time buyers is being met then First Homes Exception sites will not be justified.

⁷⁶ Development Appraisal Tool: <https://www.gov.uk/government/collections/development-appraisal-tool>.



Policy H11: Gypsies and Travellers and Travelling Showpeople

- 3.143. The Council has a responsibility through the NPPF, and legal requirements, to assess and plan for the housing needs of all residents, including the Gypsy and Traveller community. The national Planning Policy for Traveller Sites (PPTS) (2015) directs the process that must be followed in order to effectively assess and plan for this specific housing requirement.
- 3.144. The Government's overall aim, as set out in the PPTS, is "to ensure fair and equal treatment for Travellers, in a way that facilitates the traditional and nomadic way of life of Travellers while respecting the interests of the settled community".
- 3.145. The PPTS is an important document as it also amends the previous definition of who is considered to be a 'Gypsy or Traveller' for the purposes of planning. The PPTS redefined those who qualify as 'Travellers' as follows: "Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such".
- 3.146. This definition change did not remove the obligation of the Council to accommodate others who reside in caravans, however, this obligation sits outside planning functions. However, permissions for Gypsy and Traveller sites will be subject to conditions limiting their occupation to those who meet the definition of Gypsies and Travellers as defined in planning policy.
- 3.147. In accordance with Government guidance, the Council is required to identify a supply of specific, deliverable Gypsy, Traveller and Travelling Showpeople sites sufficient to provide five years' worth of sites against our locally set targets to meet accommodation needs of these groups who meet the revised definition within Surrey Heath.
- 3.148. This policy, along with Policy H12: Gypsy and Traveller allocations, aims to meet the Borough's local need and ensure that sites are sustainable economically, socially and environmentally.



Policy H11: Gypsies, Travellers and Travelling Showpeople

Safeguarding Existing Supply

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

Planning Applications

- 2) Planning permission for the expansion to existing sites or new sites to accommodate Gypsy and Traveller and Travelling showpeople accommodation, will only be permitted outside of allocated sites if the following criteria are met for the site:
 - a) Safe pedestrian, cycle and vehicular access on to the highways network can be provided, taking into account the type of vehicles that could reasonably be expected to use or access the site;
 - b) Is capable of being provided with essential utilities, including mains water, electricity, sewerage, drainage and waste disposal, in addition to appropriate amenity space. In the case of plots for Travelling Showpeople, adequate storage space must also be provided;
 - c) Accords with the criteria set out in Policy E5: Flood Risk and Sustainable Drainage;
 - d) Local services and facilities – such as shops, public transport, schools, can be readily accessed;
 - e) Does not pose a significant risk to the health and safety of the site's residents;
 - f) Would not give rise to an unacceptable adverse impact on the amenity of adjoining properties and land uses or the character of the surrounding area. Appropriate boundary treatment and landscaping must be capable of being provided;
 - g) Sites are located, and can be managed, so as not to result in any significant conflict with existing land uses;
 - h) Provides adequate space for vehicle parking, turning and servicing of large vehicles, storage, play and residential amenity; and
 - i) Arrangements are put in place to ensure the proper management of the site to seek to ensure community cohesion between the settled and traveller communities.



- 3) Any permission granted for a Gypsy and Traveller and Travelling Showpeople site will be subject to a condition limiting occupation to Gypsies and Travellers and Travelling Showpeople, as appropriate.

Meeting Future Needs Within Strategic development sites

- 4) To meet the needs of Gypsy and Traveller and Travelling Showpeople households whether they meet the planning definition or not, accommodation is expected to be provided on development sites of 100 homes or more whilst there remains an identified need within Surrey Heath. Developments located within a town centre, which deliver regeneration and comply with the Council's town centre strategy, will not be expected to provide provision.
- 5) The number of pitches and plots required will reflect the level of local need within Surrey Heath. However, sites will have at least 3 pitches/plots, and should contain the maximum number of pitches/plots that can be reasonably accommodated on the site.
- 6) If a development site is required to make on-site provision for traveller accommodation and has robustly demonstrated that it is unable to do so, offsite provision will be considered.
- 7) Offsite accommodation will only be considered appropriate where all of the following criteria are met:
 - a) The exceptional circumstances demonstrating on-site provision is not feasible have been proven;
 - b) The alternative site provides for at least the same quantity of provision;
 - c) The alternative site is considered as sustainable in regards to access to services, location and size as allocation on site;
 - d) The alternative site complies with the other policies of this Plan, including Green Belt policies; and
 - e) The site can be developed within the timeframe of the housing development.

3.149. In order to achieve the overarching aim of the Government guidance, the Council commissioned a Gypsy and Traveller Accommodation Assessment. The Surrey Heath Gypsy and Traveller Accommodation Assessment (GTAA) 2020 identified a need for at least 32 pitches for Gypsies and Travellers and 14 plots for Travelling Showpeople meeting the planning definition across the plan period. The GTAA also identified a need for a further 32 pitches for Gypsy and Traveller households that did not meet the planning definition.



- 3.150. It is important to protect existing Gypsy and Traveller sites from being developed for alternative uses whilst there is a need for such sites, as currently demonstrated by the GTAA. It is also important to safeguard these sites for future generations of Gypsies and Travellers. It is also important to safeguard the existing Traveling Showpeople yard at Pennypot Lane, as there is currently only one site in the Borough and the GTAA has established that there is also need for further plots.
- 3.151. Therefore, any sites with existing lawful use as a traveller site should not be lost to an alternative use, unless an alternative replacement site has been identified. Sites that are granted a personal permission, to be inhabited by a named family, will not be safeguarded under this policy. Any new traveller sites granted planning permission and implemented shall also be safeguarded under the provisions of this policy as long as the need for traveller accommodation within the Borough remains.
- 3.152. The Council has also incorporated a windfall section within the policy. The suitability of the location of any further sites for Gypsies, Travellers or Travelling Showpeople, which come forward during the plan period will be determined in accordance with the planning applications section of the policy.
- 3.153. A specific, clearly worded windfall section within the policy enables the Council to deal with planning applications for Gypsy and Traveller sites on a site-by-site basis and would allow suitable sites to continue to be permitted, provided they meet criteria set out in the policy. This section of the policy will ensure sites are well-related to existing and proposed services and facilities and which would not adversely impact on a protected landscape, that may previously not have been identified have the opportunity to come forward in the plan period.
- 3.154. This section considers the environment, access to public transport and services, access, flood risk and amenity. New pitches and plots should have adequate utility services and amenity space, safe turning space and parking and be in areas with reasonable access to schools, health services and local services. Travelling showpeople sites may also need space for related business storage. This will reduce the need for long-distance travelling and unauthorised encampment, taking into account environmental amenity and consideration of infrastructure and access to education and health care facilities for residents. In addition, development should not adversely impact on the key characteristics of Landscape Character Areas.
- 3.155. The impact of new traveller accommodation on existing communities and how well proposals can be integrated is an important consideration in the determination of applications for Gypsy and Traveller provision.



- 3.156. In granting consent for a site, the Council will include a condition to ensure that the sites remain in use by Gypsies and Travellers or Travelling Showpeople as appropriate, and the number of pitches and plots are retained to ensure a supply to need demand.
- 3.157. To aid the delivery of the pitches and plots required across the plan period, the provision of on-site pitches/plots will be sought as part of the development of strategic sites. Off-site provision will only be acceptable where it has been robustly demonstrated that on-site provision is not possible.
- 3.158. The development of the allocated sites/yards and any sites/yards delivered through strategic development will also be expected to comply with the planning application section of the policy.

Policy H12: Site Allocations for Gypsy and Travelling Showpeople Accommodation

Policy H12: Site Allocations for Gypsy and Travelling Showpeople Accommodation

1) The following site is allocated for Gypsy and Traveller accommodation:

Site Reference	Site Name / Address	Indicative Pitches
HA12/01	Diamond Ridge Woods, Camberley	4
Development Requirements	1) Development proposals are required to: <ul style="list-style-type: none"> a) retain the existing vegetation boundary along London Road as far as reasonably practicable; b) provide high quality landscaping and appropriate and usable private and communal amenity space; c) be supported by a Green Space Management Plan addressing the future management of land remaining as SANGS; d) be informed by the results of a full Noise Impact Assessment that considers the proximity to the A30 London Road, in addition to further species specific survey work; and, e) provide suitable vehicular access to, and within the site. 	



- 3.159. In advance of the publication of the Draft Local Plan the Council has undertaken a broad portfolio of work seeking to identify land to deliver the pitches and plots required to meet the needs of the Borough's Gypsy and Traveller and Travelling Showpeople communities. Despite this, the Council has so far been unable to identify sufficient sites to meet the Council's identified needs, with a remaining shortfall of 30 Gypsy and Traveller pitches and 14 Travelling Showpeople plots across the Plan period.
- 3.160. To aid the delivery of the pitches and plots required across the plan period, provision will be sought as part of the development of strategic sites through Policy H11. In addition, some of the remaining identified needs may be met through windfall sites. Windfalls are the sites that are brought forward which have not been specifically identified for development. However, in isolation these are unlikely to be sufficient to meet the shortfall in identified needs for Gypsy and Traveller Pitches and Travelling Showpeople plots.
- 3.161. The Council will continue work to identify suitable sites for allocation within the Surrey Heath Local Plan across the remainder of the Plan-making process. The detailed work undertaken to date by the Council in respect of seeking to identify land to meet the Council's needs, in addition to an overview of future work to be undertaken is set out in the Council's Gypsy and Traveller Background Paper which is published alongside the Draft Local Plan.
- 3.162. To support the work being undertaken by the Council, a focused 'Call for Sites' will be undertaken alongside the consultation on this Draft Local Plan and will invite anyone with an interest in land, potential sites and broad locations for Gypsy and Traveller or Travelling Showpeople sites to submit these to the Council for consideration for inclusion within the new Local Plan. The information provided through the 'Call for Sites' as well as an analysis of development opportunities by the Council using other sources of information will be used to inform the identification of additional sites which the Council considers are suitable for allocation within this new Local Plan. Any further proposed allocations will be subject to further consultation.
- 3.163. The information set out against each proposed allocation will not be a formal development brief. Any proposals coming forward on the sites will be assessed against all Local Plan policies and other material considerations relevant at the time of application. The Council may require the applicant to provide more information or include measures that are not specifically identified within the allocation policies.



4. Section 4: Town Centres, Retail and Economy

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

Policy CTCl: Camberley Town Centre

- 4.2. Camberley Town Centre lies in the west of the Borough along the A30 London Road and just east of the Borough's western boundary with Berkshire and Hampshire. As set out in the Spatial Strategy section Camberley is the main retail centre in the Borough providing for a mix of shopping, business, leisure, civic, cultural and community activities. The amount of residential accommodation in the town centre has increased over the last few years.
- 4.3. The boundary of the town centre is shown on Figure 7 in this Chapter and on the Policies Map.
- 4.4. The town centre includes Camberley Rail station as well as civic, community and leisure facilities on Knoll Road including Camberley Theatre. The core retail area is focused around The Square, the High Street and Park Street with the Atrium hosting a nine screen cinema and a range of leisure and restaurant facilities.
- 4.5. In 2014 the Council adopted the Camberley Town Centre Area Action Plan (AAP) to guide future development in the town centre and a Camberley Town Centre Masterplan and Public Realm Strategy Supplementary Planning Document was then adopted in 2015. The AAP will be replaced by Policies and allocations in the new Local Plan.
- 4.6. The Council has a corporate objective to deliver an improved town centre and has made significant investment in the town centre over recent years. In partnership with others, particularly Surrey County Council and the Enterprise M3 LEP this includes:
1. the acquisition and subsequent refurbishment of The Square shopping centre;
 2. the acquisition of Ashwood House, the former BHS and office building, and redevelopment into 116 high quality residential apartments;
 3. improvement works to High Street, Princess Way and Knoll Walk to create a more pedestrian-friendly high quality street environment; and
 4. Improvement works along the A30.
- 4.7. The Council is also progressing the future of the London Road Block. This is a key town centre development site that has the potential to provide a major residential led regeneration scheme. It is one of the largest available areas of brownfield land in the Borough and is centrally positioned in the Town Centre with further details on its location and future development set out in Policy HA2.



- 4.8. A Corporate Camberley Town Centre Strategy is currently being prepared and will inform future versions of this Local Plan, including a review of the Vision and links to future masterplanning.
- 4.9. Since the adoption of the AAP in 2014 there have been some significant social and economic changes that affect future town centre policies. These include:
1. A decline in the demand for retail space and in retail investment and the rise of online shopping;
 2. Increased importance of town centres for leisure and health facilities;
 3. Changes in planning legislation and guidance giving greater flexibility between land uses;
 4. Covid-19 and the short and longer term economic effects and changes to the way people work, travel and shop;
 5. Changes in digital technology;
 6. Climate change significance, commitments and technology;
 7. Recognition of the increased scope and value of residential development in town centres.
- 4.10. This version of the Local Plan has been prepared as the economy still copes with the unprecedented consequences of Covid-19 on retailers and town centres. At present the long-term impacts are not known but partly in response to the impacts of Covid-19, the Government has introduced a number of significant planning reforms including changes to the Use Classes Order. This, and other changes to permitted development rights, mean that there is much greater flexibility for changes of use in town centres without the need for planning permission.
- 4.11. The Draft Vision for Camberley Town Centre is set out in Section I of this Plan and for ease of reference repeated below. As set out above this will be reviewed as part of the Corporate Camberley Town Centre Strategy being prepared.

Camberley town centre will be thriving and digitally connected, offering a wide range of shops, excellent leisure experiences, cafés and restaurants, flexible office premises, a full range of community services and new homes meeting local needs.

Development will be of a high quality design including measures to mitigate and adapt to climate change with improved green and civic open spaces. There will be safe and easy access to and within the centre with a good public transport system and an emphasis on improved cycle and pedestrian priority.



Policy CTC1: Camberley Town Centre

- 1) Development will be permitted within the defined town centre boundary that maintains or enhances the vitality and viability of Camberley town centre and which, as appropriate to the scale and type of development:
 - a) contributes to the delivery of a healthy and vibrant, experience based town centre by ensuring it is the focus for the development of Main town centre uses⁷⁷ and provides for all sectors of the community;
 - b) protects a robust retail core in the Primary Shopping Area by supporting a concentration of retail uses in line with Policy CTC2;
 - c) is consistent with the delivery of the priority regeneration sites including London Road Block as set out in Policies HA1: Housing Allocations; HA2: London Road Block and HA3: Land East of Knoll Road;
 - d) retains and enhances existing markets and supports opportunities for the creation of new markets;
 - e) delivers a safe, healthy and accessible environment, supporting the 20 Minute Neighbourhood principles;
 - f) delivers a mix of high quality homes, including affordable homes meeting local needs, on suitable sites within the town centre, including above ground floor level and as set out in Policies HA1, HA2 and HA3.
 - g) delivers flexible employment uses appropriate in the town centre;
 - h) delivers high quality public realm improvements, maximizing opportunities to “green” the town centre environment, including Camberley Park and providing attractive places to dwell and space to accommodate outdoor events;
 - i) delivers improved accessibility and permeability for all, both within the town centre and between the town centre and the wider settlement with a focus on improved east/west connectivity and in line with Policy CTC3.
 - j) delivers good quality design, in line with existing and future national and local Design Guidance and Design Codes;

⁷⁷ Main Town Centre Uses: As defined in the NPPF - The uses that should normally be found within defined town centres, including uses within Class E, Class F1, F2 and certain sui generis uses i.e. retail development, leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices and employment uses appropriate to a town centre location; schools and colleges; places of worship; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).



- k) conserves and enhances the Victorian/Edwardian historic character and setting of the High Street, including key views;
- l) relocates the library and/or Camberley Theatre to more central locations should opportunities arise;
- m) includes provision of the most up to date digital technology; and
- n) supports actions that deliver a low carbon town centre and provide appropriate adaptation and mitigation measures in relation to climate change in accordance with Policies SS3a and b including:
 - i. provision of electric charging points;
 - ii. urban greening and shading; and
 - iii. delivery of low carbon heating.

Reasoned Justification

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

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

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



Camberley Town Centre analysis

- 4.14. In 2019 the Council commissioned Lambert Smith Hampton to prepare a Town Centre Uses and Future Directions Study (Town Centre Uses Study) to inform the Local Plan, with a focus on Camberley Town Centre. This was undertaken prior to the outbreak of the Covid-19 pandemic and the long-term impacts of this are as yet unknown. However, it is clear nationally that some trends, such as the move to online shopping which were already taking place have been accelerated by Covid. Evidence in the 2020 Town Centre Uses Study suggests that given the changing nature of retailing, there is no Borough wide capacity for new retail floorspace over the plan period for either comparison or convenience goods after taking account of existing commitments and vacant floorspace.
- 4.15. The Town Centre Uses Study found that for comparison goods the proportion of online sales across Camberley town centre (pre-covid) was slightly higher than the national average. The Study also identified that the current provision of comparison outlets as a proportion of total outlets in Camberley Town Centre (43.9%) is above the national average of 37%. Comparison goods floorspace represented 50% of total floorspace in the town centre, which is also above the national average figure of 42.6%. Although the strong provision of comparison retailing floorspace in Camberley is a positive indicator, the Study suggests that it could also represent a weakness given current trends in the retail sector and the proportion of online sales. Camberley could therefore be vulnerable to the loss of comparison goods space over time and this emphasises the need for the town centre to provide much more than a retail role to ensure that it continues as an attractive place to live and visit.
- 4.16. Despite the current challenges facing town centres, the Study suggests that Camberley still performs well and has the potential to continue to do so. It concludes:
- “It [Camberley Town Centre] has many assets, strengths and opportunities upon which to build the next phase of its recovery, regeneration and renaissance; although this will clearly need to look “beyond retail” as the answer to the challenges it is facing and will face. The Council also has a key stake in the town centre through its ownerships and partnerships, and is therefore well placed to proactively develop, manage and curate the town’s offer, and exploit new investment opportunities and funding.”*
- 4.17. The Town Centre Uses Study also recognises the value of the library and Camberley Theatre in drawing people into the town centre, especially in view of the wider role of activities that libraries now host. Should appropriate opportunities arise for these uses to be relocated into a more central town centre location then this will be strongly supported subject to compliance with other policies.



Delivery

4.18. A number of sites/areas are identified for residential led development in the town centre as set out in Policies HA1, 2 and 3 of this Plan. These sites offer scope for significant change and an increase in new homes in the town centre, particularly at London Road Block and Knoll Road. The Plan below shows the distribution of allocated and permitted sites for residential/mixed use in the town centre.

Figure 7 – Camberley Town Centre Sites



4.19. Development of the London Road block is being led by the Council and offers the potential to provide an improved ‘gateway’ into the town centre as well as a mix of uses including residential and public open space. Land at Camberley Station, Pembroke Broadway is also allocated for residential development and provision of an improved rail station, providing the opportunity for an improved visitor experience and improved links with the rest of the town centre.



- 4.20. Camberley is a relatively compact centre, close to residential areas within Camberley itself as well as the new Places Leisure Camberley Centre. The main attribute that people who were interviewed as part of the Town Centre Uses Study ‘liked’ about the town centre was that it was compact. The Council supports the principles behind the 20 Minute Neighbourhood⁷⁸ – this can be summarised as ‘a complete, compact and connected neighbourhood, where people can meet their everyday needs within a short walk or cycle’. This includes characteristics such as:
1. diverse and affordable homes;
 2. well connected paths, streets and spaces;
 3. schools at the heart of communities;
 4. good green spaces in the right places;
 5. local food production;
 6. keeping jobs and money local;
 7. community health and wellbeing facilities; and
 8. a place for all ages.
- 4.21. Support for the 20 Minute Neighbourhood is also set out in the emerging Surrey Local Transport Plan 4⁷⁹. Employment uses are also an important part of the town centre mix of uses. Whilst some office floorspace has been lost to residential uses the appropriate conversion of town centre floorspaces to employment space, particularly where this allows for shared workspaces and support for small businesses will be encouraged.
- 4.22. Opportunities for greater digital connectivity are also being explored for the Town Centre including the potential for The Square to be 5G enabled.
- 4.23. The Council’s Climate Change Study identifies opportunities for Camberley town centre to deliver low carbon heating and provide further adaptation and mitigation measures. These include opportunities to ‘green’ the environment and to provide urban shading as well as design issues relating to building orientation and layout. In line with the National Planning Policy Framework, 2021, design codes will be produced for Camberley Town Centre. These will be produced separately to the Local Plan.
- 4.24. Green spaces and vegetation including street trees are important in providing a wide range of environmental and quality of life benefits for those who live, work and visit the area. The Council will seek to ensure that developments include green features and link and enhance the existing network of green spaces. Where appropriate, the town centre site allocations policies set out the requirements for improvements to green infrastructure.

⁷⁸ Available online at: <https://www.tcpa.org.uk/guide-the-20-minute-neighbourhood>.

⁷⁹ Available online at: <https://surreyltp4.commonplace.is>.

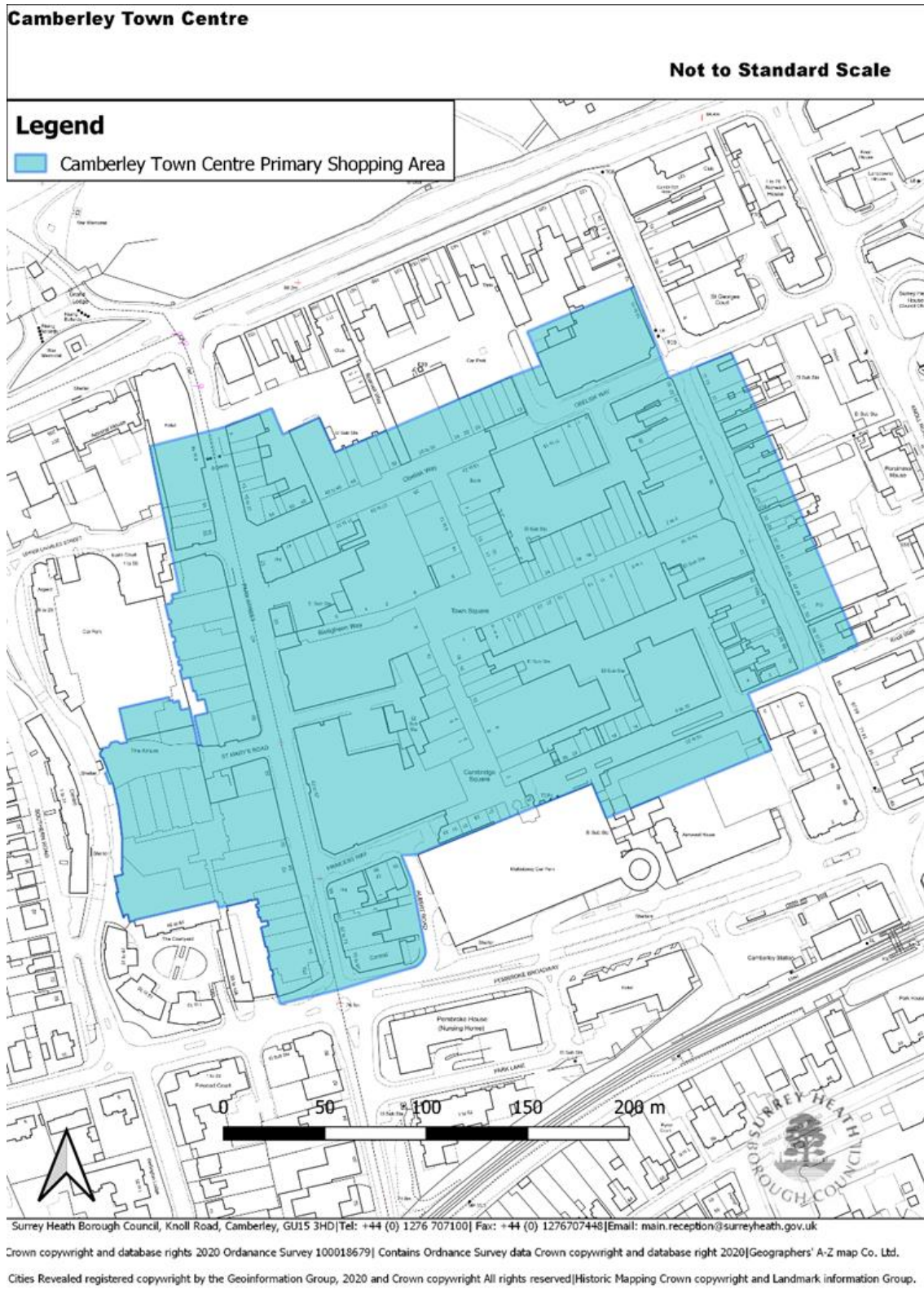


Policy CTC2: Camberley Town Centre Primary Shopping Area

- 4.25. The Primary Shopping Area (PSA) is where the main retail development in Camberley town centre is concentrated and where the Council considers that such concentration should remain. This includes The Square, the High Street and Park Street which contain frontages with different characters and scale and mix of uses but which collectively provide an important shopping focus.
- 4.26. The Area Action Plan extended the Primary Shopping Area to include the London Road Block and properties fronting the eastern side of the High Street. Having regard to the need for a more flexible approach to town centre uses and changes in demand for retail floorspace since the AAP was prepared, the recommendations in the Town Centre Uses Study are to focus the PSA on the blocks comprising The Square and The Atrium, bordered by the High Street to the east, Princess Way to the south, and Obelisk Way to the north. The Primary Shopping Area boundary has also been informed by the 2021 Retail Survey and is set out on the Policies Map and the Plan below.



Figure 8 – Camberley Town Centre Primary Shopping Area



- 4.27. National planning policy emphasises the need to ensure that town centres are rapidly adaptable to change and this message has been strengthened by Government in the light of the Covid-19 pandemic. To support flexibility and change in town centres, in September 2020 the Government introduced changes to the Use Classes Order, introducing a new E Use Class (Commercial business and service uses).
- 4.28. The new E Use Class includes the previous Class A1 shops (other than those less than 280sqm selling essential goods and at least 1km from another shop), Class A2 Financial and Professional Services, Class A3 Café and restaurants, the previous Class B1 uses (office, research and industrial), and some previous Class D uses: health and nursery facilities and indoor recreation uses including gyms. Other uses, i.e. pubs (previously Class A4), hot food takeaways (previously Class A5), and cinemas (previously Class D2), have become “sui generis”.
- 4.29. In addition to this in August 2021, further permitted development rights were introduced allowing conversion of most Class E uses to residential, subject to meeting relevant criteria such as size limits. The impact of these changes in terms of the ability of the Council to influence the type of uses in the town centre is significant. This will now be largely dictated by the market unless permission is required due to a planning condition or other restriction.
- 4.30. Whilst the need to be flexible and adaptable is recognised, the vitality of the town centre can be impaired when the core retail frontages are fragmented. A study by KPMG⁸⁰ on the impact of Covid-19 on town centres recognised that ‘shoppers are attracted to a cluster of shops rather than a single stand-alone outlet’. As some control over changes of use will remain where planning permission is required, the Council considers that it remains appropriate to seek to retain a retail core where the impact of a change of use on the vitality and viability of the centre can be considered. This is consistent with the NPPF 2021 which supports defining primary shopping areas and policies for the uses that will be permitted within them.
- 4.31. As the Plan progresses the Council will consider whether it would be appropriate to introduce an Article 4 Direction for the PSA to ensure that changes of use require planning permission and a retail core can therefore be more strongly protected.

⁸⁰ Available online at: <https://assets.kpmg/content/dam/kpmg/uk/pdf/2021/01/the-future-of-towns-and-cities-post-covid-19-how-will-covid-19-transform-england-s-town-and-city-centres.pdf>.



Policy CTC2: Camberley Town Centre Primary Shopping Area

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

Policy CTC3: Movement and Accessibility

- 4.32. The Camberley Town Centre AAP identified a range of issues relating to movement and accessibility within and around Camberley Town Centre. Since then some significant highway improvements have taken place including along the A30. However, ease of access is vital if Camberley is to remain an attractive destination for residents and visitors and to enable the increasing number of town centre residents to travel using a choice of travel modes.

Policy CTC 3 - Movement and Accessibility

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



- f) works to accommodate any other impacts upon the highway network arising from the development; and
- g) a travel plan for the town centre.

- 4.33. For town centres, transport has an important impact on how easily customers can access businesses and how attractive the centre feels as a place to spend time and therefore money with local businesses. Good quality access to Camberley town centre by walking, cycling and public transport increases the potential number of people who will choose to visit.
- 4.34. Collectively, the matters in Policy CTC1 and CTC3, along with delivery of the site allocations will help to support the principles of a compact and well-connected centre, reducing the need to travel. The street interviews conducted as part of the Town Centre Uses Study identified that 60% of respondents travelled to the centre by car but notably over 50% of journeys were less than 10 minutes suggesting that there is opportunity to increase the use of active travel modes into the town centre.
- 4.35. Surrey County Council as local highway authority, is preparing a new Local Transport Plan (LTP4) which seeks to deliver a carbon net zero transport system by 2050. LTP4 seeks to **avoid** the need for travel, **shift** travel to sustainable travel modes and **improve** emissions intensity and energy efficiency. The Council will work closely with the County Council to identify opportunities to deliver improvements to accessibility by active travel modes and public transport that arise through the new LTP4. This will include reviewing the level of parking provided in new developments. The County Council is currently preparing a Local Cycling and Walking Infrastructure Plan for Surrey Heath Borough which will help to inform additional improvements.
- 4.36. A number of highway improvements to The Meadows gyratory, the A30 and Camberley town centre improving access to the town centre have recently been completed or are underway. Improvements to the A30 that started in 2021 include; junction improvements, improved cycleways, alterations to the bus lanes and improved bus shelters, improved pedestrian facilities and alterations to traffic signals. These highway network improvements will maintain bus reliability, improve accessibility in and around the town centre, and improve peak hour delays on the A30 and are funded jointly by Surrey County Council, Surrey Heath Borough Council and the Enterprise M3 LEP.



- 4.37. Funding from the Highways England Designated Fund has been received by the County Council to progress feasibility design works and appraisal for a Camberley to Frimley Cycleway Scheme. This Fund seeks to promote schemes that encourage more travel by active travel modes (cycling and walking) locally. This route has been specifically selected as it is particularly impacted by the Strategic Road network, including the M3 bridge over Frimley Road which has a negative impact on attractiveness for active travel modes. The feasibility work will explore the possibility of creating a continuous cycle route between Camberley and Frimley.
- 4.38. Site allocations that lie within or close to Camberley Town Centre in Policy HAI set out the requirements to deliver accessibility improvements to the town centre.
- 4.39. Further work on a Corporate Town Centre Strategy and Masterplan will help to identify further details that will deliver the principles set out in Policy CTC3. In addition, a Transport Assessment will also be completed alongside the next stage of the Local Plan to identify the highways issues arising from the emerging Local Plan policies and allocations. This, and the emerging LTP4 will both inform future versions of the Local Plan and the identification of additional accessibility matters that need to be highlighted in the Local Plan policies and allocations.

Economy

- 4.40. Surrey Heath is characterised by a buoyant economy and a diverse economic base, with high technology industries strongly represented alongside traditional and advanced manufacturing. A key strength of Surrey Heath's economy is in the diversity of the sectors represented. Strong employment sectors include: specialist engineering and manufacturing; medical technology; information technology; financial / business services; logistics / distribution and health. The Borough Council also has an active Economic Development Team, providing inward investment support and support to growth and retention of local businesses.
- 4.41. The Strategic Economic Plan (SEP) for the Enterprise M3 Local Enterprise Partnership (LEP) Area 2018-2030 sets out that the growth ambition for the area should be an average growth rate of 4% per year to 2030. The LEP area has a high concentration of knowledge-based industries, with four key priority sectors: Aerospace and Defence, ICT and Digital Media, Pharmaceuticals and Professional and Business Services⁸¹.

⁸¹ The EM3 Priority sectors are set out on the Enterprise M3 Local Enterprise Partnership's website: <https://enterprisem3growthhub.co.uk/em3-sectors>.



- 4.42. The Borough forms part of a functional economic area, comprising the three local authority areas of Hart, Rushmoor and Surrey Heath. The three authorities have strong economic linkages and form part of a commercial property market, focused on the Blackwater Valley area. It is therefore important to view Surrey Heath's economy in the wider context of both the LEP area and the functional economic area, within which it is located.
- 4.43. The Surrey Heath Economic Development Strategy 2020 recognises that Surrey Heath has an active business community with several prestigious and global firms located in the Borough. The Strategy contains three principal economic objectives, which aim to maintain the Borough's competitive and entrepreneurial performance, enhancing the quality of place that makes Surrey Heath a desirable location for businesses, residents and visitors. The economic objectives of the Strategy are to work with stakeholders to create:
1. A sustainable place to live, work, shop and play, creating the conditions for growth through transformational actions in its town centres and significant employment sites;
 2. A great place for business to flourish, that is open for businesses, large and small; and
 3. A great place for people to succeed by ensuring the local economy trains, recruits and retains the right talent required for continued growth.
- 4.44. Surrey Heath's economic profile has identified some recognisable key high technology sectors with strong turnover and productivity prospects and a vibrant micro-business base. It suggests Surrey Heath can play a very active part in Enterprise M3 LEP's ambitions for a Sci:Tech corridor - the local economy matches the LEP's priority sectors very closely.
- 4.45. National planning policy sets out the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. This should be achieved through the identification of sites to meet forecasted employment needs over the plan period. The NPPF also states the Local Plan should also be flexible enough to accommodate needs that are not projected over the plan period, enabling a rapid response to changes in economic circumstances.
- 4.46. The Surrey Heath Employment Technical Paper 2019 (ELTP 2019) found there were net losses of office (E(g) Use Class) and industrial (B2 Use Class) floorspace in Surrey Heath over the period 2005-2019, although net gains were made in storage and distribution (B8 use class) and flexible (mixed B and E(g) Use Classes) employment floorspace. High residential land values in the Borough and significant land constraints can result in increased pressure on employment floorspace from other uses that are not in a B or E(g) use class. Maintaining a supply of employment land is essential for Surrey Heath's economy, which contributes to the Borough's high standard of living.



- 4.47. Policies in the Local Plan aim to ensure that there is sufficient employment land and buildings of the right type to help deliver economic growth in the Borough, supporting the Borough's position as a prosperous economic area. To help achieve this, the Local Plan's economic policies aim to:
1. Enhance existing, and enable the provision of new, high-quality employment space;
 2. Direct new employment provision to the most appropriate locations; and
 3. Support key employment sectors and micro businesses.
- 4.48. It is recognised that changes to the Use Classes Order that came into effect on 1st September 2020 mean that some uses in the defined Employment Areas may not need planning permission to change to other Uses. This specifically applies to employment uses that previously fell within Use Class B1 and which now fall within Use Class E along with other uses including shops, financial and professional services, cafes and restaurants, gyms, nurseries and health centres. However, national planning guidance makes clear that Class E Uses are principally suited for town centres. In light of the need to continue to ensure that there is a balanced supply of housing and employment land, it is considered appropriate to seek to protect Employment Uses (as defined in the Glossary - those falling within Use Classes B2, B8 and E(g)) within defined Employment areas where planning permission is required and where the evidence supports the need to do so.
- 4.49. Based on the future jobs growth scenarios assessed in the ELTP 2019, the forecast floorspace requirements for Surrey Heath amount to a need for between 5,356 and 68,048 square metres of B and E(g) class floorspace over the period to 2037 (with local adjustments made in respect of manufacturing jobs growth). This translates to a range covering a 0.4 to 15.9 hectare requirement for employment land, taking account of floorspace to land-take conversion rates for the different categories of employment land types⁸². Extending the forecasting period by a further three years, from 2019 up to 2040, the forecast employment floorspace requirements demonstrate a projected -1312 sqm reduction in required Employment floorspace to a need to plan for an increase of 79,839 sqm Employment floorspace. This translates to a range covering a 1.34 hectare surplus of employment land to a 18.5 hectare requirement for employment land, taking account of floorspace to land-take conversion rates for the different categories of employment land types.

⁸² For example, employment floorspace in an E(g)(Business) use class requires a lower amount of land-take than employment floorspace in a B2 (General Industry) use class as evidenced in the Employment Land Technical Paper 2019:

<https://www.surreyheath.gov.uk/residents/planning/planning-policy/evidence-base>.



- 4.50. The ELTP 2019 demonstrates that the lower range forecast requirements can be met from the existing supply of land allocations and extant permissions in the Borough, without there being a significant surplus of employment land. This indicates that demand for and supply of employment land are closely aligned. The ELTP 2019 concludes that the upper range forecasts can be met from the existing land supply as well as the redevelopment and intensification of older or poorer quality stock, and underutilised or redundant land at existing employment sites.
- 4.51. The evidence for employment land in Surrey Heath was prepared prior to the Covid-19 pandemic. Consequently, the long term implications for the way in which people work, and employment floorspace needs in light of the pandemic have yet to be fully established. The evidence base will be reviewed to take account of the effects of Covid-19 on the local economy, and revised employment needs in the Borough. The Enterprise M3 LEP has undertaken an early study of the economic impacts arising from Covid-19 within its area⁸³, which has suggested that some important employment sectors present in Surrey Heath have been affected, including aerospace, advanced manufacturing and the construction industry.

⁸³ EM3 Coronavirus Intelligence: <https://enterprisem3.org.uk/sites/default/files/2020-10/Impact%20of%20Covid%20on%20EM3%20Economy%20Summer%202020%20Metro%20Dynamics.pdf>.



Policy ER1: Economic Growth and Investment

Policy ER1: Economic Growth and Investment

- 1) The growth and retention of existing businesses and inward investment into Surrey Heath will be supported by:
 - a) protecting Strategic Employment Sites as defined on the Policies Map for Employment Use⁸⁴ and enabling the regeneration/redevelopment of these sites for employment uses (Policy ER2);
 - b) protecting Locally Important Employment Sites as defined on the Policies Map for Employment Use and enabling the regeneration/redevelopment of these sites for employment (Policy ER3);
 - c) encouraging the growth of small and micro businesses by protecting employment units capable for use by a small business or industry and supporting the siting of small to medium size employment units in Strategic and Locally Important Employment sites or other appropriate locations; and
 - d) encouraging development of the rural economy in accordance with Policy ER5 (Rural Economy).
- 2) Employment uses in Class E(g) on Strategic and Locally Important Employment Sites will be controlled by condition and/or legal agreement where up to date evidence demonstrates that there is a need to protect these uses in perpetuity.
- 3) Opportunities to develop the following key employment sectors, at Strategic and Locally Important Employment sites, will be encouraged and supported:
 - a) medical technology;
 - b) specialist/advanced manufacturing (including research and development) and logistics and distribution, particularly at established industrial locations in the Borough at Yorktown and Frimley;
 - c) information technology and financial/business services.
- 4) Large scale developments⁸⁵ should deliver local skills and training initiatives, unless it can be demonstrated that this is not feasible.

4.52. Planning for economic growth will ensure the Local Plan will support the continued development of a strong local economy and can continue to provide job opportunities for residents of Surrey Heath and surrounding areas.

⁸⁴ As defined in the Glossary and comprising uses within Classes B2, B8 and E (g).

⁸⁵ This will be determined on a case by case basis unless the Council prepares any Supplementary Planning Guidance on this issue but as an indication will include developments over 50 dwellings (net) or new commercial floorspace over 1,000m² (net).



- 4.53. Forecast job growth in Surrey Heath is 4,700 net additional jobs by 2040. The Employment Technical Paper 2019⁸⁶ concludes that the existing employment land in the Borough is sufficient to meet the projected future needs. Needs will therefore be met through unimplemented planning permissions, and the development and intensification of employment land at Strategic and Locally Important Employment Sites.
- 4.54. Through the protection of Strategic and Locally Important Employment Sites, the Local Plan will help to ensure the Borough's economy can continue to grow. This will also help retain available employment land for businesses that are aligned with the Enterprise M3 Priority sectors, enabling them to remain an important economic presence within the Borough.
- 4.55. The Council will support proposals for development of the Enterprise M3 Local Enterprise Partnership (EM3 LEP) sectors⁸⁷ at Strategic and Locally Important Employment Sites. Proposals for such uses outside of the defined employment sites will also be supported provided they are appropriately located and appropriate to their surroundings in size and scale.
- 4.56. There are a number of businesses in the medical technology and pharmaceutical industries in Surrey Heath including Sandoz UK. The Research and Development sector is also well represented in the Borough, with companies such as Lantmannen Unibake, Jenoptik Traffic Solutions, and Zehnder Group. There is a well-established specialist and advanced manufacturing sector which includes companies such as STIHL, Amazon Filters, BAE Systems, SC Johnson, and Krispy Kreme. Businesses in the finance sector located in Surrey Heath include Bank of America Merrill Lynch, and Cennox.
- 4.57. Micro businesses and growing businesses are a key component of the Borough's local economy⁸⁸, driving future economic growth in Surrey Heath. It is important that these types of organisations are supported and encouraged. The Council wishes to create an environment where growing businesses can flourish, adding to the diversification of organisations within the Borough and creating new jobs for local people.

⁸⁶ Surrey Heath Employment Technical Paper 2019: -
<https://www.surreyheath.gov.uk/residents/planning/planning-policy/evidence-base>

⁸⁷ The EM3 priority sectors as set out on the Enterprise M3 Local Enterprise Partnership's website: <https://enterprisem3growthhub.co.uk/em3-sectors>; and in paragraph 2 of the introductory text to the Economy and Retail Policies Chapter of this Plan.

⁸⁸ The Nomis Business Count 2019 demonstrates that nearly 90% of businesses in Surrey Heath are micro businesses:
<https://www.nomisweb.co.uk/reports/lmp/la/1946157335/report.aspx?town=surrey%20heath>.



- 4.58. Proposals that provide appropriate accommodation for micro businesses and small growing businesses will be supported where they are located on Strategic or Locally Important Employment Sites, or other appropriate locations in the Borough. The loss of established employment floorspace providing suitable accommodation for micro and growing businesses will generally be resisted, unless it can be demonstrated that the floorspace is no longer required. This must be supported by evidence of an active and appropriate marketing exercise undertaken for a period of at least twelve months which demonstrates that the premises are not reasonably capable of supporting small scale businesses.
- 4.59. As a minimum, the evidence should include: the length of time on the market, type of lease offered and sale price or rent levels advertised. However, in compliance with Policy ER2, proposals for changes of use from Employment Uses⁸⁹ to non Employment Uses at Strategic Employment Sites will not be permitted, unless they would provide small scale complementary use(s) that are not detrimental to the function and operation of the Strategic Employment Site.
- 4.60. A key element of economic success is having a skilled local workforce and providing opportunities to improve educational attainment and training. Where feasible, developers will be required to commit to construction training (and other forms of training if appropriate) as part of their project and to make their intentions clear in their planning applications, through for example the inclusion of, or commitment to, an employment and skills plan.

⁸⁹ As defined in the Glossary and comprising uses within Classes B2, B8 and E (g).



Policy ER2: Strategic Employment Sites

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

Policy ER2: Strategic Employment Sites

- 1) To contribute towards meeting the future economic growth needs of the Borough and the wider Functional Economic Area, the following sites are designated as Strategic Employment Sites as defined on the Policies Map, to be afforded the highest protection and safeguarding for Employment Uses⁹⁰:
 - a) Admiralty Park, Camberley
 - b) Albany Park, Frimley
 - c) Land at Knoll Road, Camberley Town Centre
 - d) Erl Wood, Windlesham
 - e) Former Defence Evaluation and Research Agency (DERA) Site Longcross, near Chobham
 - f) Former British Oxygen Company Site, Chobham
 - g) Mytchett Place, Mytchett
 - h) Frimley Business Park, Frimley
 - i) Lyon Way, Frimley
 - j) Watchmoor Business Park, Camberley
 - k) Yorktown Business Park, Camberley.
- 2) The redevelopment and regeneration of these sites will be supported to provide floorspace for Employment Uses⁹¹ that meets the needs of the market.
- 3) Small-scale proposals for changes of use or redevelopment to non Employment Uses will be supported where they would provide complementary use(s) that are not detrimental to the function and operation of the Strategic Employment Site.

⁹⁰ As defined in the Glossary and comprising uses within Classes B2, B8 and E (g).

⁹¹ As defined in the Glossary and comprising uses within Classes B2, B8 and E (g).



- 4.62. The Strategic Employment Sites are identified in the Employment Technical Paper Update 2019⁹². The sites are all larger than 1.5 ha, are considered to fulfil a strategic function within the Hart, Rushmoor and Surrey Heath Functional Economic Area and have the greatest alignment to the EM3 LEP priority sectors. As set out under Policy HA1, Sir William Siemens Square has not been included as a Strategic Employment Site but has been identified as a housing allocation following promotion of the site to the Council by the landowners and having regard to the need to provide for new homes in sustainable locations. Some of the Strategic Employment Sites support the Functional Economic Area's core sectors such as business services and industrial and distribution sectors.
- 4.63. There are four Strategic Employment Sites located in rural areas of the Borough, outside of settlement area boundaries: DERA, Longcross (near Chobham), Erl Wood, Windlesham, Former British Oxygen Company, Chobham and Mytchett Place, Mytchett. Development on these sites will need to meet the requirements of Countryside Policy GBC4. In addition, the sites at DERA, Erl Wood, and Former British Oxygen Company are also located within the Green Belt and development on these sites will need to satisfy the requirements of Policies GBC1 and GBC2. These sites are bespoke, meaning they are occupied by site specific employers. The sites are strategic in importance to the Borough's economy, due to their alignment with the EM3 LEP priority and niche sectors, and their size and scale.
- 4.64. The businesses and industries that have chosen to locate in Surrey Heath, and those that wish to relocate to the Borough require suitable land and premises to accommodate them. Therefore it is important that employment land is protected, especially at sites with a strategic function and employment accommodation types that businesses and industries require. The protection of such sites is also essential to meet anticipated employment needs over the plan period.
- 4.65. It may be possible to introduce small-scale non Employment class employment uses into the Strategic Employment Sites where they would provide complementary uses that would support businesses and employees. Examples of such complementary uses include cafés and sandwich bars that would cater for breakfast and lunchtime trade. The operating hours of such uses would be restricted accordingly. Such uses can support the operation and function of employment sites and improve the offer available to prospective tenants/occupiers.
- 4.66. The judgement about operation will consider whether the proposed use would affect the ability of established businesses, or potential future Employment Use occupiers, to carry out their activities without constraints. The judgement about function will consider the role that the site plays in the supply of land to meet Employment needs over the Local Plan period.

⁹² Surrey Heath Employment Technical Paper Update, 2019:
<https://www.surreyheath.gov.uk/residents/planning/planning-policy/evidence-base>.



Policy ER3: Locally Important Employment Sites

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

Policy ER3: Locally Important Employment Sites

- 1) To contribute towards meeting the future economic growth needs of the Borough, the following sites are designated as Locally Important Employment Sites as defined on the Policies Map, and will be given protection against loss to non Employment uses:
 - a) Bridge Road Trade and Industrial Park, Camberley
 - b) Linsford Business Centre Mytchett
 - c) Fair Oaks Airport Employment Land
 - d) SC Johnson, Frimley Green
 - e) St Georges Industrial Estate and Helix Business Park, Camberley
 - f) Tanners Yard, Bagshot
- 2) The redevelopment and regeneration of these sites will be supported to provide floorspace for Employment Uses⁹³ that meet the needs of the market.
- 3) The change of use or redevelopment of land and buildings in Employment Use to non Employment Uses within the defined Locally Important Employment Sites will only be permitted where it can be demonstrated that:
 - a) there are no strong economic reasons to retain the Employment Use;
 - b) market signals indicate that the premises / site are unlikely to come back into an Employment Use;
 - c) the proposal would generate a level of employment that is at least equivalent to the existing use; and
 - d) the proposal would not be detrimental to the function and operation of the wider site; or
 - e) the site is not appropriate for the continuation of its present use or any Employment Use due to a significant detriment to the environment or amenity of the area.

⁹³ As defined in the Glossary and comprising uses within Classes B2, B8 and E (g).



Reasoned Justification

- 4.68. The protection and retention of the Borough's Locally Important Employment Sites is crucial to maintain a supply of employment land and premises that will meet the economic needs of the Borough and wider Hart, Rushmoor and Surrey Heath Functional Economic Area (FEA). The Locally Important Employment Sites are identified in the Employment Technical Paper Update 2019⁹⁴. The sites are all larger than 0.3 ha in size.
- 4.69. The loss of land within Locally Important Employment Sites to non Employment Uses could generate additional pressure for the release of land for Employment Uses in less-acceptable locations. Policy ER3 therefore contains criteria for considering proposals for non- Employment Uses at these sites.
- 4.70. The regeneration and intensification of existing employment sites will be supported to allow businesses to expand and enable the provision of modern employment stock to replace properties that have reached, or are reaching, the end of their functional economic life. However, it is also recognised that some of the Locally Important Employment Sites offer suitable locations for businesses that do not require modern grade A accommodation, and benefit from the lower rents or leases provided by lower grade accommodation.
- 4.71. Policy ER3 identifies that market signals will be taken into account when determining applications for the change of use within a Locally Important Employment Site to a non-Employment Use. In addition, the Council requires applicants to demonstrate that there would be no strong economic reasons why the premises or site should not be lost to alternate uses.
- 4.72. An indicative list of the evidence that the Council will require to be submitted with proposals for non-Employment Uses at Locally Important Employment Sites is detailed below:

⁹⁴ Surrey Heath Employment Technical Paper Update, 2019:
<https://www.surreyheath.gov.uk/residents/planning/planning-policy/evidence-base>.



Market Signals Evidence

1. An active and appropriate marketing exercise must have been undertaken for a period of at least twelve months which demonstrates no interest from prospective buyers/tenants. This must include the following evidence, as a minimum:
 - a) the length of time on the market,
 - b) type of lease offered;
 - c) sale price or rent levels advertised;
 - d) Information should be provided on premises similar to those that are proposed to be lost which are being marketed in the local area; and
 - e) The findings of the most recent Employment Land Review or other equivalent study and annual monitoring data on employment land will also be used to determine whether there is a need for such employment premises (or sites) to meet future needs.

Demonstrating that There Are No Strong Economic Reasons

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



Policy ER4: Yorktown Business Park

- 4.73. Yorktown Business Park is a large employment site located in the west of Camberley covering an area of approximately 37 hectares. Due to Yorktown's size, redevelopment opportunities, and wide range of accommodation attracting both small and medium-sized enterprises (SMEs) and larger organisations, the site has the potential and capacity to attract future economic development to Surrey Heath.

Policy ER4: Yorktown Business Park

- 1) The role of Yorktown Business Park as the Borough's largest employment site and most extensive cluster of industrial uses is recognised. Proposals for redevelopment or enhancement for Employment Uses⁹⁵, including the refurbishment of existing stock, and subdivision of larger units to provide multiple units will be supported.
- 2) Proposals including provision of a net increase in the overall amount of Employment Use floorspace will be supported.
- 3) The redevelopment of derelict or underutilised land for Employment Uses or Sui Generis uses with a strong employment element will also be supported, provided proposals would not result in a net reduction to the overall amount of Employment floorspace at the site.
- 4) Proposals will be required to support the delivery of a structured landscape setting, in line with the Yorktown Landscape Strategy Supplementary Planning Document.

- 4.74. Yorktown Business Park houses a diverse range of employment types. The site comprises industrial areas, business centres and trade parks. Although the majority of uses at the site are industrial, warehousing and storage and distribution, it also accommodates office and research and development uses. In addition, there are a number of non-traditional employment uses established at the site that fall within a Sui Generis use class, including self-storage, vehicle repairs, and trade counter businesses. Employment buildings range from workshops and manufacturing units that date from the mid-20th century to large modern warehouses. Parts of the site have been upgraded and redeveloped in recent years. Many of the more recent developments consist of warehouse units with flexible office or industrial space.

⁹⁵ As defined in the Glossary and comprising uses within Classes B2, B8 and E (g).



- 4.75. Proposals for developments in a Sui Generis use class that have a strong employment element such as those listed above will be supported where it can be demonstrated that the proposal will not result in the reduction of Employment Uses⁹⁶ at the site. This could include proposals that replace existing non Employment Uses, or proposals that are located on derelict or underutilised land such as car parks or service areas that are surplus to requirements. The redevelopment of this type of land will be beneficial to support the function and performance of Yorktown Business Park as an employment site. Such new developments will create opportunities for the regeneration of Yorktown Business Park and encourage employment growth at the site.
- 4.76. The Surrey Heath Employment Land Technical Paper (ELTP) (2019)⁹⁷ projects a slight decline in industrial and manufacturing uses over the plan period in both Surrey Heath and the wider Functional Economic Area. However, the ELTP demonstrates that growth is predicted in office businesses, with particular growth in professional, scientific and technical activities. Such businesses require high quality office premises, however the ELTP indicates there is a limited amount of this type of stock available to the market in Surrey Heath. Accordingly, whilst industrial uses at Yorktown Business Park will be supported, the further diversification of employment uses will help ensure the site continues to provide the accommodation that businesses in the Functional Economic Area require.
- 4.77. The Yorktown Landscape Strategy Supplementary Planning Document (SPD) provides a landscape framework to guide development in the Yorktown area of Camberley. The purpose of the Landscape Strategy is to improve the environment and assist the regeneration of the Yorktown area. This will be achieved through requiring specific landscaping and design principles to be implemented as part of development proposals or through the enhancement of existing sites.

⁹⁶ As defined in the Glossary and comprising uses within Classes B2, B8 and E (g).

⁹⁷ Employment Land Technical Paper 2019: -
<https://www.surreyheath.gov.uk/residents/planning/planning-policy/evidence-base>.



Policy ER5: Rural Economy

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

Policy ER5: The Rural Economy

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



3) Within settlements in the rural areas⁹⁸ development for economic uses will be supported which are of a use and character appropriate to the proposed site and to the scale of the settlement and which do not have an unacceptable adverse impact on local communities particularly in terms of traffic, noise, lighting and visual impact.

- 4.79. The National Planning Policy Framework (NPPF) emphasises that planning policies should support sustainable economic growth in rural areas by taking a positive approach to new development. Local Plans should promote a prosperous rural economy by supporting the sustainable growth and expansion of all types of business and enterprise in rural areas.
- 4.80. Within the rural areas in Surrey Heath there are a range of economic uses. The rural economy has an important role to play in the overall economic prosperity of the Borough and contributes to economic diversification broadening the overall mix of employment uses.
- 4.81. The need for new jobs, and support for existing businesses is not limited to the urban areas and Strategic and Locally Important Employment Sites. There are existing rural businesses which may need to expand or re-locate which are vital to local employment provision and local services in rural areas. This includes farm diversification schemes.
- 4.82. Diversification of an agricultural use can help to sustain agricultural uses, increase household income and provide job opportunities.
- 4.83. The re-use and adaptation of non- residential buildings in countryside and Green Belt locations can have a positive role to play in maintaining stewardship of rural areas and in providing opportunities for bringing redundant buildings into productive economic use, especially where these lie within the rural fringe.
- 4.84. As such the Borough Council will support the rural economy, through positive support for appropriate farm diversification schemes and the re-use or adaptation of existing buildings or where appropriate, replacement buildings for economic purposes. Diversification or economic development could include allowing re-use or replacement buildings for small scale employment opportunities in traditional skills or crafts, farm based food packaging, small scale offices, small scale light industrial or low impact storage as well as for community and public uses.

⁹⁸ As defined in the Surrey Heath Local Area Profiles section of this Plan.



- 4.85. Whilst recognising the value of supporting appropriate economic development in rural areas, the Council is mindful of the need to ensure that development does not impact upon the purposes of the Green Belt or the character or function of the countryside, as well as the need to consider other issues such as the impact on highways dealt with by other Policies in the Plan. Proposals for economic development that would require extended, new or replacement buildings in the countryside or Green Belt will need to be accompanied by a Business Plan providing justification for the proposed development including for example, justification for the size of the premises required, evidence of viability and the availability of buildings for conversion.
- 4.86. Within settlements in the rural areas a more flexible approach will be taken having regard to other Policies in this Plan and to the need for any proposed economic use to be appropriate in terms of scale and siting having regard to the proposed location, the scale of the settlement and to the impact on issues including highways, local amenity and design.

Policy ER6: Frimley Park Hospital

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

Policy ER6 Frimley Park Hospital

- 1) Development proposals for the retention and improvement of healthcare facilities at Frimley Park Hospital will be supported provided that:
 - a) the proposals form part of a comprehensive development strategy or business plan that ensures that the continued development of the hospital is properly coordinated;
 - b) where appropriate it is accompanied by a transport strategy to include:
 - i. a parking strategy;
 - ii. provision for an increase in the proportion of staff, patients and visitors who can access the hospital by public transport, cycling and walking; and
 - iii. the mitigation of any adverse impacts of traffic and car parking on the highway network and surrounding community;



- c) there will be no significant detrimental impact on residential properties within the site or surrounding residential properties;
- d) there is no detrimental impact to protected trees;
- e) the proposals deliver a biodiversity net gain in line with Policy E3;
- f) the proposal incorporates climate change mitigation measures, including on-site renewable energy generation, consideration for low carbon heating and making best use of existing combined heat and power (CHP) networks;
- g) the proposal incorporates climate change adaptation measures, including reducing the risk of seasonal overheating through appropriate design.

- 4.89. Frimley Health NHS Foundation Trust operates across three main hospitals - Frimley Park in Frimley near Camberley, Heatherwood in Ascot and Wexham Park near Slough. The trust also runs outpatient clinics and diagnostic services from Aldershot, Farnham, Fleet, Windsor, Maidenhead, Bracknell and Chalfont St Peter to bring these services closer to local communities.
- 4.90. Frimley Park Hospital provides acute services to a population of 400,000 people across north-east Hampshire, west Surrey and east Berkshire. It serves a wider population for some specialist care including emergency vascular and heart attacks. Frimley Park also hosts the Defence Medical Group South East with military surgical, medical and nursing personnel working alongside the hospital's NHS staff providing care to patients in all specialities.
- 4.91. The Hospital is the Borough's largest employer, employing over 5,500 staff and providing a comprehensive range of services. In 2019 planning permission was granted for a new £30m diagnostics and inpatient building and associated internal road alterations. This will also provide additional bedspaces which will help to relieve bedspace occupancy which is currently higher than the national target.
- 4.92. Residential properties abound the wider hospital site to the north east (High Beeches and Denton Way) and west (Gilbert Road). The Grove, a grassed and treed open space that is common land lies to the south. Frimley Park Mansion, a Grade II Listed Building which provides a training facility and grounds, occupied by the Ministry of Defence is located to the south west, and sits within Frimley Park, a Registered Park and Garden which is also Grade II Listed. The M3 adjoins the hospital site to the north. A number of trees within the hospital site are subject to Tree Preservation Orders.
- 4.93. It will be important that any significant new proposals form part of a wider comprehensive masterplan to ensure that the Trust is making the most efficient use of space.



- 4.94. One of the main issues affecting the site is local congestion and parking impacts. Parking capacity on the site is limited and this has put pressure on parking in surrounding residential streets although much of this is now controlled through residents parking schemes. Congestion on local roads particularly at the Hospital roundabout and Toshiba roundabout is also having an impact on the attractiveness of Frimley as a place to locate for existing and new businesses. The Council will continue to work with Surrey County Council as the highway authority to seek measures to help reduce congestion on the surrounding road network.
- 4.95. Proposals will therefore be expected to be supported by detailed evidence of the impacts on the highway and parking demand on the site and how these will be mitigated. Measures to increase trips by active and sustainable modes of travel should be included, including through a Travel Plan. Proposals should also have regard to the Surrey Heath Walking and Cycling Infrastructure Plan, produced by Surrey County Council.
- 4.96. Development proposals for the site should incorporate climate change mitigation and adaptation measures in accordance with policies included in the Plan as well as delivering biodiversity and environmental net gains. Frimley Park Hospital and surrounding areas represent an area of great potential for low carbon heat networks, as identified in the Surrey Heath Climate Change Study⁹⁹, with the Hospital representing a major source of heat demand.

⁹⁹ Available online at :

www.surreyheath.gov.uk/sites/default/files/Surrey%20Heath%20Local%20Plan%20-%20Climate%20Change%20Study.pdf .



Policy ER7: Edge of Centre and Out of Centre Proposals

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

Policy ER7: Edge of Centre and Out of Centre Proposals

Sequential Test

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

Impact Assessment

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

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



Sequential Test

- 4.99. The NPPF requires main town centre uses to be located in Designated Centres, then in an edge of centre location and only if suitable sites are not available should an out of centre site be considered. The sequential test should be applied to applications for all retail or other main town centre uses that are located outside of Surrey Heath's Designated Centres and that are not located on other sites allocated for such uses. The sequential test need not be applied to proposals for retail or main town centre uses located on sites within Designated Neighbourhood Parades, as it is considered such uses are appropriate within these designated areas.
- 4.100. The sequential test should look Borough wide and will be applied to development proposals for retail and other main town centre uses, in order of locational preference:
1. Sites located within Camberley Town Centre, District and Local Centres or other designations allocated for such uses;
 2. Sites located within edge of centre locations, as defined in Annex 2 of the NPPF;
 3. Other sites that are accessible by a range of sustainable transport options, including public transport, cycle, on foot, and by people with disabilities.

Impact Assessment

- 4.101. Applications for retail and leisure proposals that are outside a Designated Centre and are not on sites that are allocated for such uses must be accompanied by an impact assessment where they exceed 280 sqm gross as set out in this policy.
- 4.102. Surrey Heath's designated centres should continue to be active, viable and sustainable places providing a range of services for the catchments and communities they serve. The requirement for impact assessments will help to protect the trading performance, and overall vitality and viability of the Borough's designated centres from adverse impacts of new retail and leisure developments in less suitable locations.
- 4.103. The Surrey Heath Town Centre Uses and Future Directions Study (2021) sets out that retail and leisure developments lower than the NPPF size threshold of 2,500 sq. m. gross floorspace are likely to have impacts upon Designated Centres in the Borough. Additionally, developments below 2,500 sq. m. gross floorspace may impact cumulatively upon the Borough's Centres.
- 4.104. From the evidence in the Town Centre Uses Study, floorspace thresholds have been identified for retail and leisure development proposals that are outside of Designated Centres and are not on sites that are allocated for such uses. This has indicated that all applications for retail and leisure proposals in the Borough above a threshold of 280 sq. m. gross floorspace should provide an impact assessment.



- 4.105. Where impact assessments are required, they should include an assessment of:
 1. the impact of the proposal on existing, committed and planned public and private investment in Camberley Town Centre and any District or Local Centres; and
 2. the impact of the proposal on the vitality and viability of Camberley Town Centre and any District or Local Centres as specified in this policy, including consumer choice and trade.
- 4.106. Where an impact assessment requires review by an independent specialist as part of a planning application process, this will be paid for by the applicant.

Policy ER8: District and Local Centres

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

POLICY ER8: District and Local Centres

- 1) The boundaries of the following designated District and Local Centres are shown on the Policies Map along with the Primary Shopping Areas. For Local Centres, the boundary of the Primary Shopping Area is the same as the boundary of the Local Centre.
- 2) The District Centres are:
 - a) Bagshot
 - b) Frimley
- 3) The Local Centres are:



- a) Chobham
 - b) Frimley Green
 - c) Lightwater
 - d) Watchetts
 - e) Windlesham.
- 4) Within District and Local Centres, proposals for retail uses (Class E(a) and F2(a)) will be permitted provided they are in proportion to the scale and function of the centre.
 - 5) Proposals for other Main Town Centre uses (as defined in the Local Plan Glossary¹⁰⁰) will be permitted provided they satisfy all of the following criteria:
 - a) They are appropriate to the Centre in scale and function;
 - b) They maintain or enhance the Centre's vitality and viability;
 - c) They provide an active frontage, if at ground floor level, such as a shop front or window display, which is in keeping with the character of the Centre;
 - d) They would not result in loss of amenity in terms of noise, fumes, vibrations, odour, or disturbance.
 - 6) The loss of Main Town Centre uses at ground floor to other uses, including the loss of retail units within Class F2(a), will only be permitted where it can be demonstrated that the existing use is no longer viable. Such proposals must meet the above criteria and must also be supported by evidence that demonstrates active and appropriate marketing for a period of at least 12 months.
 - 7) Residential development and B2 and B8 uses at ground floor level will not be permitted in District and Local Centres.
 - 8) Residential development in a C3 or C4 use class at first floor level or above will be supported within District and Local Centres. Uses above ground floor level should have a safe and convenient access and must not inhibit the functioning of the ground floor use.

¹⁰⁰ Main Town Centre Uses: The uses that should normally be found within defined town centres, including uses within Class E, Class F1, F2 and certain sui generis uses i.e. retail development, leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices and employment uses appropriate to a town centre location; schools and colleges; places of worship; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).



- 4.110. District and Local Centres should be protected and enhanced. The Centres play an important role in the sustainability of the Borough, providing locations which people can reach by walking, cycling or public transport.
- 4.111. With an increase in people working at home due to Covid-19, access to local facilities found in the District and Local Centres, and the Neighbourhood parades has become even more important to provide day to day facilities for local residents.
- 4.112. The challenges faced by local businesses including those in District and Local Centres has been recognised by the Government through a number of measures including amendments to the Use Classes Order which came into effect on 1st September 2020. This created a new Use Class E which combines a range of town centre uses including shops, financial and professional services, cafes and restaurants, gyms, health centres and offices. As changes of use between these uses may not now require planning permission there are likely to be a more limited number of change of use proposals which can be considered by the Council. Through the Use Classes Order amendments the Government has also recognised the role of small retail units selling essential goods through the creation of Use Class F2(a).
- 4.113. Policy ER8 is supported by the Retail Site Survey Background Paper 2021, which assesses the uses and vacancy rates in designated centres in the Borough and takes into account the revisions made to the Use Classes Order in 2020. The Paper demonstrates that at the time of the survey Surrey Heath's District and Local Centres were generally performing well, despite the impact of Covid-19 with the highest frequency of uses in 'shop' use (Class E(a)) and low vacancy rates. The recommendations in the Background Paper have also been used to inform the proposed District and Local Centre boundaries and Primary Shopping Area designations.
- 4.114. As a result of the most recent Retail Survey two changes have been made to the shopping centre hierarchy. Watchetts Centre is situated in the west of Camberley on Frimley Road. It was previously a designated Neighbourhood Parade but due to its size and a wider range of retail and community uses than could be expected from a Neighbourhood Parade, it is now designated as a Local Centre.
- 4.115. Deepcut Centre lies along Deepcut Bridge Road and was previously identified as a Local Centre. However, the latest Retail Survey showed a limited number of units compared to other local centres and no active retail units. It is therefore now designated as a Neighbourhood Parade under Policy ER9.



- 4.116. For proposals at ground floor level that are not for an E(a) (retail) use, the proposal should be for an alternative Main Town Centre use, and applicants should provide evidence with their application to show that the development would contribute to the vitality and viability of the centre and would maintain an active frontage. This is in order to maintain a healthy balance of retail and other uses within centres, also recognising that there should be flexibility in order to take account of market conditions and to maintain healthy centres.
- 4.117. The loss of Class E(a) or Main Town Centre uses at ground floor level to other uses can be harmful to the vitality and viability of District and Local Centres. However, it is recognised that where units have been vacant for a sustained period of time, it would be better for the overall health of the Centre to bring them back into use. Evidence of active and appropriate marketing for a period of no less than 12 months must be submitted for such proposals which demonstrates that the premises are not reasonably capable of being used or redeveloped for an E (a) class or Main Town Centre use. As a minimum, the evidence should include: the length of time on the market, type of lease offered and sale price or rent levels advertised.
- 4.118. Proposals for Main Town Centre uses in close proximity of the defined District and Local Centres will be tested against the criteria in Policy ER7 (Edge of Centre and out of Centre Proposals).
- 4.119. All proposals within designated Centres must have regard to the requirements set out in Policy DHI - Design Principles, in relation to the character and amenity of the surrounding area. This includes consideration of the cumulative effect of the development proposal with existing uses.



Policy ER9: Neighbourhood Parades

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

Policy ER9: Neighbourhood Parades

- 1) The boundaries of the following designated Neighbourhood Parades are shown on the Policies Map:
 - a) Beaumaris Parade, Frimley Green
 - b) Bisley (Guildford Road)
 - c) Chertsey Road Parade, Chobham
 - d) Deepcut
 - e) Farm Road Parade, Frimley
 - f) Frimley Road and London Road Parades, Camberley
 - g) Heather Ridge Arcade, Heatherside
 - h) Mytchett (Mytchett Road)
 - i) Dean Parade, Old Dean¹⁰¹
 - j) The Parade, Gosden Road, West End.
- 2) Within Neighbourhood Parades, development proposals will be permitted provided they satisfy all of the following criteria:
 - a) They are appropriate to the Neighbourhood Parade in scale and function;
 - b) They maintain or enhance the Neighbourhood Parade's vitality and viability;

¹⁰¹ Dean Parade, Old Dean, Camberley will also be subject to the requirements of Policy ER10 – Old Dean.



- c) They would not undermine the retail and service function of the Neighbourhood Parade;
 - d) They would not result in loss of amenity in terms of noise, fumes, vibrations, odour, or disturbance;
 - e) They would provide an active frontage, if at ground floor level, such as a shop front or window display, which is in keeping with the character of the Neighbourhood Parade;
 - f) They would contribute to the provision of a range of retail, service and community uses, if at ground floor level, which provide for the day-to-day needs of local people.
- 3) Residential development and B2 and B8 uses at ground floor level will not be permitted in Neighbourhood Parades.
 - 4) Residential development in a C3 or C4 use class at first floor level or above will be supported within Neighbourhood Parades. Uses above ground floor level should have a safe and convenient access and must not inhibit the functioning of the ground floor use.

- 4.122. Neighbourhood Parades are particularly valuable in providing for the everyday needs of their surrounding communities. They form a network of community hubs that play an important role in the sustainability of the Borough, providing shops and facilities people can reach by cycle or on foot, rather than by car. Some of the Borough's Neighbourhood Parades are also accessible by public transport via the bus network.
- 4.123. Policy ER9 is supported by the Retail Site Survey Background Paper 2021, which assessed designated Centres and Neighbourhood Parades in the Borough, proportions of use by classifications within the designated areas, and vacancy rates. The Retail Site Survey Background Paper demonstrated that Surrey Heath's Neighbourhood Parades were generally performing well, with low vacancy rates overall.
- 4.124. Greater flexibility is afforded for ground floor development proposals in Neighbourhood Parades, to reflect the importance of providing a mix of uses within such designated areas, including retail, service and community uses. Such flexibility is also necessary in order to take account of market conditions and to maintain vitality and viability of Neighbourhood Parades.
- 4.125. All proposals within Neighbourhood Parades must have regard to the requirements set out in Policy DHI – Design Principles, in relation to the character and amenity of the surrounding area. This includes consideration of the cumulative effect of the proposed use with existing uses.



Policy ER10: Old Dean

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

Policy ER10 Old Dean

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

Reasoned Justification

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



5. Section 5: Infrastructure

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

Policy IN1: Infrastructure Delivery

Policy IN1: Infrastructure Delivery

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



- improvements necessary to mitigate any impacts on the wider highway network;
- iv. flood risk measures;
- v. the delivery and ongoing maintenance of formal and informal open space;
- vi. the delivery of agreed mitigation measures with regards to the Thames Basin Heaths Special Protection Area.
- b) Infrastructure phasing is agreed with the Council in partnership with relevant partners and ensures that infrastructure is operational prior to, or alongside the development it will serve; and
- c) Infrastructure is designed and located to be accessible to all; and
- d) It can be demonstrated that all opportunities for dual use have been explored and maximised; and
- e) Engagement with utilities and service providers including Surrey County Council have taken place, as appropriate to the development; and
- f) There is no loss or reduction in capacity of existing infrastructure unless:
 - i. the loss of a Community Facility is compliant with Policy IN3; or
 - ii. for other infrastructure, replacement services or facilities are provided on-site or within the vicinity, which meet the needs of the local population; or
 - iii. necessary services can be delivered from other facilities without leading to, or increasing any shortfall in local provision; or
 - iv. it has been clearly demonstrated that there is no need for the facility.
- 4) Viability will only be considered a constraint in exceptional circumstances.
- 5) To demonstrate viability constraints to the Council's satisfaction proposals should be supported by an independent viability assessment on terms agreed by the local planning authority and funded by the developer/applicant. If there are significant additional costs not anticipated through the Local Plan Viability Assessment, these should be clearly set out within the viability assessment.
- 6) Developers will be expected to pay towards the Council's costs of monitoring the implementation and payment of planning contributions.

Reasoned Justification

- 5.4. National planning policy and guidance sets out that planning policies should be informed by evidence of infrastructure needs and make sufficient provision for infrastructure and set out the contributions expected from development.



- 5.5. The Draft Surrey Heath Infrastructure Delivery Plan (2022) sets out the social, environmental and economic infrastructure that will be required to support the development and growth set out in the Local Plan. The Infrastructure Delivery Plan is a 'living document' which will be updated over time.

Funding mechanisms

- 5.6. Where existing infrastructure is considered insufficient to accommodate new development, the Council will seek contributions or measures either by the provision of on-site facilities and/or a contribution towards enhancement of off-site facilities including strategic infrastructure. Where on-site provision or financial contributions are made, arrangements for the on-going maintenance of facilities will be required.
- 5.7. There are a number of mechanisms by which the Council can seek the provision or funding of infrastructure alongside new development. Provision will be secured through planning obligations (S106) and/or the Community Infrastructure Levy as relevant. Such contributions may be pooled, in order to allow necessary infrastructure to be secured in a fair and equitable way insofar as is compliant with relevant legislation. Where planning obligations are sought these will be consistent with the following legal tests:
1. Necessary to make the development acceptable in planning terms;
 2. Directly related to the development;
 3. Fairly and reasonably related in scale and kind to the development.
- 5.8. The Council adopted a CIL Charging Schedule and an Infrastructure Delivery SPD in 2014. These set out how infrastructure delivery from CIL contributions and from S106 planning obligations will be used together to secure the delivery of infrastructure. In September 2019 the Government made some significant amendments to the CIL Regulations which means that previous restrictions on pooling S106 contributions no longer exists. The Council will review the need to update CIL and the SPD in the light of the emerging Local Plan and revised CIL Regulations.
- 5.9. At the time of preparing this Draft Plan the Government has set out the intention to introduce a new Infrastructure Levy to replace CIL and S106. Once further details of the new Levy are published these will be reflected in the next version of the emerging Local Plan.
- 5.10. The Council is required to produce an Infrastructure Funding Statement that sets out what CIL and S106 monies have been received and how they have been spent. It also looks forward for two years and sets out anticipated income and how this will be spent. The most recent Surrey Heath Infrastructure Funding Statement was produced in December 2021.



Infrastructure Contributions

- 5.11. Applicants should engage with relevant service providers at an early stage in the planning process. Where new development creates a need for additional infrastructure a programme of phasing and delivery must be agreed with relevant partners before development begins. Measures may be put in place through S106 agreements or other mechanisms to ensure that development does not proceed in advance of appropriate and necessary infrastructure.
- 5.12. Policy INFI sets out an indication of the types of infrastructure where contributions or provision may be expected from development. The infrastructure required in relation to site specific allocations is set out in policies HAI – HA4 of this Plan. Contributions may be sought towards various stages of infrastructure delivery including:
 1. Initial costs e.g. design and development work; and/or
 2. Capital costs; and/or
 3. Ongoing revenue such as the management and maintenance of services and facilities.
- 5.13. National guidance on delivering education provision was published in April 2019¹⁰². The Borough Council will work closely with Surrey County Council to ensure that the need for further education provision is delivered in line with this guidance.
- 5.14. The contributions expected from development are currently set out in the CIL Charging Schedule and SPD. Over the life of the Plan the costs of delivering infrastructure are likely to change and therefore specific costs whether through CIL or planning obligations will continue to be set out on the Council's website and/or in Supplementary Planning Guidance.

Viability

- 5.15. Infrastructure and viability considerations will be assessed through the preparation of a Local Plan Viability Study that will be prepared to support the next stage of the Local Plan. In line with national guidance, planning applications that comply with adopted Local Plan policies will be assumed to be viable.
- 5.16. The Council will therefore only consider the viability of development proposals at the planning applications stage in exceptional circumstances, for example where:
 1. required planning obligations are in addition to those considered as part of the Local Plan's viability appraisal; or

¹⁰² Available online at: www.gov.uk/government/publications/delivering-schools-to-support-housing-growth.



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

Policy IN2: Transportation

- 5.19. New development often brings with it pressure on the existing highway network and the need for new transport infrastructure. The Council will seek to ensure that wherever possible, opportunities for sustainable means of travel are provided, including through improved walking and cycling routes.
- 5.20. The Council will work closely with Surrey County Council as the Local Highway Authority in the consideration of impacts on the highway network, on the evidence required to support development proposals, on delivering vehicle and cycle parking provision, and in determining opportunities for more sustainable travel. A Transport Assessment is currently being undertaken to assess the impacts of the Spatial Strategy on the highway network and potential mitigation measures that may be needed. This will inform the next stage of the Local Plan.

Policy IN2: Transportation

- 1) New development will be required to provide and/or fund the provision of suitable access and transport infrastructure and services that are necessary to make it acceptable, including the mitigation of otherwise unacceptable impacts on highway safety and/or any severe residual cumulative impacts on the road network. This mitigation will:



- a) maintain the safe operation and the performance of the Local Road Networks and the Strategic Road Network to the satisfaction of the relevant highway authorities; and
 - b) address otherwise adverse material impacts on communities and the environment including impacts on amenity and health, noise pollution and air pollution.
- 2) New development will be supported which:
- a) is located where travel can be minimised and the use of sustainable transport modes is maximised;
 - b) seeks to improve transport capacity and opportunities for travel by rail or bus transport;
 - c) provides safe, convenient access both within the development and to adjoining areas for all potential users including those with disabilities, giving priority to walking and cycling routes over vehicular traffic and maximising catchment areas for bus or other public transport services;
 - d) provides appropriate vehicular and cycle parking in accordance with the Councils-most recently adopted standards unless the provision of a car club, or car free development is agreed;
 - e) provides Electric Vehicle Charging points in accordance with the Councils adopted standards;
 - f) incorporates the flexibility for embracing technological advances in transport, such as intelligent vehicle charging, wayfinding for parking spaces, car sharing schemes, and car park management.
- 3) New development that generates significant amounts of movement will:
- a) provide sufficient information such that the transport impact can be assessed through a Transport Statement or Transport Assessment in accordance with the thresholds set out in the Local Planning Authority's Local Validation List, and advice from Surrey County Council;
 - b) require a Travel Plan which will be proportionate to the size of the new development.

Reasoned Justification

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



The Surrey Local Transport Plan (STP)

- 5.22. Surrey County Council's third Local Transport Plan covers the period from April 2011 to March 2026 and sets out the strategy to help people to meet their transport and travel needs effectively, reliably, safely and sustainably within Surrey, in order to promote economic vibrancy, protect and enhance the environment, improve the quality of life, and reduce carbon emissions. It sets out strategies that are incorporated into Local Plan Transport Policy covering effective, reliable, safe, and sustainable transportation.
- 5.23. Surrey County Council is producing an updated Local Transport Plan called LTP4 which includes plans to reduce the 46% of carbon emissions currently generated by transport. The LTP4 was consulted on between July and October 2021 and will supersede LTP3 following its adoption in 2022. The Proposals to 2030 and beyond include: increasing safer and improved walking and cycling routes to encourage people out of their cars; providing more charging points and parking for electric vehicles; more bus services; charging for transport use and introducing car clubs; as well as improving internet connections and redesigning neighbourhoods that enable easier access to local services, reducing the need to travel by car. The LTP4 sets out an ambitious roadmap for a transport network in Surrey that meets the needs of the future. Crucially this includes proposals to help tackle the climate emergency and become a carbon free county by 2050.

Surrey Transport Plan: Congestion Strategy (2014)

- 5.24. The Congestion Strategy, one of the strategies of the STP, sets out the overall approach to tackling congestion. The aim of the strategy is to improve the reliability of journeys, reduce delays at congestion hotspots and improve the provision of journey planning information for travel in Surrey.

Surrey Heath Local Transport Strategy

- 5.25. Surrey County Council is the lead authority on delivering and maintaining transport infrastructure in Surrey Heath. This infrastructure includes roads, public transport, cycle ways and footpaths. The County Council produced a Local Transport Strategy for Surrey Heath (2015), as part of the wider Surrey Transport Plan.
- 5.26. The Surrey Heath Infrastructure Needs Assessment 2017, identifies some of the current issues with regards to transport infrastructure. For the highway network, this identifies areas of congestion and for rail, it identifies that due to the lack of direct services to London Waterloo, patronage is low.



- 5.27. Bus services are concentrated in the West of the Borough around Camberley and Frimley with limited services provided in the East of the Borough. The public rights of way network between settlements is largely used for leisure uses and the Needs Assessment identifies that in the urban areas, improvements could be made to better connect cycle routes and increase dedicated provision. Improving cycle routes is also an issue in rural areas.
- 5.28. In 2017 works to upgrade the M3 between junction 4a for Farnborough and Junction 2 for the M25 were completed adding an extra lane in both directions. A range of improvement measures within and around Camberley town centre including to the Meadows Gyratory have improved congestion and bus and cycle access to Camberley and public realm improvements carried out in Camberley town centre have improved the environment for users. The Surrey Heath Forward Programme (2018)¹⁰³ identifies a programme of transport infrastructure improvements. This has informed the Surrey Heath Infrastructure Delivery Plan (IDP), which as a 'live' document will be updated as necessary. The Council has also commissioned a Transport Assessment to inform the next stage of the Local Plan and the IDP.
- 5.29. The Council's adopted Infrastructure Delivery SPD (2014) sets out the approach to funding and securing infrastructure. The Council and Surrey County Council have been successful in securing matched funding for major schemes from Enterprise M3 Local Enterprise Partnership. Successful examples of the Council enabling infrastructure improvement funding through joint working include: The Meadows Gyratory improvements and confirmation of funding for the A30 Camberley Town Centre Highway Improvements and Camberley High Street Public Realm Improvements.

Developer requirements

- 5.30. The Council will continue to work with partners including Surrey County Council (the Highways Authority), rail and bus operators and the Enterprise M3 Local Enterprise Partnership to bring about transport infrastructure improvements. However, it is the role of developers to ensure that they appropriately mitigate the impacts of their development proposal on transport infrastructure including the highway network and the delivery of sustainable forms of travel. New developments must integrate into existing movement networks and provide safe and suitable access to the road network. Within a site, the layout must be designed such that it gives priority to active and sustainable modes of travel and minimises conflicts between vehicular traffic and cyclists and pedestrians.

¹⁰³ Available online at: www.surreycc.gov.uk/_data/assets/pdf_file/0009/185175/Surrey-Heath-Forward-Programme-2018.pdf.



- 5.31. Development proposals will need to demonstrate that they will not have a severe residual impact on the operation of, safety of, or accessibility to the local or strategic road networks. This should be achieved by demonstrating how they will mitigate the impacts from the development itself and/or its cumulative effects. Measures designed to encourage people to make sustainable travel choices can assist with reducing these impacts.
- 5.32. New developments should demonstrate how they provide the opportunity to maximise the use of the sustainable transport modes of walking, cycling and the use of public and community transport, and opportunities for people with disabilities to access all modes of transport.
- 5.33. The provision and design of vehicle and cycle parking, and the provision of electric charging points will be expected in line with the Councils latest adopted standards. Surrey County Council has produced guidance relating to the thresholds for transport assessments and travel plans as well as additional information as to how these should be produced¹⁰⁴.
- 5.34. The Council wants to embrace new technology relating to transport across Surrey Heath starting with our urban centres. Provision for electric vehicle charging, intelligent parking systems, car clubs and wayfinding would enable the Council to prepare for the changing future of transport and increasing expectations from our residents and businesses. The provision of Car Clubs will be supported as a means of allowing individuals access to a car without the need for direct ownership. Surrey County Council has produced guidance on when car clubs are most likely to be acceptable and the details of the obligations that will be required from developers in implementing a car club¹⁰⁵. Car clubs will be considered on a case by case basis in partnership with Surrey County Council.

¹⁰⁴ Available online at: https://www.surreycc.gov.uk/_data/assets/pdf_file/0008/192635/TP-Good-Practice-Guide-July18.pdf.

¹⁰⁵ Available online at: <https://mycouncil.surreycc.gov.uk/documents/s50095/Annex%20C.%20Draft%20Guidance%20on%20Car%20Clubs%20in%20new%20developments.pdf>.



Policy IN3: Digital Infrastructure and Telecommunications

- 5.35. A high quality digital connection has the ability to support improved economic activity and quality of life. Within Surrey Heath, broadband connectivity is relatively good compared to the national and Surrey averages and is recognised as one of the Borough's strengths in the Surrey Heath Economic Development Strategy¹⁰⁶.
- 5.36. Over the plan period, the use and demand of digital connections in homes and businesses will continue to grow. It is therefore important that new developments must be 'future-proofed' with appropriate digital infrastructure that will meet existing and future communication needs. It is essential that the Council works with developers to make sure that the appropriate digital infrastructure is incorporated, including 4G and 5G networks (or future technologies as they become available).

Policy IN3: Digital Infrastructure and Telecommunications

- 1) Proposals for major residential development (10 or more net new dwellings) and employment generating development (1,000sqm or more) will be supported where it is demonstrated through a Site Connectivity Plan that they are provided with up to date communications infrastructure. This should be through provision of Fibre to the Premises unless demonstrable reasons why this is not feasible are provided, or alternative technologies are available.
- 2) Planning permission for telecommunications development will be permitted where it can be demonstrated that:
 - a) the proposal does not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation that is operated in the national interest; and
 - b) pre-application consultation has been undertaken with local groups and organisations which may be affected; and
 - c) evidence is provided to demonstrate that there is no reasonable possibility of sharing existing facilities in the locality (either in terms of antennae, buildings or sites); and
 - d) applications for an addition to an existing mast or base station are accompanied by a statement that self-certifies that the cumulative exposure, when operational, will not exceed guidelines set by the International Commission on Non-Ionizing Radiation Protection (ICNIRP); and

¹⁰⁶ Surrey Heath Economic Development Strategy 2018 Update
https://www.surreyheath.gov.uk/sites/default/files/documents/business/economic-development/surreyheathedsupdate2018_0.pdf



- e) applications for a new mast or base station are accompanied by evidence that the applicant has explored the possibility of erecting aerials on an existing building, site, mast or other structure and a statement that self-certifies, when operational, that ICNIRP guidelines will be met.

Reasoned Justification

National Context

- 5.37. Nationally, the Government is committed to providing world class digital connectivity and has committed to providing 15 million premises with full fibre by 2025 and nationwide gigabit capable networks¹⁰⁷ by 2033¹⁰⁸. Government policy on delivering improved connectivity, and broadband technology is changing rapidly with the Government considering policy interventions to ensure that all new build residential developments are built with full fibre digital connections in order to deliver the targets set out above¹⁰⁹.
- 5.38. The NPPF (2021) advises that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments.

Surrey Heath

- 5.39. The Borough's Economic Development Strategy identifies one of its aims is to work with Broadband providers and property developers to ensure new developments are future proofed with Fibre to the Premises (FTTP) broadband.

¹⁰⁷ Expected connection to be capable of achieving 1,000 Mbps download speeds.

¹⁰⁸ Future Telecoms Infrastructure Review, July 2018

¹⁰⁹ New Build Developments: Delivering gigabit-capable connections, consultation February 2021, <https://www.gov.uk/government/consultations/new-build-developments-consultation-delivering-gigabit-capable-connections#:~:text=Consultation%20description&text=Today%2C%2065%25%20of%20premises%20can,fast%2C%20reliable%20and%20resilient%20broadband.>



- 5.40. In order to improve quality of life, support and facilitate home working, support local businesses and enable access to digital services, the Council will seek to ensure that major developments comprising new homes and/or employment generating development are provided with the most up to date digital connections unless for technical or viability reasons it can be demonstrated that this is not achievable. Such evidence could include (but is not limited to) issues of viability, the ability to dig the appropriate physical trench and proximity to the nearest breakout point on the fibre network. There may also be circumstances where the operators themselves have concluded that servicing the site is not practical.
- 5.41. As FTTP is normally delivered via underground ducts, the most opportune time for it to be made available to new build sites is when other utilities are being delivered. Development proposals will need to demonstrate that connections to full fibre broadband through FTTP have been planned for as part of the development proposals through the submission of a 'Site Connectivity Plan' alongside any planning application. The Site Connectivity Plan should outline how the developer has considered facilitating FTTP in their development, including discussions they have had with broadband and network providers before submitting a planning application. The Plan should include:
1. Details of engagement with broadband and network providers, including names of providers contacted, dates of contact, and summary of feedback received;
 2. The current connectivity options for the site and achievable internet speeds;
 3. The potential connectivity options for the development and potential achievable internet speeds;
 4. The proposed method of ensuring FTTP to the site, including measures to ensure that the development is 'high speed ready' in cases where it is proven to be unfeasible or disproportionately costly to provide FTTP at the time of the development.
- 5.42. The Council will consider setting out further detail as to how the requirements of this Policy can be met in a Supplementary Planning Document.
- 5.43. As well as the social and economic benefits, adopting this approach will prevent the need for fibre retrofitting programmes in the future which has significant cost implications, causes disruption and can result in a less effective solution when compared to new fibre networks being delivered alongside development.



New telecommunications equipment

- 5.44. Where there is a need for new telecommunications equipment such as masts and base stations, and planning permission is required, applicants will be expected to demonstrate that these are necessary, subject to consultation where appropriate and are sympathetically designed and located in line with national policy¹¹⁰.
- 5.45. This includes the need to evidence that the proposal does not cause interference with other electrical equipment, air traffic services or instrumentation that is operated in the national interest. Such evidence could include relevant pre-application engagement by applicants.
- 5.46. In order to minimise the impact of new equipment, all opportunities should be taken to share existing facilities and applicants will be expected to demonstrate this has been explored. In line with national policy, evidence of consultation with local organisations will be required including where a mast is to be installed near a school or college, or within a statutory safeguarding zone surrounding an aerodrome or technical site.

Policy IN4: Community Facilities

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

Policy IN4: Community Facilities

- 1) Development proposals for the provision of new or improved community facilities will be supported. Proposals should demonstrate that they have explored opportunities for the new facility to be multifunctional.
- 2) Development proposals resulting in the loss of existing community facilities will not be permitted unless:
 - a) evidenced adequate alternative provision already exists in the locality, or the loss would be replaced by an equivalent or better facility in a suitable and accessible location; or
 - b) a robust assessment has been carried out that demonstrates that:
 - i. there is no need for the facility or demand for another community use on site; and
 - ii. it would no longer be economically viable, feasible or practicable

¹¹⁰ Paragraphs 116 and 117 of the National Planning Policy Framework 2021.



- to retain the building or site for its existing use; and
- iii. all reasonable efforts have been made to retain the facility, including evidence to confirm that the property or site has been actively and positively marketed for a meaningful period with reasonable commercial terms and that there is no realistic interest in its retention as a community use.
- 3) If a community facility is listed as an Asset of Community Value this will be a material planning consideration.

Reasoned Justification

- 5.48. National Planning Policy sets out that to support sustainable communities, planning policies should promote social interaction and enable and support healthy lifestyles. This will include the provision of community facilities, and the protection of valued facilities and services particularly where this would reduce the community's ability to meet its day to day needs.
- 5.49. Community facilities across the Borough comprise a range of social, recreational and cultural facilities and services, including facilities such as community centres and village halls, public houses, libraries, education facilities, healthcare facilities, places of worship, and cultural facilities including theatres and arts centres.
- 5.50. The Surrey Heath Infrastructure Needs Assessment, 2017 sets out the existing provision of community facilities across the Borough. This identifies that some facilities are at, or close to capacity, for example primary schools and GP surgeries whilst other facilities are currently sufficient to meet demand, for example community centres.
- 5.51. The loss of retail uses within defined town, district, local and neighbourhood areas is dealt with under other Policies in this Plan. This policy deals with those retail facilities outside of those defined areas.
- 5.52. To ensure an adequate provision of community facilities, applications involving the loss of community facilities will be expected to be supported by evidence that the facility is no longer needed or viable. This evidence will depend on whether the facility is a commercial entity such as a shop or public house, or non-commercial such as a school facility.
- 5.53. All proposals resulting in the loss of a community facility should be supported by evidence of consulting with an appropriate range of community groups and service providers to demonstrate that there is no demand for the facility for the current or an alternative community use and justification as to why there is no reasonable prospect of it continuing in a community use.



- 5.54. For commercial community uses, including for the loss of public houses or retail premises outside defined retail areas outlined above, proposals must be supported by evidence that robust and realistic marketing has taken place, which should be demonstrated by:
- a) Confirmation by a commercial property agent that the premises were marketed for the current use at a reasonable price in relation to the use, condition, quality and location of floorspace and for a minimum of 12 months prior to the submission of the application;
 - b) Evidence of visible marketing and of enquiries received and how they were followed up;
 - c) Reasons why any enquiries were unsuccessful; and,
 - d) A copy of all advertisements.
- 5.55. In determining applications, the Council will view facilities listed as Assets of Community Value¹¹¹ as evidence of local importance and will treat this as a material consideration in determining applications.
- 5.56. New facilities should be well located for the community that it will serve. Wherever possible facilities should be multifunctional to maximise their benefit to the community. New community facilities may need to be phased alongside new development in accordance with Policy IN1: Infrastructure.

Policy IN5: Green Infrastructure

- 5.57. Green infrastructure is a strategic, multi-functional network of green spaces and routes, landscapes, biodiversity and heritage. It includes country parks, wildlife habitats, rights of way, bridleways, commons, heathlands and greens, waterways and bodies of water and historic landscapes and monuments. Green Infrastructure relates to both urban and rural areas and includes both land that can be open to the public and areas that are not accessible. The term Green Infrastructure refers to both blue and green infrastructure.
- 5.58. Green infrastructure delivers improvements to physical and mental well-being, environmental benefits through improvements to biodiversity, landscape, climate change and flood risk, and economic benefits through the delivery of high quality places.

¹¹¹ The list of Assets of Community Value can be viewed at:
https://www.surreyheath.gov.uk/sites/default/files/documents/council/List%20of%20Assets%20of%20Community%20Value%20-%20Table_0.pdf



Policy IN5: Green Infrastructure

- 1) The Council, in partnership with other organisations, will plan for a network of accessible and integrated green infrastructure across the Borough and linked to adjoining areas. The Council will seek to strengthen the role of the green infrastructure network.
- 2) The Council will support proposals which:
 - a) reinforce, link, buffer and create new green infrastructure; and
 - b) promote, manage and enhance public enjoyment of green infrastructure.
- 3) Development proposals will not be permitted where they will result in the loss or fragmentation of existing green infrastructure assets/components or compromise the integrity of the green infrastructure network as set out in the Green Infrastructure Strategy, unless replacement provision or suitable alternative provision that is equivalent or better value in terms of quantity, quality and accessibility can be made.
- 4) Any adverse impacts on the green infrastructure network should in the first instance be fully mitigated through the provision or improvement of green infrastructure on-site or where this is not possible, through appropriate off-site compensatory measures.
- 5) Where new infrastructure is provided, suitable arrangements must be put in place for its future management and maintenance.

Reasoned Justification

National Context

- 5.59. The Council recognises the multiple benefits to residents and others in having a strong green infrastructure network. National Planning Policy and Guidance identifies that Plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure setting out appropriate policies for their protection and enhancement.



Surrey Heath

- 5.60. Surrey Heath is fortunate to have a rich and varied landscape which includes a variety of green and blue infrastructure. This includes heathland, greenspaces within the Borough's urban and rural settlements, waterways, and Suitable Alternative Natural Green Space (SANG), which is greenspace put into place to mitigate the impact of residential development on the Thames Basin Heaths Special Protection Area (SPA). Approximately 40% of Surrey Heath is treed, including along the A30 which runs through the Borough. Green infrastructure therefore plays an important part in the character of the Borough.
- 5.61. This Policy links directly to other policies in the Plan relating to specific green infrastructure assets. These include Policy E2 Biodiversity and Geodiversity, which identifies the range of sites in the Borough that have biodiversity importance, Policy IN6 Green Spaces, and Policies SS3a and SS3b Climate Change. In addition to the green infrastructure assets identified elsewhere in the Plan, types of areas that contribute to the green infrastructure network include:
1. Parks and public gardens, including urban parks, country parks and large formal gardens;
 2. Natural and semi-natural urban greenspaces, including woodlands, urban forestry, scrub, grasslands, wetlands, open and running water, wastelands and derelict open land;
 3. Outdoor sports facilities (with natural or artificial surfaces and either publicly or privately owned) – including tennis courts, bowling greens, sports pitches, golf courses, athletics tracks, school and other institutional playing fields, and other outdoor sports areas.
 4. Amenity greenspace (most commonly but not exclusively in housing areas) – including informal recreation spaces, green spaces in and around housing, domestic gardens and village greens;
 5. Provision for children and teenagers, including play areas, skateboard parks, outdoor basketball hoops, and other more informal areas;
 6. Allotments and community gardens;
 7. Cemeteries and churchyards;
 8. Accessible countryside in urban fringe areas;
 9. Green corridors including the Blackwater Valley and Basingstoke Canal, rail corridors and major highway corridors such as the A30.
- 5.62. The Council will produce a Climate Change and Green Infrastructure SPD to deliver a Green Infrastructure Strategy to support this Policy. This will be informed by existing Local Plan evidence including the Surrey Heath Infrastructure Needs Assessment 2017, the Open Space Assessment and Playing Pitch Strategy 2016, and the Greenspace Background Paper. As set out in Policy E2 the Council will work with the Surrey Nature Partnership, local communities and other partners in preparing this Strategy.



- 5.63. Development must avoid the loss, fragmentation, severance or other significant impacts on the functioning of the green infrastructure network. At an early stage in the planning process, developments should assess how green infrastructure can be incorporated as part of the overall design solution or masterplan, protecting and enhancing any existing green infrastructure assets on site and designing-in new green infrastructure. Consideration should be given to how green infrastructure can be utilised to deliver climate change mitigation and adaptation. Where public new green infrastructure is provided such as allotments or open space, arrangements for long term maintenance should be identified which may include a financial payment secured through a planning obligation.
- 5.64. The provision of green infrastructure on site such as amenity greenspace, tree planting or play areas can more easily be incorporated in larger developments but applicants for smaller schemes are encouraged to consider how green infrastructure can be incorporated into their developments (for example, green roofs, landscaping, gardens and amenity space). Applicants are encouraged to incorporate and entwine biodiversity improvements into green infrastructure, including rewilding.
- 5.65. Any additional pressures on the green infrastructure network arising from new development must be fully mitigated. This will normally be addressed through the on-site provision of green infrastructure, or if this is not feasible, for example on smaller sites, through off-site measures such as off-site biodiversity improvements, tree planting or upgrading of local green infrastructure facilities.



Policy IN6: Green Space

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

Policy IN6: Green Space

- 1) Green spaces, as shown on the Policies Map are allocated for their visual amenity and/or recreational value.
- 2) Development will not be supported on areas designated as green spaces, unless:
 - a) For sites designated for their recreational value:
 - i. an evidenced assessment has been undertaken that clearly and robustly demonstrates re-provision can be made elsewhere of equivalent or better community benefit in terms of quality, quantity and accessibility; or
 - ii. the development is for sports and recreation provision the need for which clearly outweighs the loss of green space; or
 - iii. an assessment has been undertaken, which has clearly shown the open space to be surplus to requirements in meeting need in Surrey Heath over the plan period.
 - b) For sites designated for their visual amenity, it can be clearly demonstrated that the loss will not have a negative impact upon residential amenity and local character, and an element of open space will be incorporated into the development proposal.
- 3) Development proposals that include existing areas of ancillary green open space that are not designated¹¹², but none the less contribute to an areas character, should be assessed in accordance with Green Infrastructure Policy IN5 of this Plan.

¹¹² For example, due to their size.



- 5.68. The NPPF outlines that ‘access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities’.
- 5.69. Surrey Heath contains numerous green spaces within its urban areas, smaller settlements and rural villages, as well as outside settlement areas. The green spaces perform a number of functions, including recreational opportunities and visual breaks, as well as contributing to the physical and visual attractiveness and quality of settlement areas, constituting highly valued assets. As such, they contribute to the health and wellbeing of local communities. Green spaces in Surrey Heath also form an important part of the Borough’s green infrastructure network.
- 5.70. The Green Space Assessment (2021) proposes the designation of green spaces throughout the Borough, both within and outside defined settlement boundaries, amounting to a total of 156 green spaces. The green spaces allocations are informed by the Surrey Heath Green Space Assessment 2021 which details whether a site has been proposed for designation for its visual amenity value and/or recreational value.
- 5.71. The Surrey Heath Open Space Assessment (2016) outlines the quantity of different types of open space provision in the Borough. One of the conclusions of the Study was the need to provide improved provision for young people and older people. New development will be expected to meet the open space standards set out in the Open Space Strategy (2016)¹¹³. Development proposals for new open space should include natural and semi-natural features and consider opportunities to provide additional play provision and allotments. Where open space or other facilities are provided on site they should be well located and designed with appropriate management arrangements in place.
- I. For Areas of Play, the following standards are expected¹¹⁴:
- a) Local area of play (LAP) – minimum of 0.01ha per 1,000 population.
 - b) Local Equipped Area for Play (LEAP) – minimum of 0.04ha per 1,000 population.
 - c) Neighbourhood Equipped Area of Play (NEAP) – minimum of 0.1ha per 1,000 population.

¹¹³ Or any subsequent strategy update.

¹¹⁴ Or as updated any subsequent update of the Surrey Heath Open Space Assessment.



- 5.72. Outdoor playing fields provide an important element of the overall provision of open space, sports and recreational facilities across the Borough, providing the community with formal and informal active participation in sports. The Surrey Heath Playing Pitch Strategy (2016) considers the provision of playing pitches in the Borough. The study identified shortfalls in some areas of provision, including a current shortfall of youth 11v11 and 9v9 football pitches and a future shortfall across each pitch type, as well as an overall shortfall of senior rugby pitches based on current and future demand.
- 5.73. The study supports the need to protect the existing provision of playing pitches across the Borough to meet current and likely future demand. The assessment identified that there should be flexibility in the use of play pitches to reflect how they are used. In meeting future requirements brought about by new development, regard will need to be given to providing more multi-use facilities and play equipment which meets the needs of all users, from young children through to the elderly. Such multi-use facilities should be accessible to all users. Re-use and improvements of existing facilities may help meet future requirements.
- 5.74. The study provides an 'Action Plan' which will be reviewed at regular intervals with relevant partners. It provides recommendations based on current levels of usage, quality and future demand, as well as the potential of each site for enhancement.
- 5.75. The Council will protect recreational uses through resisting the loss of existing outdoor recreational facilities, unless equivalent or better replacement facilities are proposed. In addition to ensuring the protection of sites, new development will need to ensure that any additional pressure it will place on playing pitches is appropriately mitigated. This will be through on-site provision secured through S106 for larger sites, or through developer contributions via CIL.



Policy IN7: Indoor and Built Sports and Recreational facilities

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

Policy IN7: Indoor and Built Sports and Recreational facilities

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

Reasoned Justification

- 5.77. Indoor and built sport and recreational facilities play an important role in promoting healthy lifestyles and encouraging physical activity. The Council commissioned an Open Space, Playing Pitch and Indoor Sports Facilities Assessment and Strategy (2016) which examined indoor sports provision within Surrey Heath, including quantity, quality and accessibility assessments. The study recommended that existing provision in the Borough should be protected and enhanced.
- 5.78. To demonstrate indoor and built sport and recreational facilities are no longer viable, the Council will require the submission of full financial evidence in the form of a commercial viability study. The evidence should clearly set out how retention of the facilities has been fully explored. This should include realistic, appropriate and genuine marketing of the facilities for its existing use and alternative sport and recreational use for a period of at least 12 months prior to the submission of a planning application. Robust evidence will also be required to demonstrate that there is no longer a need for the existing facilities or an alternative indoor and built sport recreational use.
- 5.79. In July 2021 the new Places Leisure Camberley opened replacing the former Arena Leisure Centre and providing modern enhanced indoor sports and recreational facilities.



Policy IN8: Safeguarded Land for Future Transport Provision

- 5.80. The following proposal to safeguard land as shown on the Policies Map provides a continued opportunity to protect the site for potential re-use for rail transport to improve journey times and accessibility between Camberley and London Waterloo.

Policy IN8: Safeguarded Land For Future Public Transport Provision

- 1) The Borough Council and the County Council will safeguard land at the Sturt Road “chord”, Frimley Green, as shown on the Policies Map, to ensure that inappropriate development does not prejudice its future re-use for rail transport.

Reasoned Justification

- 5.81. Land at Sturt Road contains a disused rail “chord” on a largely intact embankment which, when last used by trains, linked the main line to London Waterloo with Frimley, Camberley and Bagshot. It’s protection retains the opportunity to achieve a direct and attractive rail access from local stations to London. The ability to programme direct services linking Bagshot, Camberley and Frimley to Waterloo would improve travelling time to and from London and make the service more attractive to commuters. This new Local Plan is proposing the allocation of a significant amount of new residential development in Camberley town centre and this further supports the future provision of improved services.
- 5.82. One of the strategic objectives of the New Rail Strategy for Surrey¹¹⁵, 2021 is to encourage modal shift. This is reflected in the emerging Surrey LTP4 as well as Surrey Heaths Climate Change Strategy and Action Plan. A further Objective of the Rail Strategy is ‘Connectivity to external drivers of Growth’ – ensuring that Surrey is connected to national and international markets through connections to Central London and key transport nodes such as key mainline and HS2 stations, and Heathrow and Gatwick airports. The Sturt Road Chord is identified on the Rail Strategy’s long list of network infrastructure improvements.

¹¹⁵ Available online at: <https://mycouncil.surreycc.gov.uk/documents/s77545/Annex%20I-%20New%20Rail%20Strategy%20for%20Surrey.pdf>.



- 5.83. A number of possible ways of providing direct rail services between local stations and London have been identified, including the re-opening of the Sturt Road chord. These were assessed through feasibility¹¹⁶ work in 2016. This identified that a significant increase in additional passengers would be required to make a positive business case and identified some technical issues to be overcome. Nevertheless, the increasing wider policy emphasis on measures designed to change the way people travel and the need to reduce carbon emissions suggest that it is important to retain the longer-term opportunity to improve rail links in this location.
- 5.84. The Borough Council therefore continues to safeguard this land and it is reserved as a future rail link.

¹¹⁶ Available online at: https://www.surreycc.gov.uk/__data/assets/pdf_file/0006/136554/Camberley-Rail-Assessment-Report.compressed.pdf.



6. Section 6: Environment

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

Policy EI: Thames Basin Heaths Special Protection Area

Policy EI: Thames Basin Heaths Special Protection Area

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



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

Reasoned Justification

- 6.3. The South East Plan was published in May 2009. Whilst the majority of the plan was revoked in March 2013, policy NRM6 relating to the Thames Basin Heaths Special Protection Area remains in place and is relevant to development in the Borough. The approach taken in Policy EI is consistent with policy NRM6 of the South East Plan¹¹⁷.
- 6.4. Due to the large number of local authorities involved and the cumulative nature of the impacts (as a result of many individual housing applications) a co-ordinated approach to avoidance measures has been necessary and the Thames Basin Heaths Joint Strategic Partnership Board (JSPB) has been set up to provide the vehicle for joint working between local authorities and other organisations responsible for protection of the Thames Basin Heaths SPA. The JSPB includes Member representation for each affected Local Authority together with a number of stakeholders.
- 6.5. In February 2009 the JSPB endorsed a strategic Delivery Framework. This recommends a combination of three avoidance measures to protect the Thames Basin Heaths from the impacts of new residential development:
 1. The establishment of a 400 metre buffer around the SPA within which no net new residential development will be permitted.
 2. The provision of Suitable Alternative Natural Greenspace (SANG).
 3. Strategic Access Management and Monitoring (SAMM) measures, coordinated visitor management across the whole of the publicly accessible SPA.

¹¹⁷ The South East Plan can be viewed on the National Archives website.



- 6.6. The Thames Basin Heaths Special Protection Area Avoidance Strategy Supplementary Planning Document 2019 sets out in detail the approach that Surrey Heath Borough Council will take to avoiding harm to the Special Protection Area as a result of new housing. This includes details of the types of development affected, guidelines for the creation of SANG and guidance on SANG and SAMM contributions.
- 6.7. The Thames Basin Heaths SPA Avoidance Strategy SPD (2019) sets out that for development proposals with a net increase of 10 or more residential units, the site is required to be within the SANG catchment that capacity will be allocated to. For development proposals with an increase of 136 or more, net residential units will generally be expected to provide bespoke SANG solutions. In addition, larger developments in the Western Urban Area¹¹⁸, that are unable to realistically provide land for SANGs may also be able to use capacity at strategic SANGs. This approach may also apply to sites outside this area that have particular, site specific circumstances which support the need for off-site SANGs provision, subject to the availability of SANG capacity.
- 6.8. Proposals for other forms of development either where the use is quasi-residential or by virtue of proximity to the SPA, for example in the 400m buffer zone, will be required to contribute toward avoidance measures and will be subject to an Appropriate Assessment.
- 6.9. The Council's Thames Basin Heaths Special Protection Area Topic Paper sets out the Council's approach to the provision of SANG for the Plan period, including an assessment of sites with potential to mitigate future residential development in the Borough.
- 6.10. The Council will support investigations into alternative methods of mitigation. Where further robust evidence demonstrates that the integrity of the SPA can be protected using alternative mitigation measures, or changes to existing strategies, such measures would need to be scientifically sound and agreed with the JSPB and Natural England.
- 6.11. Under Article 6(3) of the Habitats Directive, Competent Authorities have a duty to ensure that all the activities they regulate have no adverse effect on the integrity of any of the Natura 2000 sites. The Competent Authority, in this case Surrey Heath Borough Council, must assess the possible effects of a plan or project on any Natura 2000 sites through a Habitats Regulations Assessment. A European Court of Justice judgement¹¹⁹ in April 2018 established the legal principle that a full Appropriate Assessment (AA) must be carried out for all planning applications involving a net gain in residential units in areas affected by the Thames Basin Heaths SPA, and that a Habitats Regulations Screening Assessment cannot take into account any proposed measures to mitigate any likely impact at the screening stage. The Council is therefore required to carry out a full Appropriate Assessment of relevant plans and planning applications.

¹¹⁸ The Western Urban Area comprises the settlement areas of Camberley, Frimley, Frimley Green and Mytchett.

¹¹⁹ People Over Wind, Peter Sweetman v Coillte Teoranta C-323/17.



Policy E2 Biodiversity and Geodiversity

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

Policy E2: Biodiversity and Geodiversity

- 1) Development proposal will be permitted where they will not have an adverse impact on biodiversity and/or geodiversity. Where harm or loss cannot be avoided, mitigation will be required such that it can be robustly demonstrate that:
 - a) there will be no adverse effect on the integrity of international, national and local designated sites;
 - b) there will be no adverse impact on the conservation status of priority species;
 - c) there will be no loss or deterioration of a priority habitat type, and/or irreplaceable habitat;
 - d) there will be no adverse impact on the conservation objectives of Biodiversity Opportunity Areas; and
 - e) there will be no adverse effect on the integrity of linkages between designated sites and priority habitats.
- 2) The weight attributed to the protection of nature conservation interests will be commensurate to their status and significance¹²⁰, and any other designation applying to the site, habitat or species concerned. For proposals that affect nationally protected sites, very special circumstances would be required to robustly demonstrate that the benefits of the development proposal clearly outweigh the loss or harm and that appropriate compensation will be sought.
- 3) Effective avoidance, mitigation and compensation will be secured through the

¹²⁰ As set out in paragraph 6.16.



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

- 4) Development proposals, where appropriate, will need to take full account of the impact on soils. Development will be expected to avoid the best and most versatile agricultural land. Areas of lower quality agricultural land should be used for development in preference to the best and most versatile agricultural land.

Reasoned Justification

National context

- 6.14. The Environment Act 2021 sets out how the UK government plans to protect and improve the natural environment in the UK. The Environment Act recognises the accelerating impact of climate change in the UK and the associated impacts of damage to nature with species loss, habitat erosion and the disappearance of cherished wildlife.
- 6.15. The NPPF requires Local Plans to set out a strategic approach to planning for the creation, protection, enhancement, and management of networks of biodiversity and to plan for biodiversity at a landscape scale across local authority boundaries. Local planning authorities are advised to set criteria-based policies against which proposals for any development, on or affecting protected wildlife or geodiversity sites, will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.

Surrey Heath

- 6.16. The weight to be attributed to the protection of nature conservation interest will be commensurate to their significance. The Council will apply a hierarchical approach to the conservation of designated sites within the Borough as follows:
 1. International Sites: Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites, or candidate/formally proposed versions of these designations.
 2. National Sites: Sites of Special Scientific Interest (SSSI) and National Nature Reserves.



3. Irreplaceable Habitats: habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity, such as ancient woodland, ancient and veteran trees¹²¹.
 4. Local Sites: Sites of Nature Conservation Importance (SNCI), Local Nature Reserves, Local Geological Sites and Regionally Important Geological Sites (RIGS).
- 6.17. The heathland in Surrey Heath is a defining characteristic of the Borough and the setting of settlements within the Borough. Within and surrounding the Borough are large areas of international ecological importance, including SPAs and SACs. The Thames Basin Heaths Special Protection Area (SPA) and Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC) mostly coincide with one another within Surrey Heath.
- 6.18. Within the Borough there are also a number of SSSIs and a National Nature Reserve (NNR), which relate to legislation from The Wildlife & Countryside Act 1981 (as amended). The SSSIs in Surrey Heath are:
1. Broadmoor to Bagshot Woods and Heaths.
 2. Chobham Common (also an NNR).
 3. Colony Bog and Bagshot Heath.
 4. Ash to Brookwood Heaths.
 5. Basingstoke Canal.
- 6.19. There are a number of SNCI's in the Borough, which are designated by the Council working within the Surrey Local Sites Partnership, integrated into the Surrey Nature Partnership (SyNP). These areas are important both in their own right and as part of an ecological network of sites across and beyond the Borough, which also incorporates a number of wildlife corridors.
- 6.20. The SyNP is the recognised Local Nature Partnership for Surrey. The SyNP is working with local authorities in Surrey to set out an approach to conserving and enhancing the biodiversity of the county at a landscape scale, which may also be viewed as the investment needed to maintain our environment when presented as 'natural capital'. This approach identifies Biodiversity Opportunity Areas (BOAs); areas where there are concentrations of recognised sites of biodiversity importance, both statutory and non-statutory. BOAs represent areas where improved habitat management and efforts to restore and re-create priority habitats will be most effective in improving connectivity and reducing habitat fragmentation.

¹²¹ Further guidance is provided by the Surrey Nature Partnership at https://surreynaturepartnership.files.wordpress.com/2020/08/irreplaceable-habitats-guidance-for-surrey_final_aug2020.pdf.



- 6.21. BOAs extend across local authority boundaries and therefore provide the strategic approach that addresses biodiversity at the landscape scale as required by the NPPF. The area within Surrey Heath that falls within BOAs mainly relates to the Thames Basin Heaths, as well as the Blackwater and Bourne river corridors. Where proposals fall within or adjacent to a Biodiversity Opportunity Area, their required measurable biodiversity net gain enhancements (see Policy E3) should support the BOA's objectives, including those set out in the SyNP BOA¹²² Policy Statements. Alternative measures may be acceptable where it is clearly demonstrated that these are more appropriate, given the site specific circumstances of the proposal.
- 6.22. The Council supports the emerging strategy for Surrey being led by the SyNP and will set out how the approach will be implemented in the Borough through a Climate Change and Green Infrastructure SPD once enough detail has emerged. The Council will work with the SyNP and partners to bring forward opportunities to conserve and enhance the natural assets of Surrey Heath, both green and blue (freshwater) natural assets including the River Blackwater, Basingstoke Canal and the Bourne River and Tributaries.

Soils

- 6.23. Soils are a finite, multi-functional resource which underpin the wellbeing and prosperity of communities. To ensure that development proposals do not impact on this valuable resource, development proposals should take full account of their impact on soils, their intrinsic character and the many ecosystem services they deliver. The Council will seek to safeguard the long term capability of the best and most versatile agricultural land, in accordance with national guidance¹²³.

¹²² Available at https://surreynaturepartnership.files.wordpress.com/2014/11/biodiversity-opportunity-areas_surrey-nature-partnership_20151.pdf.

¹²³ The NPPF defines the best and most versatile agricultural land as land in grades 1, 2 and 3a of the Agricultural Land Classification.



Policy E3: Biodiversity Net Gain

- 6.24. The Government confirmed in March 2019 that delivering biodiversity net gain will be a requirement for all development proposals. Biodiversity net gain can be defined as development that leaves biodiversity in a measurably better state than before, and an approach where developers work with local governments, wildlife groups, landowners and other stakeholders in order to support their priorities for nature conservation. This means protecting existing habitats and ensuring that lost or degraded environmental features are compensated by restoring or creating environmental features that are of greater value to wildlife and people.
- 6.25. The Council recognises the opportunities to encourage biodiversity that can be provided through the development of sites. These include providing, retaining and enhancing wildlife corridors and incorporating opportunities within construction methods, such as swift bricks, bee bricks and green roofs, and the provision of suitable appropriate native species in landscaping. Biodiversity is not confined to designated sites and every development has the potential to contribute towards the conservation of locally important habitats and species.

Policy E3: Biodiversity Net Gain

- 1) Development proposals will be permitted provided that they can demonstrate the provision of a minimum 20% increase in biodiversity units when set against the baseline biodiversity value and are in accordance with national guidance. This may include the creation, restoration, enhancement and subsequent maintenance of habitats and features. In cases where requisite/required/adequate on-site net gain provision is demonstrated not to be achievable, off site provision should be provided.
- 2) Development proposals should seek to similarly provide environmental net gain, in accordance with national guidance. Development proposals will be expected to provide suitable ecological survey information and assessment to establish biodiversity net gains and the extent of any potential impact on ecological features.

Reasoned Justification

- 6.26. The NPPF makes clear that planning policies should contribute to and enhance the natural environment by minimising impacts on and providing net gains for biodiversity. The NPPF also states that planning policies should identify and pursue opportunities for securing measurable net gains for biodiversity.



- 6.27. Biodiversity net gain should be integrated into the design of a site through the provision of new wildlife habitats, but may also include off-site biodiversity enhancement of green networks and certain measures to benefit priority species on building structures. Where the adverse impacts of development on biodiversity are identified, they must be proportionately addressed in accordance with the mitigation hierarchy of:
1. Avoidance
 2. Mitigation; and
 3. Compensation
- 6.28. The Surrey Nature Partnership recommends that Surrey’s local planning authorities adopt a policy for a minimum 20% increase in biodiversity units for planning applications¹²⁴. Development proposals in Surrey Heath will be required to deliver a minimum net gain of 20% biodiversity units and will be expected to use the appropriate DEFRA Biodiversity Metric 2.0 (or as subsequently amended), to calculate and demonstrate net gains.
- 6.29. Biodiversity net gain should be additional to any habitat creation required to mitigate or compensate for impacts of new development and should be delivered even if there are no losses through development. Biodiversity net gain should not be applied to irreplaceable habitats and should be dealt with separately to any mitigation and/or compensation requirements for European sites¹²⁵.
- 6.30. In the first instance, net gain should be delivered on-site. Where this is demonstrated as not achievable, net gain will need to be delivered off site through an appropriate contribution, either to be realised as a bespoke ‘off-set’ project or by buying credits from a ‘habitat bank’. Delivering biodiversity net gain will ensure that new development enhances the environment, contributes to our ecological networks and conserves our precious landscapes. Successful implementation of biodiversity net gain will restore and create high-quality habitats that can provide a home for a diverse range of species and build resilience to climate change. Further guidance for the delivery of biodiversity net gain will be set out in a Climate Change and Green Infrastructure SPD.
- 6.31. The delivery of enhancements to biodiversity in and around new developments should be informed by an understanding of the local ecological network and should seek to include habitat restoration, re-creation and expansion, improving links between designated sites, buffering of existing designated sites, delivery of new biodiversity features within development, and securing management for long-term enhancement.

¹²⁴ Further information available at https://surreynaturepartnership.files.wordpress.com/2020/11/recommendation-for-20-bng-in-surrey_snp-november2020_final.pdf.

¹²⁵ Such as Suitable Alternative Natural Greenspace.



- 6.32. Environmental net gain takes the concept of biodiversity net gain further to include the economic, social and amenity value of natural capital and biodiversity. Development proposals should consider opportunities to include environmental net gain on-site in the first instance, and off site if this is not achievable.

Policy E4: Pollution and Contamination

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

Policy E4: Pollution and Contamination

Pollution

- 1) Development will be permitted provided that:
 - a) it does not give rise to, or would be subject to, unacceptable levels of pollution¹²⁶; and
 - b) it is satisfactorily demonstrated through an assessment that any adverse impacts of pollution¹²⁷ will be adequately mitigated or otherwise minimised to an acceptable level¹²⁸.
- 2) Where development is proposed on or near a site that may be impacted by, or may give rise to, pollution, such a proposal must be supported by an assessment that investigates the risks associated with the site and the possible impacts on the development, its future users and the natural and built environment. The assessment should propose adequate mitigation or remediation when required to achieve a safe and acceptable development. This assessment should be written in line with best practice guidance.

¹²⁶ Pollution refers to anything that affects the quality of land, air, water or soils which might lead to an adverse impact on human health, quality of life, the natural environment or general amenity. It includes noise, vibration, light, air quality, radiation, dust, fumes or gases, odours or other effluvia, harmful substances, or degradation of soil and water resources.

¹²⁷ Including those from the proposed development, including demolition and construction phases, which impact sensitive development or the environment.

¹²⁸ In accordance with recognised national and international standards, guidance and methodologies, or any local authority adopted supplementary guidance.



- 3) Development will only be permitted in an Air Quality Management Area¹²⁹ (AQMA) where it can be demonstrated that it will not have any adverse impacts to human health or lead to a deterioration of air quality within the AQMA.

Land contamination

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

Reasoned Justification

Pollution

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

¹²⁹ The current AQMA in the Borough is the strip of land from Frimley Road Camberley to Ravenswood Roundabout Camberley which embraces the M3 Motorway and the houses on both sides of the motorway which border the highway.



Air quality

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

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

- 6.37. The release of fine particles and harmful gases into the atmosphere can have a significant impact on human health and the environment. The Council's guidance on the planning application validation process sets out when an air quality assessment will be required to take account of the impact of new development on air quality. The Council will encourage the incorporation of technologies and the utilisation of green infrastructure to limit the impact of air pollution.
- 6.38. In 2005 Surrey Heath Borough Council produced an Air Quality Action Plan (AQAP) which included 51 actions¹³⁰, each with a timescale for achievement, associated with the AQMA. The Council produces a status report annually that includes an update on the action plan, and planning applications likely to impact the AQMA should have regard to its contents.
- 6.39. The Council will continue to work with partners to improve air quality in the Borough, including seeking to address high levels of nitrogen oxide deposition along the A331 Blackwater Valley Road which has been identified by DEFRA's national model as being in exceedance of the annual air quality objective for nitrogen dioxide. The Council will also encourage proposals to facilitate increased use of electric vehicles, which can have significant benefits for improving air quality and public health, by working in partnership with Surrey County Council to support the emerging Electric Vehicle Strategy.

¹³⁰ More information is available at <http://aqma.defra.gov.uk/action-plans/SHDC%20AQAP%202007.pdf>.



- 6.40. In considering the amount and location of future development in the Borough, the Council will also need to consider the cumulative impact of air quality and pollutants on Natura 2000 sites, Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) within the Borough. The Habitats Regulation Assessment that supports the next version of the Local Plan will include an air quality assessment which will take into account the location of size of development coming forward over the plan period, informed by the Transport Assessment.

Noise, lighting and odours pollution

- 6.41. Noise from a variety of sources, including road, rail, air, construction, entertainment venues and commercial and industrial activities, have the potential to impact on health and quality of life if not properly controlled or planned for. The adverse effects of excessive exposure to noise (and vibration) are well documented and rightly recognised as a material planning consideration. Noise is a key aspect of quality of life and social well-being, and therefore, by extension, sustainable development.
- 6.42. Development proposals will need to consider the noise impact within and surrounding the development site and demonstrate that any noise impacts comply with the Council's requirements. Consideration should also be given to protecting tranquil areas. New development which will give rise to, or would be subject to, significant adverse effects of noise will not be permitted.
- 6.43. In considering measures to avoid, mitigate and reduce noise impacts, proposals will need to consider the basic principles of noise control:
1. Separate noise sources from sensitive receptors;
 2. Control the noise at source; and
 3. Protect the receptor.
- 6.44. Poorly designed artificial light can lead to glare, sky glow and light spillage which can have an adverse impact on neighbouring residents and wildlife. The Council will seek to limit the impact of artificial lighting by encouraging well-designed lighting schemes and will consider the impact of any lighting scheme on residents, highway users, the character of the area, wildlife, intrinsically dark landscapes and the visibility in the night sky. The Council will only permit proposals that will not adversely affect amenity, the natural environment or public safety.
- 6.45. Odours and fumes from commercial activities, including kitchens can have a detrimental impact on neighbouring residential amenity. Any siting of extractor flues should have regard to potential impact on neighbouring properties and the surrounding environment.



Contaminated Land

- 6.46. Full regard should be given to the Council's Contaminated Land Strategy¹³¹. The Council's Contaminated Land Strategy recognises that serious contaminated land issues in Surrey Heath are likely to be limited because of the relative lack of industrialisation. However, potential sources of contamination in the Borough may include:
1. The presence of the military activities such as waste disposal, gas works and some limited commercial and industrial activities could contribute to the potential for land contamination. Where development of such sites take place, the planning process should help manage any risk to existing and future site uses and site workers.
 2. Although there has been a lack of significant industrialisation, there have been a large number of smaller manufacturing activities, workshops, auto repair workshops.
 3. All brownfield sites have the potential to be contaminated. For example, due the widespread use of asbestos prior to 1999, any brownfield site has the potential to contain asbestos fibres.
 4. Applicants should provide a statement of land quality for development sites which have potential to be impacted by contamination from current or historical activities carried out on, adjacent or near to the site such that remediation may be required. Where contamination is revealed, adequate information, prepared by a competent person, should be made available to inform planning decisions. Applicants are required to submit and implement a scheme of remediation, appropriate to the proposed use, in cases where contaminated land is revealed. After remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990.

¹³¹ More information is available on the Council's website at:
www.surreyheath.gov.uk/residents/environmental-services/noise-nuisance-pollution/contaminated-land.



Policy E5: Renewable and Low Carbon Energy Systems

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

Policy E5: Renewable and Low Carbon Energy and Heating Schemes

- 1) Proposals for stand-alone and community led renewable, low carbon and decentralised sources of energy and heating schemes will be supported¹³² provided that there is no significant harm to local amenity or to the built, historic and natural environments, in accordance with other policies in this Plan.
- 2) Major development¹³³ proposals will be required to submit an energy statement, demonstrating how the following will be applied and implemented in the proposal:
 - a) Supply energy efficiency, and;
 - b) Use of renewable energy.
- 3) Development proposals of more than 20 dwellings and/or non-residential development of over 1,000sqm or more of net additional floorspace will be required to incorporate measures to supply a minimum of 25% of the development's energy needs from renewable and/or low carbon technologies, in accordance with national technical standards, unless it can be clearly demonstrated with evidence that this is not feasible and/or viable for this form of energy provision.

Reasoned Justification

- 6.48. New developments can be a catalyst for decentralised energy network growth and major new developments should assess the feasibility and viability of incorporating measures to supply the developments energy needs from renewable and/or low carbon technologies.
- 6.49. The council will have regard to South 2 East local energy strategy, developed by the EM3 LEP and other South East LEPs, in delivering the Local Plan policy.

¹³² Except for applications relating to repowering of existing wind turbines, a proposed wind energy development involving one or more turbines should not be considered acceptable unless it is in an area identified as suitable for wind energy development in the development plan, in accordance with paragraph 154 of the NPPF.

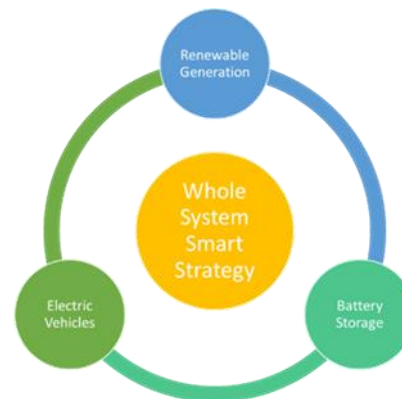
¹³³ Of 10 or more dwellings.



- 6.50. The NPPF includes specific support for community energy schemes, stating that ‘Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning’.
- 6.51. Community energy schemes vary greatly in nature, and in general any impacts of schemes (e.g. visual impacts of solar) are offset by benefits to the local community, including financial returns for those who invest in shares (although the opportunity to invest is typically not limited to the local community) and benefits from profits reinvested locally.
- 6.52. The Surrey Heath Climate Change Study (2020) identifies that a primary climate change mitigation opportunity for the Local Plan is to support low carbon heating and heat networks. The Study notes that support for heat networks, or district heating schemes, should be a prominent spatial planning consideration, taking into account the location of strategic sources of heat and heat demand, support for concentrations of growth that will achieve the requisite density of heat demand and economies of scale, as well as support for mixes of uses in any given area such that there is a relatively smooth heat demand profile (also cooling) over time, and in particular across the day. Camberley town centre represents a major opportunity to deliver low carbon heating and cooling to thousands of residents and many local businesses.
- 6.53. The Council will consider opportunities to define Heat Priority Areas through the Local Plan. Opportunities in Surrey Heath could include Yorktown Industrial Area, Frimley Park Hospital and Camberley Town Centre. Should Heat Priority Areas be identified through the Local Plan, all sufficiently large and/or intensive proposals for development within such areas will be expected to demonstrate that consideration has been given to incorporating heat networks utilising low temperature heat sources/pumps or combined cooling, heating and power (CCHP).
- 6.54. To support a decarbonisation trajectory to net zero by 2050, as set out in Policy SS3a, the Council requires development proposals of more than 20 dwellings and/or non-residential development of over 1,000sqm or more of net additional floorspace to incorporate measures to supply a minimum of 25% of the development’s energy and needs from renewable and/or low carbon technologies.



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



Policy E6: Flood Risk and Sustainable Drainage

- 6.56. The Council will ensure that development in the Borough reduces flood risk and minimises the impact of flooding, seeking to direct development to areas of lowest flood risk. Surrey Heath is subject to flood risk from a variety of sources, the M3 motorway directly discharges through several parish areas and the elevated Chobham ridges can promote rapid run-off from heathland, through natural valleys and built up areas. The Blackwater River is a historic source of flood risk affecting the western areas of the Borough, although flood incidents have reduced since construction of the A331 and associated work undertaken to the river.
- 6.57. The Bourne river catchments can affect the parishes in eastern areas, collecting flows from large expanses of open heathland, through minor watercourse and main-river routes before confluence at the Borough boundary. The Chobham Ridges divide the Borough run-off into two distinct areas, to the west a drop off towards the Blackwater River via Camberley, Deepcut, Frimley, Frimley Green and Mytchett; and a drop to the east drains towards the Bourne rivers affects the parishes of Bagshot, Bisley, Chobham, Lightwater, West End and Windlesham.



Policy E6: Flood Risk and Sustainable Drainage

- 1) Flood zones in Surrey Heath Borough are defined based on the definitions contained within national Planning Practice Guidance (PPG)¹³⁴ and the Council's Strategic Flood Risk Assessment (Level 1)¹³⁵.
- 2) To ensure that development in the Borough reduces flood risk and minimises the impact of flooding, the Council will:
 - a) steer development to the areas with a lower risk of flooding;
 - b) apply the Sequential Test and Exception Test to site selection informed by existing evidence, where applicable; in accordance with the Surrey Heath Strategic Flood Risk Assessment;
 - c) consider all sources of flooding from fluvial, surface water, groundwater, sewers, reservoirs and ordinary watercourses;
 - d) apply the sequential approach to site layout by locating the most vulnerable uses in parts of the site at the lowest risk of flooding;
 - e) assess the cumulative impacts of development on flood risk;
 - f) account for the impacts of future climate change; and
 - g) safeguard the 'undeveloped' flood zone for flood management purposes, with the exception of the provision of essential infrastructure.
- 3) Development in areas at high or medium risk of flooding, as identified in the latest Surrey Heath Strategic Flood Risk Assessment and Environment Agency flood risk maps will be permitted provided it is demonstrated that:
 - a) a site-specific flood risk assessment demonstrates that the development, including access and egress, will be safe for its lifetime. This should take account of climate change, not lead to increased flood risk elsewhere and, where possible, reduce flood risk overall;
 - b) the vulnerability of the proposed use is appropriate for the level of flood risk on the site;
 - c) where required, the proposal passes the exemption test as outlined in the NPPF and national guidance;
 - d) site drainage systems are designed to contain the flood risk of a 1 in 100 year storm event, applying the appropriate allowance for the type of development and;

¹³⁴ Flood risk and coastal change section of the PPG, available here: <https://www.gov.uk/guidance/flood-risk-and-coastal-change>

¹³⁵ Surrey Heath Strategic Flood Risk Assessment 2020 (or as updated).



- e) the scheme incorporates flood protection, flood resilience and resistance measures appropriate to the site, giving due consideration to any neighbouring land or property.
 - f) for development proposals in the developed flood zone 3b, the footprint of the proposed building(s) is no greater than that of the existing building(s) and there will be no increase in vulnerability.
- 4) All development proposals are required to demonstrate that drainage provisions will be adequate and will not result in an increase of surface water run-off. Development should promote SuDS (Sustainable Drainage Systems) to manage surface water drainage, within the curtilage of the development. Where SuDS are provided, fully detailed documentation must be provided with the locations of any assets, maintenance regime and ownership (costs liability) clearly stated. Arrangements must also be put in place for the ongoing management and/or repair of any SuDS systems over their full lifetime. SuDS should:
- a) ensure that surface water containment with any associated flood risk is managed as close to the source as possible and does not increase flood risk elsewhere;
 - b) accord with all relevant building regulations, current at the time of development;
 - c) where appropriate, discharge of surface water to watercourse or sewer system is not to exceed pre-development (greenfield) runoff rates;
 - d) ideally be designed as multi-functional, incorporating storage (attenuation) into landscaping and public realm to improve amenity and biodiversity;
 - e) be designed with due consideration for ease of future maintenance and meeting potential climate change needs.
- 5) Development within Groundwater Source Protection Zones and Principal Aquifers will only be permitted provided if it can be demonstrated, through technical detail, that there will be no adverse impact on the quality of groundwater resource and it does not put any risk of the ability to maintain public water supplies.



Reasoned Justification

Strategic Flood Risk Assessment

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

Climate Change

- 6.60. There is increasing concern about the impacts of climate change on the global environment. In the UK, projections indicate that climate change will result in more frequent, short duration, high intensity rainfall and more frequent periods of long duration rainfall. These changes are likely to result in a more frequent occurrence of all types of flooding, including fluvial. The NPPF emphasises that development plans should take a proactive approach to mitigate and adapt to climate change, taking into account the long-term implications for flood risk. The SFRA (2021) includes consideration for the impact of climate change on flood risk within and beyond the plan period.



- 6.61. The SFRA (2021) identifies that most recent climate change guidance, at the time of this Level 1 SFRA, was published by the Environment Agency in February 2016¹³⁶. This guidance supports the NPPF and must be considered in all new developments and planning applications. The guidance includes climate change predictions for the anticipated change of peak river flow and peak rainfall intensity. The SFRA identifies that planners and developers should consider where development may be at risk (or increased risk) of flooding in the future when undertaking the Sequential and Exception Tests, and that they should consult with the local authorities and seek the latest available guidance.

New Development

- 6.62. The SFRA will be used in the determination of planning applications for allocated and windfall sites. New development will need to minimise flood risk, including risk from surface water sewers and watercourses, and applications should have full regard to the SFRA in developing proposals. Any proposed development within areas of flood risk will require flood management and mitigation measures, also demonstrating that the development is safe from flooding. Where appropriate or where requested by the planning authority, applications will need to be accompanied by a Flood Risk Assessment (FRA).
- 6.63. In accordance with the NPPF, as set out in footnote 55, site specific FRAs should be provided for:
1. Any development proposals located within Flood Zone 1, 2 and 3
 2. Any development site of 1 hectare or more
 3. Any land which the Environment Agency identifies as having critical drainage problems (no areas currently identified within Surrey Heath).
 4. Any land identified in a SFRA as being at increased flood risk in the future.
 5. Any land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use.

¹³⁶ Environment Agency, February 2016. Flood Risk Assessments: Climate Change Allowances.



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

SuDS

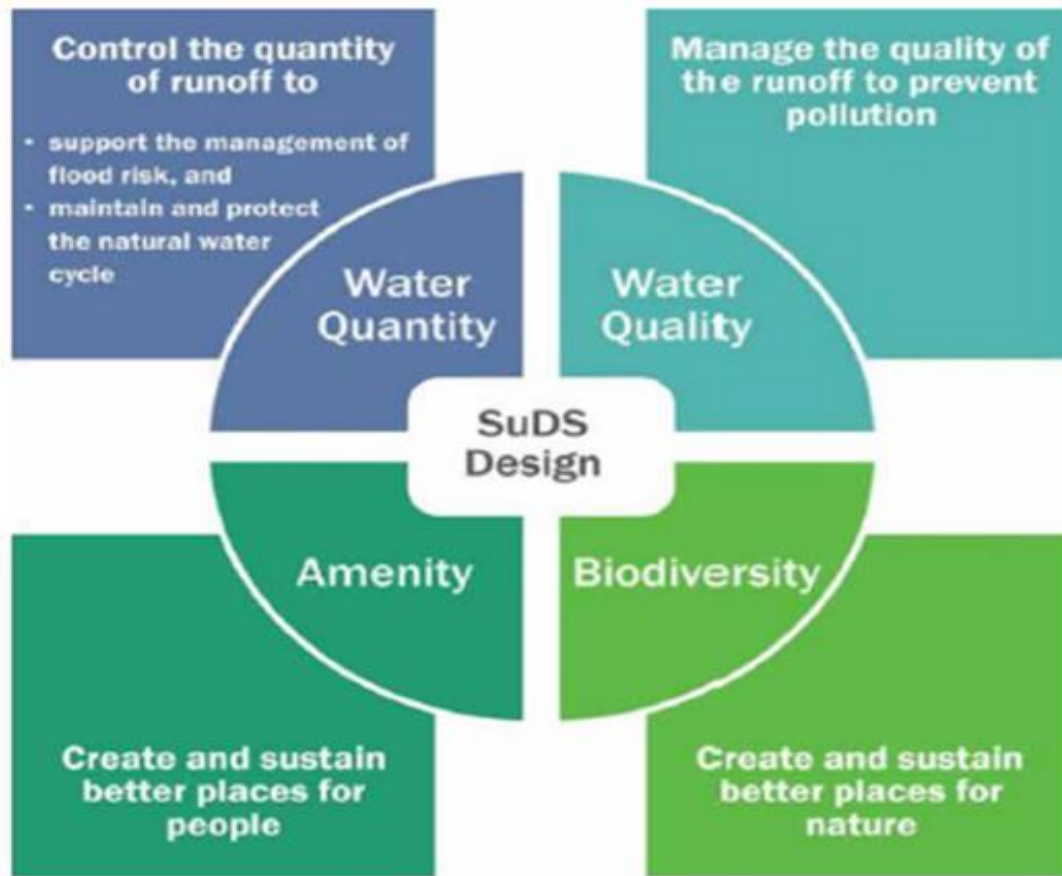
- 6.65. Surface water run-off and overland flow occurs when rainfall is unable to soak into the ground or enter drainage systems. Often surface water flooding can be short-lived, lasting only briefly after the rainfall event. However, flooding may persist in low-lying areas, where ponding occurs, or where there is a reliance upon entry to piped drainage systems that may be prone to blockage by conveyed debris such as leaves or other vegetation. Managing surface water flooding at its source is the most effective way of minimising run-off from a site and preventing flood risk to the surrounding area. The Council therefore promotes the use of sustainable (SuDS) techniques to control flows within developments, reducing flood risk both within the site and to neighbouring areas, in-turn reducing pollution and providing landscape and wildlife benefits. In addition, SuDS should be designed to ensure they remain effective for storm events, enabling a fast entry of flows into containment systems. Under national policy, all major planning applications will require the inclusion of SuDS design. Although it is not mandatory for smaller schemes¹³⁷ under current legislation, the Council does encourage use of SuDS wherever possible.

¹³⁷ Developments of less than 10 dwellings.



6.66. For SuDS to be fully sustainable they should seek to comply with the key SuDS principles as set out in Figure 9 below. Further guidance on SuDS is provided in the Surrey Heath SFRA.

Figure 9: Four Principles of SuDS Design¹³⁸.



Critical Drainage Areas

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

¹³⁸ Source: The SuDS Manual C753 Ciria (2015).



Policy E7: Landscape Character

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

Policy E7: Landscape Character

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



Reasoned Justification

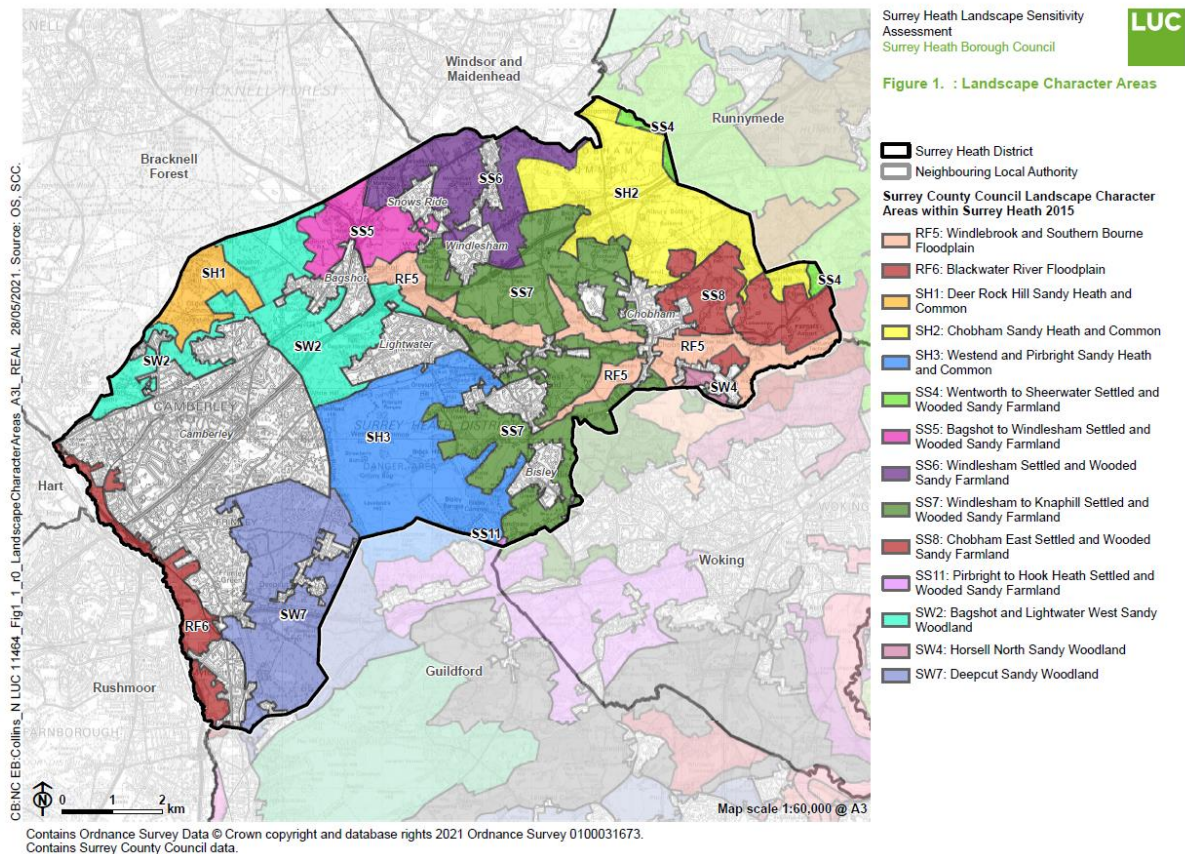
- 6.69. The NPPF identifies that strategic policies should set out an overall strategy for the pattern, scale and quality of development and make sufficient provision for matters including the conservation and enhancement of the natural, built and historic environment including landscapes. The NPPF also seeks to ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting and sets out that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes. The PPG also highlights that landscape character assessments should be prepared to complement Natural England's National Character Area profiles.
- 6.70. The diverse countryside of Surrey Heath plays a key role in defining the Borough's character and unique identity and is an important part of what makes the Borough an attractive place to live, work in and visit. The countryside within the Borough also performs a number of other roles, with 44% of land within the Borough forming part of the metropolitan Green Belt and as an area of importance for biodiversity in the central heathland areas.
- 6.71. The Surrey Landscape Character Assessment (2015) forms part of the evidence base from which development and management strategies can be derived, with particular reference to the conservation, enhancement or restoration of the landscape. A landscape character assessment is the process of mapping, classifying and describing the patterns and variations which contribute to the character of the landscape. The Surrey Landscape Character Assessment (2015) identified four broad Landscape Character Types (LCT)¹³⁹ within the Borough:
1. River Floodplains (RF)
 2. Sandy Heath and Common (SH)
 3. Settled and Wooded Sandy Farmland (SS)
 4. Sandy Woodland (SW)
- 6.72. These LCTs are further refined into 13 Landscape Character Areas¹⁴⁰ (LCA) as shown in Figure 10 below.

¹³⁹ Generic, often extensive, areas of landscape that share common features.

¹⁴⁰ Unique, discrete geographical areas of the Landscape Type.



Figure 10 – Landscape Character Areas



- 6.73. In order to better understand the relative sensitivity of the Borough's landscapes to residential development and identify opportunities for enhancement, the Council commissioned LUC to prepare a Landscape Sensitivity Assessment (2021) (LSA) for land outside settlements in the Borough. This study carried out strategic scale assessment of the LCA within the Borough and was guided by the advice contain in Natural England's 'Approach to landscape sensitivity assessment' (DEFRA, 2019).
- 6.74. The LSA study provided evidence of the underlying character of the landscape highlighting aspects of the landscape which are sensitive to future change and set out management guidelines for each of the character areas. The study assessed the landscape sensitivity as a measure of the resilience, or robustness, of a landscape to withstand specified change without undue negative effects on the landscape and visual baseline and their value.
- 6.75. Landscape sensitivity assessment requires judgements on both landscape susceptibility and landscape value (consensus about importance, which can be recognised through designation as well as through indicators of value such as landscape quality/ condition, scenic quality, rarity, representativeness, conservation interests, wildness, tranquillity and associations with particular people, artists, writers, or other media, or events in history).



- 6.76. The assessment set out the key characteristics and strategy (from the landscape character assessment), as well as a sensitivity evaluation and guidance on potential for mitigation and enhancement measures to reduce adverse effects on landscape and views and to maximise benefits arising from development. These guidelines should be taken into consideration when considering development proposals within these areas.
- 6.77. The landscape sensitivity can be used to inform planning decisions. Development proposals should take account of the landscape sensitivities and key positive landscape attributes of the site and surrounding area at an early stage of design. Proposals should strengthen and enhance landscape character and local distinctiveness wherever possible. This will include consideration of natural, socio-cultural, and perceptual aspects of character and using information set out in the Surrey Landscape Character Assessment and the Landscape Sensitivity Study and any subsequent studies. This information should be included in a design and access statement, masterplan, landscape proposal or Landscape and Visual Impact Assessment.
- 6.78. Proposals will be considered on a site by site basis based on their own merits, however they should ensure that any new landscape components are in character with the locality, form part of a coherent green infrastructure network and provide ecosystem services. It is important that valued features proposed for retention and areas for proposed enhancement and mitigation are clearly shown on a plan, as well as features that may be lost, so that the overall impact on landscape character can be properly assessed. A proportionate approach will be expected to be taken, based on the sensitivity of the landscape and the nature of the proposed development.
- 6.79. Appropriate measures will depend on the type of landscape in which the development is proposed, as set out in the Surrey Landscape Character Assessment and the Landscape Sensitivity Study. Management plans should be provided to indicate how the landscape will be managed to ensure its successful establishment and development.
- 6.80. The 2021 study also considers the built character of each landscape character area with particular reference to the presence of heritage assets that contribute to landscape character (i.e. valued features that may be designated as Conservation Areas, Scheduled Monuments, listed buildings, archaeological features or remains or other features). Landscapes with a higher density of historic features important to the character of the area are likely to be more sensitive to the introduction of modern development.
- 6.81. Registered Parks and Gardens also make an important contribution to the landscape character of the Borough and these are dealt with under heritage assets section later in the Plan (Policy DH7).



7. Section 7: Green Belt and Countryside

- 7.1. 44% of Surrey Heath is designated as part of the Metropolitan Green Belt. The main aim of the Green Belt is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and permanence. The Green Belt – including that in Surrey Heath – has a diverse range of functions. It protects land for agriculture, forestry and nature conservation; it is also a place for living and working in, as well as providing opportunities for people to access the countryside.
- 7.2. The Green Belt within Surrey Heath will be preserved and enhanced, in line with national policy. The National Planning Policy Framework (NPPF) sets out that, by definition, inappropriate development is harmful to the Green Belt and should not be approved except in very special circumstances. The NPPF indicates that whilst the construction of buildings within the Green Belt is generally inappropriate, there are some exceptions. It also sets out where the overall openness of the Green Belt should be preserved in order to prevent certain other forms of development from being inappropriate. This enables the Green Belt to continue to respond to changing needs.
- 7.3. The following policies set out the approach to development within the Green Belt in Surrey Heath and apply in addition to guidance set out within the NPPF.

Policy GBCI: Development of new buildings within the Green Belt

Policy GBCI: Development of new buildings within the Green Belt

New Buildings

- 1) The construction of new buildings in the Green Belt is considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.
- 2) Development proposals will only be permitted where they are consistent with the exceptions listed in national planning policy and are consistent with Green Belt policies within the Local Plan.
- 3) Where new buildings are proposed to replace buildings that are not lawful or are temporary in nature, the loss of these will not be taken into account in assessing the proposal.

Replacement Buildings

- 4) The replacement of an existing, lawful building with a new building in the same use will be permitted where it does not cause material harm to the openness of the Green Belt. Proposals for replacement buildings will be



permitted where:

- a) the floor space, volume and height of the resultant building is not materially larger than that it is to replace; and
- b) the siting or the position of the proposed building substantially overlaps that of the original building.

Proposals affecting Previously Developed Land

- 5) The limited infilling or partial or complete redevelopment of previously developed land will be permitted where it is in line with national policy.
- 6) In assessing proposals for the partial or complete redevelopment of previously developed land, regard will be had to:
 - a) the existing and proposed floor space and volume of the development;
 - b) the general height and storeys of existing and proposed buildings and their disposition around and within the site.

Limited Infilling

- 7) Exceptionally, limited infilling may be acceptable within the Green Belt outside of defined settlement areas as designated on the Policies Map where it can be demonstrated that the site should be considered to be within the village, such applications will be determined on a case-by-case basis.

Other development

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

Reasoned Justification

New and Replacement Buildings

- 7.4. In accordance with the NPPF, the Council recognises that in certain circumstances, new buildings are not inappropriate in the Green Belt. Where possible, new development should positively enhance the beneficial use of the Green Belt and be appropriate in scale, form and function to minimise development and preserve the openness of the Green Belt.
- 7.5. When considering proposals for replacement buildings and the redevelopment of previously developed land, the starting point is an assessment of the impact of existing development upon the openness of the Green Belt in comparison to the quantum of development proposed. For example, an existing area of hard standing can be regarded as 'development' but its impact on openness is significantly less than a proposed building.



- 7.6. In assessing proposals for replacement buildings, the Council will calculate volume using the basic formula of area multiplied by height, based on the external structure. Floor space will similarly be calculated on gross external area. In calculating floor space, the Council will take into account useable space under roofs¹⁴¹, covered balconies and mezzanine floors. The inclusion of a basement to increase floor space does not preclude it from being taken into account when considering whether a proposed replacement building is materially larger. Basements may also be considered to impact upon the openness of the Green Belt, depending on their design. For instance, a basement that is wholly subterranean and served only by discreet light wells, ventilation systems or means of escape will have a lesser impact upon openness than one that is only partially subterranean.
- 7.7. As a general guide, replacement buildings that would represent an increase in floor space and volume of more than 30% over and above the size of the buildings they replace are likely to be regarded as materially larger. In respect of proposals affecting previously developed land, different locations and forms of development will present different site-specific characteristics. In this regard, the details of any application will be judged on its own individual merits.
- 7.8. The impact of any other ancillary aspects of a development proposal including (but not limited to) garages and other outbuildings, walls and gates, areas of hardstanding and their use and external storage on the openness of the Green Belt will be considered under the requirements of the NPPF. Cumulatively, these may have an unacceptable impact on the openness of the Green Belt.

Previously Developed Land

- 7.9. Previously developed land is defined within the NPPF as land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings (including polytunnels and glass houses); land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

¹⁴¹ Useable space is taken to be any area with a head height exceeding 1.5m.



- 7.10. In respect of siting, applicants are encouraged to take the opportunity to make improvements to the openness of the Green Belt where possible, taking into account the particular visual sensitivity of open and prominent locations. This could include focusing development in a less conspicuous or open part of a site or removing a sprawl of buildings in favour of a single, cohesive development that leaves the remainder of the site open.
- 7.11. In cases where the successful implementation of a proposal is not physically dependent upon the demolition of an existing building, but the demolition of an existing building is considered integral to the acceptability of the scheme on Green Belt grounds, conditions and where necessary, legal agreements, will be used to secure demolition of the identified existing buildings, either prior to construction or as otherwise agreed with the Local Authority. In some instances, the Council may also apply conditions to remove permitted development rights. In such cases, the Council will also expect any buildings constructed under permitted development following the granting of the consent to be demolished prior to construction. This will also be controlled by condition.

Limited Infilling

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



Policy GBC2: Development of Existing Buildings within the Green Belt

Policy GBC2: Development of Existing Buildings within the Green Belt

Extensions or alterations to an existing building

- 1) The extension or other alteration of a building will be permitted where it does not result in disproportionate additions over and above the size of the original building and does not cause material harm to the openness of the Green Belt. In assessing proposals for the extension or alteration of existing buildings, regard will be had to:
 - a) the floor space, volume and height of the proposed development together with any previous extensions or enlargements, including works carried out under permitted development;
 - b) any changes to roof form;
 - c) alterations to footprint which may increase the spread and site coverage or materially increase the prominence of the building.

Re-use of buildings

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

Reasoned Justification

- 7.15. The extension or alteration of a building in the Green Belt is not considered in national or local planning policy to constitute inappropriate development, providing that the proposed development is not disproportionate to the size of the original building and therefore by definition harmful to the openness of the Green Belt. In line with national planning policy, the original building is taken to be the building as it existed on 1 July 1948 or, if constructed after 1 July 1948, as it was built originally.



- 7.16. In assessing proposals for extensions or alterations, the Council will calculate volume using the basic formula of area multiplied by height, based on the external structure. Floor space will similarly be calculated on gross external area. In calculating floor space, the Council will take into account useable space under roofs¹⁴², covered balconies and mezzanine floors. The inclusion of a basement to increase floor space does not preclude it from being taken into account when considering proposals for extensions. As a general guide, extensions that would represent an increase in volume and floor space of more than 30% over and above the size of the 'original' building are likely to be regarded as a disproportionate addition.
- 7.17. Case law has indicated that proposals to erect a new ancillary building in close proximity to a main building may be treated as an extension to the main building, taking into account the proximity of the proposed building to the main building. This will be assessed on a case by case basis. The volume and footprint of any lawful existing buildings to be demolished within a site may in some cases be included in the increase in volume and floor space of the extension, taking into account their size, permanence, design and proximity to the building to be extended.
- 7.18. In cases where the successful implementation of a proposal is not physically dependent upon the demolition of an existing building, but the demolition of an existing building is considered integral to the acceptability of the scheme on Green Belt grounds, conditions and where necessary, legal agreements, will be used to secure demolition of the identified existing buildings, either prior to construction or as otherwise agreed with the Local Authority. In some instances, the Council may also apply conditions to remove permitted development rights. In such cases, the Council will also expect any buildings or extensions constructed under permitted development following the granting of the consent to be demolished prior to construction. This will also be controlled by condition.
- 7.19. The re-use of agricultural or rural buildings provides opportunities for the diversification of the rural economy and contributes to the economic growth of the area. It can also contribute towards the reduction in demand for new buildings in the Green Belt and can be a means of conserving traditional buildings which are a distinctive feature within the Borough's rural landscape. Buildings can often be converted without causing material harm to the open character of the Green Belt. However, the Council recognises that particular uses or levels of use can either directly or indirectly have an adverse effect. For example, whilst the re-use of a vacant building for residential accommodation in itself may be acceptable, some associated features such as fences and walls, driveways, domestic paraphernalia and ancillary buildings could harm the openness of the Green Belt. The effect of these and similar features will be assessed when dealing with re-use applications.

¹⁴² Useable space is taken to be any area with a head height exceeding 1.5m.



- 7.20. The re-use of buildings that are not lawful, or that are temporary in nature, will not be permitted.
- 7.21. The re-use of buildings may also give rise to the need to re-accommodate the displaced use. The proposal should not result in the need to construct an additional building unless it can be clearly demonstrated that the building to be re-used is no longer suitable to accommodate the use concerned and the new building is otherwise compliant with the NPPF and Policy GBC1.

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

- 7.22. Within the rural areas of Surrey Heath there are many equine related businesses and facilities ranging from large scale livery stables and stud to small scale private equestrian facilities.
- 7.23. Equine related development can impact upon rural areas through the proliferation of associated ancillary development, overgrazing of pasture and overuse of Bridleways. However, the Council also recognises the positive role that equestrian use can play in the rural environment if properly managed and the positive role it has to play in the rural economy and access to recreational opportunities.

Policy GBC3: Equestrian Facilities

- 1) Equestrian related development within the Green Belt and Countryside beyond the Green Belt will be permitted where the following criteria are met:
 - a) The amount of development proposed is demonstrated to be reasonably related to its intended use and the amount of pasture land available;
 - b) The re-use of existing buildings is prioritised;
 - c) Any new development required to accommodate the use has been demonstrated to be necessary and is suitable in respect of its siting, design, scale, layout, external materials and appearance;
 - d) The proposal would not adversely impact upon the character of the landscape, the nature conservation value of the land and the quality of the pasture, by reason of overgrazing or otherwise;
 - e) The development would not have a detrimental effect on the amenity of neighbouring properties and the wider local area by reason of noise, smell, overlooking, light pollution or other general disturbance in accordance with Policy E4; and



- f) The development is sustainably located in terms of general accessibility and in relation to the existing bridleway network, and will not result in the over-use or deterioration of bridleways nor cause a hazard to other highway users.
- 2) In addition to the criteria above, proposals for equestrian facilities within the Green Belt will be expected to preserve the openness of the Green Belt and not conflict with the Green Belt purposes and be consistent with Policies GBC1 and GBC2.

Reasoned Justification

- 7.24. The Council will seek to ensure that the scale of any equestrian related development, including cumulative impacts, is appropriate to its current or proposed operation, whether private facilities or commercial businesses. The Borough Council considers that equestrian related development should retain or maintain a compact form and will resist proposals which would lead to dispersed forms of development. The Borough Council will seek to ensure that any stabling and ancillary development is appropriately scaled and sited in order to maintain the open and rural character of the countryside and Green Belt.
- 7.25. The level of provision of pasture proposed for horses will be assessed on a case-by-case basis. The Council will also look at any constraints on the use of the land such as existing or proposed buildings and landscape features e.g., access tracks, trees or watercourses, which would reduce the total amount of 'useable' pasture available for horses. Applications for stables or looseboxes on land below 0.4 hectares may only be considered acceptable where the applicant demonstrates an adequate provision of accessible, available land to allow for the proper care (exercise and grazing) of the proposed number of horses. In all cases, applicants will be expected to demonstrate the adequate provision of land to allow for the proper care of horses, including stabling, grazing and exercise, in accordance with the Equine Industry Welfare Guidelines¹⁴³ and the British Horse Society standards¹⁴⁴.

¹⁴³ Available online at: <https://newc.co.uk/mp-files/newc-welfare-compendium.pdf/>.

¹⁴⁴ Available online at: <https://www.bhs.org.uk/advice-and-information/horse-care>.



Policy GBC4: Development within the Countryside

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

GBC4: Development within the Countryside

- 1) The Council will protect areas of countryside for their intrinsic character and beauty. Development within the countryside beyond the Green Belt will only be permitted where it meets one or more of the following:
 - a) It consists of the re-use of a permanent and lawful building for alternative uses;
 - b) It comprises an extension or the replacement of an existing building;
 - c) It would meet proven essential need of a rural worker to live permanently at or near their place of work;
 - d) It supports the development or diversification of agricultural and other land-based enterprises;
 - e) It would provide for the growth and expansion of businesses in rural areas in accordance with Policy ER5;
 - f) It consists of operational development directly linked to institutional and other facilities and the need is proven;
 - g) It provides an exception site suitable for first time buyers in line with Policy H10 – First Homes Exception Sites;
 - h) It relates to the partial or complete redevelopment of previously developed land;



- i) Provides small scale, informal recreation facilities required in association with a new or existing outdoor recreation use; and,
 - j) Other minor forms of development ancillary to the development/uses set out above.
- 2) Development within the countryside must:
- a) not lead to harmful physical or visual coalescence between settlements;
 - b) be sustainable for the proposed use and of a high quality of design;
 - c) not cause unacceptable harm and where possible, enhance the open character and integrity of the countryside.
- 3) The Council will encourage schemes that result in environmental and landscape improvement, enhance biodiversity and nature conservation, and support better accessibility by sustainable means.

Reasoned Justification

7.28. It is recognised that some development can take place which is beneficial to the countryside and the people that live and work there. Development in the countryside will therefore be permitted where it can be demonstrated that a countryside location is necessary and sustainable. Inappropriate forms and types of development will not be supported.

Rural workers

7.29. For the purposes of this policy rural workers are defined as workers engaged primarily in farming, forestry or other rural based industries. In assessing need, account will be taken of whether there is a clear functional requirement for the person to be readily available on the site. Consideration will also be given to whether the worker is fully or primarily employed on the site, whether the business is financially sound and has a clear prospect of remaining so, the size of the proposed dwelling (which should be commensurate with the established functional requirement); and whether the need can be met by an existing dwelling on the site. Evidence on these matters should be submitted with any planning application. An appropriate condition or legal agreement restricting occupancy will be required to ensure it remains for the purpose for which it was granted. Applications which are primarily made on the grounds of providing security will not generally be supported.



Economic growth

- 7.30. There are a number of commercial and institutional uses operating in the countryside where development may be required for operational purposes or to support sustainable economic growth. Such uses include educational and training institutions, Ministry of Defence facilities, offices and agricultural and land-based business which require a rural location. Development proposals within these sites should be appropriate in scale to the site's rural context and should be located, designed and mitigated in a way that minimises their impact on the countryside, for example by siting new buildings within the existing built envelope.

Homes

- 7.31. It is important to deliver a wide choice of homes to meet the needs of different groups in the community including planning for affordable homes in rural areas, and for specialist types of housing. To meet identified local housing needs, it may be appropriate to permit first homes exception sites within the countryside, in line with National Policy.

Previously developed land

- 7.32. In considering the impact of proposals for the redevelopment of previously developed land and replacement buildings upon the openness of the countryside, the scale and impact of the proposed development will be compared with the scale and impact of any existing building(s) to be demolished. Applicants will be encouraged to take the opportunity to make improvements to the openness of the countryside where possible, which could include focusing development in a less conspicuous or open part of a site or removing a sprawl of buildings in favour of a single, cohesive development that leaves the remainder of the site open.
- 7.33. Buildings can often be converted without causing material harm to the character of the countryside. However, the Council recognises that particular uses or levels of use can either directly or indirectly give rise to adverse impacts. For example, whilst the re-use of a vacant building for residential accommodation in itself may be acceptable, some associated features such as fences and walls, driveways, domestic paraphernalia and ancillary buildings could harm the open character of the area. The effect of these and similar features will be assessed when dealing with re-use applications. The re-use of buildings may also give rise to the need to re-accommodate the displaced use. The proposal should not result in the need to construct an additional building unless it can be demonstrated that the building to be re-used is no longer suitable to accommodate the use concerned.
- 7.34. New development should not lead to the host building becoming more visually intrusive in the countryside.



Small scale and ancillary developments

- 7.35. Small scale developments such as interpretation boards or shelters, small interpretation centres, bird watching hides and minor car parking areas will be permitted where they enable enhanced enjoyment of the countryside, particularly rights of way, for visitors, subject to there being no significant adverse impacts for example on landscape, ecology, designated sites, and traffic.
- 7.36. The impact of any other ancillary aspects of a development proposal such as outbuildings, walls and gates, areas of hardstanding and their use and external storage on the character and integrity of the countryside will be considered. Cumulatively, these may have an unacceptable impact on the countryside.

Separation of settlements

- 7.37. In some parts of the Borough the towns and villages are relatively close together. Maintaining the separation between settlements will ensure that the settlements remain distinct from each other, in addition to providing green infrastructure benefits and supporting wildlife networks close to settlements. Development on the edge of these settlements can reduce the physical extent of the gap and development within the gaps themselves could reduce the visual separation of settlements. Development of any type that would result in a perception of the settlements coalescing and losing their separate identity will be refused. In some circumstances limited development may be acceptable, for example where the proposal is of a rural character, e.g., agricultural buildings, and has a very limited impact on the existing gap between the settlements.



Policy GBC5: Gordon's School, West End

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

Policy GBC5: Gordons School

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

Reasoned Justification

- 7.39. Gordon's School was founded as the Gordon Boys' Home in 1885 by public subscription as a National Memorial to Gordon of Khartoum, an officer of the Corps of Royal Engineers, who was killed in 1885. The school website claims that the idea came from Queen Victoria, who was its first patron. The reigning monarch of the United Kingdom has been patron ever since.
- 7.40. The school site covers an area of about 17.7 ha with a core area of about 6.5ha. The site straddles the A319 Bagshot Road. The main campus is to the south of Bagshot Road and comprises a range of buildings dating from late 19th Century to more modern teaching accommodation. There are four Grade II listed buildings in the core part of the site.
- 7.41. The northern part of the site contains the main playing fields, car parking and ancillary buildings. A new sports hall with changing rooms and ancillary facilities and a new All Weather Pitch were permitted in 2018 and are expected to be completed in 2021. A footbridge link over Bagshot Road links the two parts of the site.
- 7.42. The area included within this Policy comprises previously developed land. The school is a high performing school and over the lifetime of this Plan may require further alterations and improvement. Any development will have to meet national and local Green Belt policy requirements as well as the criteria set out in GBC5.



8. Section 8: Design and Heritage

Policy DHI: Design Principles

- 8.1. New development will be required to achieve a high quality of design that responds effectively to the needs and character of the area in which it is set and contributes positively to the retention and enhancement of the quality of life of existing and future communities. The Council will strive to ensure that new development leads to the creation of beautiful and sustainable buildings and places.
- 8.2. Good design can create and sustain economically and socially successful places with a clear identity that promote healthy living and a strong sense of community. Places should be well-connected, easy to navigate, provide natural security through layout and design whilst providing attractive, well defined and overlooked streets, roads and spaces with clear thought given to the relationship between land uses and their surrounding environment.

Policy DHI: Design Principles

- 1) All development must achieve a high standard of design that positively contributes to placemaking. Development proposals should be design-led and will be of a high quality and inclusive design that respects local distinctiveness and utilises opportunities to improve the character and quality of the area.
- 2) Development will be permitted where it is demonstrated that it:
 - Local character**
 - a) respects the distinct local character of the area and responds to and reinforces locally distinct patterns of development and their rural, village or urban setting paying particular regard to height, scale, materials, massing and bulk.
 - b) incorporates a level of architectural detail and use of materials that responds to the distinct local character of the area.
 - c) protects trees and other vegetation worthy of retention and includes high quality hard and soft landscaping that respects the distinct local character.
 - d) would not have a detrimental impact upon heritage assets or their setting, in line with their significance.
 - Residential amenity**
 - e) provides a high standard of residential amenity, including privacy and amenity space for future occupants appropriate to the proposed use.



- f) would not adversely affect the amenities enjoyed by the occupants of neighbouring properties, having regard to loss of daylight and sunlight, loss of privacy, overbearing impact and pollution.

Climate Change

- g) contributes positively towards climate change mitigation and adaptation by incorporating measures to reduce environmental impact and build resilience in accordance with Policy SS3b.

A Healthy Place

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

Safe, connected and efficient places

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

Crime prevention and security measures

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

Access and inclusion

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

Infrastructure to create smart places

- r) includes provision of up to date digital communications infrastructure in accordance with Policy IN3.



- 3) in developing proposals, regard should be had to local design and character guidance contained within Conservation Area Appraisals, Neighbourhood Plans and Supplementary Planning Documents (SPDs).

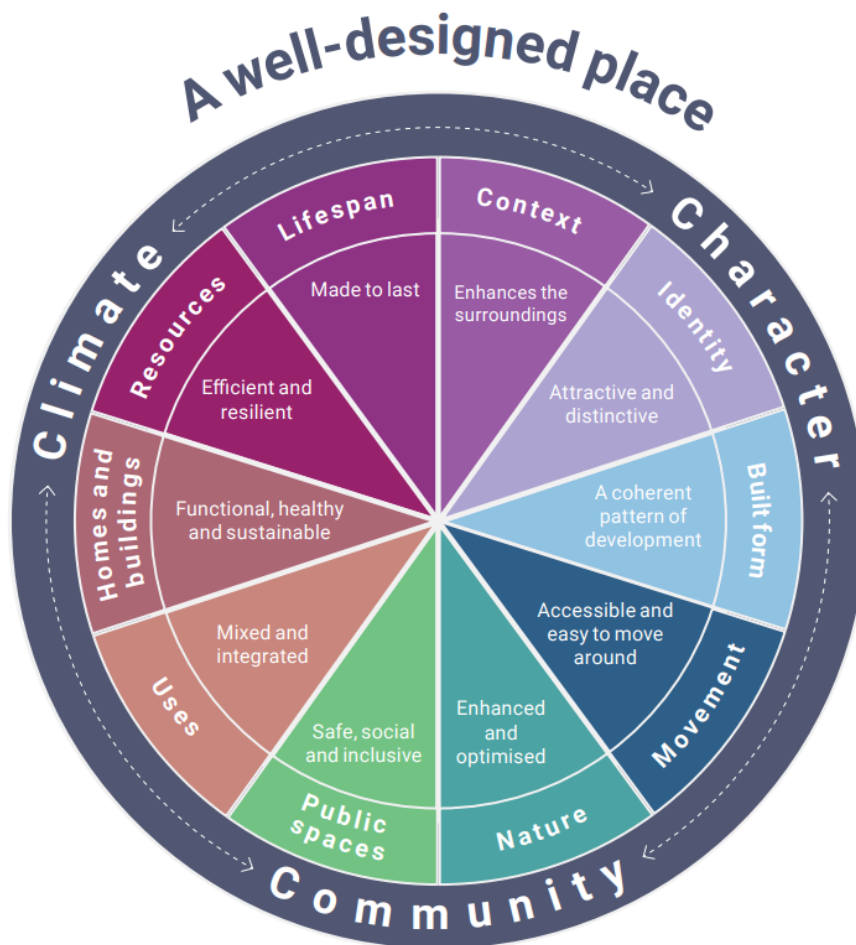
Reasoned Justification

- 8.3. The NPPF makes clear that creating high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development and creates better and healthier places in which to live and work.
- 8.4. Planning Practice Guidance signposts to the National Design Guide¹⁴⁵ for detailed guidance and also advocates the application of assessment frameworks such as the Building for a Healthy Life assessment framework. The National Design Guide illustrates how well-designed places, which are beautiful, healthy, greener, enduring, and successful, can be achieved in practice. The National Design Guide sets out the ten characteristics of well-designed places, which work together to create physical character, nurture and sustain a sense of community and work positively to address environmental issues affecting climate change. Figure 11 shows a visual illustration of the ten characteristics of well-designed places.
- 8.5. The National Model Design Code provides detailed guidance on the production of design codes, guides and policies to promote successful design and expands on the ten characteristics of good design set out in the National Design Guide. Design codes can provide a framework for creating healthy, greener, environmentally responsive, sustainable and distinctive places, with a consistent and high-quality standard of design.

¹⁴⁵ Available online at: <https://www.gov.uk/government/publications/national-design-guide>.



Figure 11: The National Design Guide ten characteristics of well-designed places



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



- 8.7. Policy DHI covers all forms of development within the Borough, however it is recognised that not all criteria will apply to all forms or scales of development. For example, development proposals for householder extensions will need to have particular regard to the impact of development upon character and residential amenity, but will not be capable of maximising connectivity or opportunities for pedestrian and cycle movement. As such the application of Policy DHI should be proportionate to the development proposed.
- 8.8. High quality design should respond to and enhance local character, whether rural, village or urban, through its positive contribution towards architecture, public spaces and natural and historic environments¹⁴⁶, whilst allowing for innovative and forward thinking design. The relationship of the built environment to the landscape must be taken into account and the transition from rural to urban character will need to be reflected in the design of development proposals, with green approaches to settlements respected.
- 8.9. Building in connectivity and permeability to developments has multiple benefits that extend beyond site boundaries. By increasing connectivity between people, places and services, places become more sustainable, vibrant and healthy. Considerations in respect of connectivity will vary depending on the scale and location of development and the opportunities provided by the local area. Opportunities to build in connectivity and permeability to developments should be identified at the outset when considering the design of new development proposals. Particular regard should be had to maximising connectivity between sites allocated under Policy HAI where they adjoin, or lie in close proximity to one another.
- 8.10. The built and natural environment is a key environmental determinant of health and wellbeing outcomes. The design of buildings and places is intrinsically linked to human health. It is estimated that illness and injuries caused by poor housing cost the NHS £1.4 billion a year¹⁴⁷. Poor quality housing has particularly detrimental effects on the people who spend most time at home, such as the elderly, young children, people who are ill, home-workers and the unemployed. New buildings and places offer the opportunity to deliver high quality, healthy, efficient homes and spaces for generations to come. Good quality homes and neighbourhoods will support and enhance the physical and mental health of the people who live there. Adaptable and accessible homes help people remain independent and in good health for longer, supporting their participation in their community and wider society.

¹⁴⁶ Including the setting of designated and non-designated heritage assets.

¹⁴⁷ See BRE (2016) The full cost of poor housing. Available online at: www.brebookshop.com/samples/327671.pdf.



- 8.11. The Surrey Heath Climate Change Study¹⁴⁸ identifies the contribution that good design plays in addressing climate change mitigation and adaptation. A good quality home will be designed to keep people healthy in our future climate, allowing for warmth through the winter months while avoiding overheating during the summer months through appropriate design. The design of new development should also consider the potential to maximise the provision of onsite renewable energy¹⁴⁹, for example solar PV, through appropriate design. Further guidance will be provided through a Climate Change and Green Infrastructure SPD.
- 8.12. The Council supports the delivery of walkable neighbourhoods, including the principles of the 20 minute neighbourhood, recognising that a complete, compact and connected neighbourhood where people can meet their everyday needs within a short walk or cycle has multiple benefits including boosting local economies, improving people's health and wellbeing, increasing social connections in communities, and tackling climate change.
- 8.13. In 2015 a security element was introduced within the Building Regulations in England, however this addressed the detailed design of dwelling houses only, omitting other forms of development and the wider built environment. High quality, well-planned design can reduce the opportunity for crime and anti-social behaviour beyond the front door through careful consideration of the layout, materials and environmental design of development. Secured By Design (SBD) is a police initiative that provides useful guidance on crime prevention and security measures and promotes improvements to the security of both buildings and the wider public realm to provide safe places to live, work, shop and visit.
- 8.14. Policy HI sets out accessibility requirements for new dwellings, however accessibility should not be a consideration for new dwellings alone; it is essential for accessibility considerations to be taken into account at the outset when considering the design of new development proposals. This will ensure that developments are resilient to changing needs and inclusive, enabling access to as many people as possible, regardless of age, gender and disability.

¹⁴⁸ Available online at:

www.surreyheath.gov.uk/sites/default/files/Surrey%20Heath%20Local%20Plan%20-%20Climate%20Change%20Study.pdf

¹⁴⁹ Either for installations during construction or to be added at a later date.



- 8.15. To encourage high quality design, the Council will expect strategic proposals incorporating 50 or more dwellings or exceeding 10,000sqm in floor space to be subject to assessment by a Design Review Panel. Design Review Panels are organised by Design South East (DSE) and provide impartial expert advice to applicants and local authorities on design issues in relation to important new development schemes. The Design Review Panel's feedback is a material consideration for local authorities when determining planning applications and are best undertaken at a pre-application stage.
- 8.16. Paragraph 134 of the NPPF indicates that planning permission should be refused for development that is not well designed, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents (SPDs) such as design guides and codes. Paragraph 134 also sets out that significant weight should be given to development which reflects local design policies and government guidance on design (including local guidance and SPDs) and to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design in an area where they fit in with the overall form and layout of their surroundings. The Council has a range of adopted design guidance including the Residential Design Guide SPD, in addition to the Borough's Conservation Area Appraisals, Neighbourhood Plans, Design Codes and other Supplementary Planning Documents (SPDs). In addition, local area profiles set out in Section 9 of the Draft Local Plan set out the distinctive characteristics of urban areas and villages. These should all be taken into account at the outset when considering the design of new development proposals.



Policy DH2: Making effective use of land

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

Policy DH2: Making Effective Use of Land

- 1) Residential development will be permitted where it makes efficient use of land, in a manner compatible with the site itself and the local character of the area.
- 2) Site allocations will be expected to deliver the minimum density specified within Policies HA1 – HA5 of the Local Plan. Proposals for all other major¹⁵⁰ residential developments are expected to achieve the following minimum net densities, based on their location in the Borough:

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

¹⁵⁰ In line with The Town and Country Planning (Development Management Procedure) (England) Order 2010, major development means the number of dwellings to be provided is 10 or more, 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 development is to be carried out on a site having an area of 1ha or more.



<ul style="list-style-type: none"> • Frimley Green; • Mytchett. 	
<p>Defined Settlement Areas of:</p> <ul style="list-style-type: none"> • Bisley; • Chobham; • Lightwater; • West End; and, • Windlesham (including Snows Ride). 	30dph

3) Proposals that do not meet these density standards will only be permitted where it has been demonstrated that development at the identified density would be inappropriate.

4) Proposals for minor residential development are expected to demonstrate how they have achieved an efficient use of land.

Reasoned Justification

- 8.19. Paragraph 125 of the National Planning Policy Framework (NPPF) indicates that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is important that planning policies and decisions avoid homes being built at low densities; developments should make optimal use of each site. To this end, the NPPF indicates that plans should incorporate minimum density standards for town centres and other locations well served by public transport that seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate. In accordance with the National Planning Policy Framework, it may also be appropriate to introduce minimum density standards for other parts of the Local Plan area.
- 8.20. Sites allocated within the Surrey Heath Local Plan have already been scrutinised to determine their optimal density, taking into account the sustainability of their location, the need to accommodate a mix of uses (where relevant), housing mix, significant environmental and policy constraints including the impact upon trees and heritage assets and the need to provide on-site infrastructure, such as SANG.
- 8.21. For sites not allocated within the Local Plan, Policy DH2 identifies a range of densities, and seeks to concentrate higher densities where there are more sustainable transport opportunities and a range of facilities and employment opportunities available, including Camberley Town Centre and sites with 800m of railway stations at Bagshot, Blackwater, Camberley (outside of the town centre) and Frimley. The policy then cascades this approach to apply an appropriate density to the Borough’s other settlements.



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



Policy DH3: Residential Space Standards

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

DH3: Residential Space Standards

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

Reasoned Justification

- 8.26. These standards deal with internal space within new dwellings and are suitable for application across all tenures. It sets out requirements for the gross internal area (GIA) of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home, notably bedrooms, storage and floor to ceiling height¹⁵¹. The justification for introducing this standard in the Borough is set out in a Housing Standards Background Paper on the Local Plan evidence webpage.
- 8.27. Applicants are required to demonstrate how the internal space standards have been applied and are encouraged to provide floor plans not smaller than 1:100 scale, with metric room dimensions identified and the gross internal area (GIA) clearly identifiable. Housing which exceeds minimum dwelling sizes will be encouraged.
- 8.28. This Policy also applies to applications for changes of use and conversions to residential use. From April 2021 changes to the Town and Country (General Permitted Development) (England) Regulations mean that all residential units delivered under permitted development rights must meet the Nationally Described Space Standards.

¹⁵¹ The current standards can be accessed at: <https://www.gov.uk/government/publications/technical-housing-standardsnationally-described-space-standard>.



Policy DH4: Sustainable Water Use

- 8.29. Water stress is a key issue in Surrey Heath. The Surrey Heath Climate Change Study¹⁵² recognises that the entire central-southern part of England is classed as water stressed, and this situation is set to worsen significantly due to climate change, with an increasing reliance on major infrastructure to store and transport water from parts of the country that are not water stressed.
- 8.30. A proactive approach is therefore needed to take full account of water supply and demand considerations, including whether the application of a tighter water efficiency requirement for new homes is justified to help manage demand.

DH4: Sustainable Water Use

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

Reasoned Justification

- 8.31. The NPPF expects plans to take a proactive approach to mitigating and adapting to climate change, taking into account long-term water supply considerations, including whether the application of a tighter water efficiency requirement for new homes is justified to help manage demand.

¹⁵² Available online at:

<https://www.surreyheath.gov.uk/sites/default/files/Surrey%20Heath%20Local%20Plan%20-%20Climate%20Change%20Study.pdf>.



- 8.32. All new homes already have to meet the mandatory national standard set out in the Building Regulations of 125 litres per person per day. However, where there is a clear local need, local planning authorities can set out a Local Plan policy which requires new dwellings to meet the tighter Building Regulations optional water efficiency requirement of 110 litres per person per day.
- 8.33. Water provision in Surrey Heath is under the jurisdiction of South East Water within the west of the Borough and Affinity Water in the east of the Borough. In respect of the evidence available to justify the requirement to meet the tighter water efficiency standard, the Environment Agency report 'Water Stressed Areas: Final Classification' (2021) identifies that the South East Water and Affinity Water areas are characterised by serious water stress, this is based on current and future water usage and climate change scenarios.
- 8.34. The Hart, Rushmoor and Surrey Heath Water Cycle Study (AECOM, May 2017) recommends water use per person per day for new homes meets the specific water use standard of 110 l/h/d in line with the Building Regulations Optional Requirement (the Regulations already require developers to submit such evidence before a completion certificate can be granted) and that non-domestic building should as a minimum reach 'Good' BREEAM status. On the basis of this evidence, the Local Plan requires a tighter optional water efficiency requirement of 110 litres per person per day in the construction of all new dwellings over the Plan period. This will be consistent with the adopted Local Plans in the rest of the Water Cycle Study area (Hart and Rushmoor).

Policy DH5: Trees

- 8.35. Trees are a defining characteristic of Surrey Heath; they provide important local landmarks, transform roads into green corridors and make a valuable contribution to the character and quality of urban environments. They complement the built environment by providing screening, perspective, privacy and seclusion and define open spaces. They also provide a valuable resource in terms of biodiversity, amenity and for climate change adaptation and mitigation, providing habitats for a range of wildlife and forming a "carbon sink" helping to absorb and counteract the harmful effect of carbon dioxide emissions.
- 8.36. Paragraph 131 of the NPPF states that planning policies should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.



- 8.37. It is important that the benefits of trees, hedgerows and woodland are considered in relation to the need for development and, that existing trees are safeguarded and opportunities are taken to increase provision.

Policy DH5: Trees

- 1) Development proposals will be permitted where:
 - a) it can be demonstrated that trees, hedgerows and woodland of amenity or other value can be retained as an integral part of the design of development unless the requirements of 2) have been met; and
 - b) sufficient space is provided for trees and other vegetation to mature; and
 - c) provision is made for the care and protection of existing trees and hedgerows to be retained prior to, during and after the construction process, including measures for the long term management and maintenance of existing and new trees and landscaping.
- 2) Development will not be permitted which involves felling, significant pruning works (either now or in the foreseeable future) and/or potential root damage to trees of amenity or other value, unless one of the following circumstances apply:
 - a) their long-term survival would be compromised by their age or physical condition (except in cases of ancient or veteran trees); or
 - b) there are exceptional and demonstrable public benefits accruing from the proposal which clearly outweigh the current and future amenity and other value of the trees.
- 3) Where proposals would result in the loss of trees, appropriate replacement planting should be provided such that there is no net loss in the biomass equal to the original tree.
- 4) Landscaping is an integral element in layout design. Trees and landscaping schemes for new residential development and commercial floorspace will be expected to:
 - a) provide new trees appropriate to the landscape profile of the area;
 - b) ensure that, by nature of their location and species choice, they are designed so as to facilitate adaptation to climate change by providing shade, shelter and cooling; and,
 - c) provide sufficient space between development and the highway to enable new streets to be tree lined.
- 5) Trees and landscaping schemes, by nature of their location and species choice should ensure that they are designed so as to facilitate adaptation to climate change by providing shade, shelter and cooling.



Reasoned Justification

- 8.38. Trees are a valuable resource. They contribute to the quality and character of Surrey Heath's unique environment and to improving air quality, climate amelioration, conserving water, preserving soil, and supporting wildlife. An estimated 40% of Surrey Heath is treed. For these reasons and for their intrinsic value, the Council places great weight on the retention of existing trees wherever possible.
- 8.39. Consistent with advice in the NPPF on protecting valued landscapes, the presumption of this policy is that existing viable trees and hedgerows of value should be protected unless there are exceptional and demonstrable benefits in accepting their loss. The NPPF (2021) places greater significance on the protection of existing trees; particular consideration should be given to veteran or ancient trees, as defined by Natural England, in order to preserve their historic, ecological and amenity value. Due to their special status, planning permission will be refused for development which would result in the loss or deterioration of Ancient Woodland, aged or veteran trees unless the need for, and benefits of, the development in that location clearly outweigh the loss, in line with the NPPF. Encroachment into the root protection area¹⁵³ of ancient or veteran trees will be resisted.
- 8.40. Tree lined streets play an important role in defining the character of an area as recognised in the NPPF; they provide a feeling of rural or countryside living for both rural and built up areas. These trees help to soften built form and reduce the overall effects of climate change by providing shade below canopies and reducing airborne pollution, as well as enhancing biodiversity. They can also create attractive green screens between new buildings and the highway, making more attractive places to live and work. Any planned new roads need to take account of this and provide sufficient space and rooting environment for trees to mature and thrive. Where this is not possible, consideration should be given to the use of specific engineering solutions, such as soil cells.
- 8.41. Where new development is proposed the preference will always be to incorporate trees and significant hedges into the development. Where a proposed development retains existing trees on-site, a satisfactory arboricultural impact assessment should be submitted in accordance with BS5837:2012 (or the equivalent applicable standard should this be superseded over the plan period) and the Surrey Heath validation checklist. This statement should analyse the potential impact on the retained trees. Where proposed development would have an impact on trees, particularly where it would impinge on root protection areas of trees both within and outside the development site, a site specific arboricultural method statement should be submitted. The statement should demonstrate mitigation measures are in place to ensure that development works do not harm the existing tree.

¹⁵³ This is a buffer zone at least 15 times greater than the trunk diameter of the tree, or 5m from the edge of its canopy, if that is greater.



- 8.42. When assessing development close to trees, the health of trees both in the present and future should be considered. For example, providing habitable rooms close to maturing trees may result in a need for significant pruning to the trees in future which would have been avoided if the building had been located to give the tree room to grow at the outset. Proposals should ensure that existing trees to be retained are adequately protected through the entirety of a development and that they are capable of thriving both in the long term.
- 8.43. Where the correct design process is not followed and trees are pre-emptively removed before progressing a planning application, the Council will require substantive replacement tree planting of similar species to demonstrate compliance with this Policy to ensure development respects and enhances the visual amenity of the landscape. Early engagement of a professional arboriculturist will help to identify those trees that should be retained and those which should be removed to achieve a sustainable development. This may also reduce the likelihood of unauthorised tree works being undertaken, which could result in a prosecution.
- 8.44. In development proposals where there is evidence of deliberate neglect of or damage to protected trees, the deteriorated state of the asset will not be taken into account.
- 8.45. In exceptional circumstances where trees are to be lost, development will be permitted subject to adequate compensatory provision being made. This should in the first instance take the form of the replanting of tree(s) of appropriate size and species on the application site or in the vicinity (including mature or semi-mature trees) such that there is no net loss of trees. If this cannot be achieved a financial contribution equivalent to the value of the removed tree(s) will be sought. This will be calculated using an appropriate assessment calculation agreed with the Council such as CAVAT.
- 8.46. Planting of native species will be preferred and should in total ensure that there is no net loss in the carbon storage capacity of trees that were on the site. Where specific on or off-site planting proposals are negotiated as part of the overall enhancement of a particular development site, the replacement, protection and long-term maintenance of trees, shrubs and other natural features would normally be specified by condition or secured by a planning obligation, either a section 106 agreement or unilateral undertaking. Larger scale enhancement of green infrastructure would be funded directly through the Community Infrastructure Levy. The Climate Change and Green Infrastructure SPD will set out further detail regarding the expectations for new landscaping and the protection and planting of trees in relation to new development and their role in climate change adaptation and mitigation and in biodiversity enhancements.



Policy DH6: Shopfronts, signage and advertisements

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

Policy DH6: Shopfronts, Signage and Advertisements

- 1) Development proposals for new, or changes to, existing shop fronts will be permitted where they:
 - a) relate well to the building in which they are situated, having regard to scale, proportions, vertical alignment, architectural style and materials;
 - b) present an open and active frontage to the street;
 - c) retain and restore where possible existing historic shopfronts and features of architectural interest;
 - d) take account of good architectural features of neighbouring shop fronts so that the development will fit in well with the street scene particularly if located within a conservation area or on a heritage asset.
- 2) Advertisement consent will be granted where:
 - a) the location, scale, proportions, form of illumination, design and materials of the advert respects the character and appearance of the host building (including any historic significance), site and area;
 - b) the number of adverts is kept to a minimum to ensure that there is no harmful cumulative impact on the host building and/or the amenity of the area; and
 - c) there is no harmful impact to public safety or residential amenity.

Reasoned Justification

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



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



Safeguarding Heritage Assets and the Historic Environment

Policy DH7: Heritage Assets

- 8.54. Surrey Heath Borough's historic environment contributes to the Borough's character, sense of place and quality of life. The historic environment provides social and cultural benefits by creating a sense of familiarity and belonging, bringing communities together and connecting us to our shared past, in all its diversity. It can also play an important role in promoting economic prosperity by ensuring that an area offers an attractive and unique environment where people want to live and work.
- 8.55. The historic environment of Surrey Heath incorporates a distinct and diverse range of designated heritage assets. Within the Borough, these comprise 180 statutory listed buildings, 2 registered parks and gardens in addition to 9 Conservation Areas and 4 Scheduled Monuments. The process of designation has identified them as having a level of significance that justifies protection under specific legislation.
- 8.56. The Borough also comprises an array of non-designated heritage and archaeological assets which can include buildings, structures, areas and archaeology considered by the Local Planning Authority to be of local significance for their historic or architectural interest. These non-designated heritage assets are included on a Local List and areas of archaeological importance are surveyed and mapped by Surrey County Council. The Council will work proactively with external and internal partners and the community to ensure the Local List is up to date. Funding has been agreed to work jointly with Surrey County Council and undertake a review of the Local List to update or amend those non-designated heritage assets currently on the list and to identify those assets that have yet to be included. This review of the Local List is anticipated to be completed in 2022.
- 8.57. Cumulatively, these heritage assets provide a distinctive identity that is unique to Surrey Heath. They make tangible the Borough's historical influences, such as the presence of the military, its arable past and the wider geographical importance of the Borough identified by the historic A30 London to Lands End coaching route which passes through Surrey Heath and close by the Bagshot Village Conservation Area.
- 8.58. In order to maintain a thriving historic environment, National Planning Policy¹⁵⁴ requires Local Planning Authorities to set out a positive strategy for its conservation in their Local Plans. It takes account of the merits to sustain and enhance the significance of heritage assets and the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring.

¹⁵⁴ National Planning Policy Framework (NPPF) 2021, Paragraph 190.



8.59. The Council will support proposals which conserve and where required enhance the historic environment of Surrey Heath. Appropriate consideration will be given to ensure that those significant elements of the historic environment which contribute to Surrey Heath's character and sense of place are recognised for the positive impact they have in the Borough. These are to include:

1. Conservation Areas and listed buildings across the Borough, including those with a reference to Surrey Heath's military past, and its historic coaching route.
2. Camberley Town Centre and its locally important 19th and 20th Century buildings including the Grade II listed Obelisk.
3. The range of its places of worship.
4. Historic farm buildings and rural villages and hamlets.
5. Historic Parks and Gardens including the Grade II listed Bagshot Park.

Policy DH7: Heritage Assets

- 1) Proposals for development that affects heritage assets (designated and non-designated) will be supported where they conserve and enhance the significance, special interest and character and appearance of the heritage asset and its setting.
- 2) Proposals that would affect a designated or non-designated heritage asset must be supported by a heritage impact statement proportionate to the importance of the heritage asset and the potential impact of the proposal.

Designated Heritage Assets

- 3) Development proposals affecting designated heritage assets (Listed Buildings, Scheduled Monuments, and Historic Parks and Gardens) or their setting will be supported where they preserve and/or enhance the special character, appearance and distinctiveness of Surrey Heath's historic environment in a manner appropriate to their historic significance.
- 4) Great weight and importance will be attributed to preserving the significance of a designated heritage asset, irrespective of the potential level of harm.
- 5) Proposals which would result in substantial harm to, or the complete loss of the significance of a designated heritage asset, or its setting, will not be approved unless:
 - a) the nature of the heritage asset prevents all reasonable uses of the site;
 - b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;
 - c) conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and,



- d) the harm or loss is outweighed by the substantial public benefit of bringing the site back into use.
- 6) Where the development proposal would result in less than substantial harm to the significance of the designated heritage asset or its setting, this harm must be weighed against the public benefit of the proposal including, where appropriate, securing its optimum viable use. Clear and extensive justification for the harm should be set out in full in the Heritage Impact Statement.
- 7) Where there is a clear and convincing justification for the loss or partial loss of a heritage asset the Council will seek public benefits by requiring developers to investigate and record the features affected and provide publicly accessible interpretation which is appropriate to the scale and level of interest of the heritage asset.
- 8) Development proposals that affect Historic Parks and Gardens will be assessed by reference to the scale of harm, both direct and indirect, or loss to and the significance of the park or garden.

Conservation Areas

- 9) In accordance with legislation¹⁵⁵, the Council has a duty to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas in the Borough.
- 10) When considering development proposals within or adjoining a conservation area, including the alteration, extension or change of use of a building, the Council will support proposals which preserve or enhance:
 - a) existing architectural and historic character and associations by having regard to the positioning and grouping, form, scale, massing, detailing of development and the use of materials in its construction; and
 - b) areas of townscape quality; and
 - c) existing hard and soft landscaping features including areas of open space, trees, hedges, walls, fences, watercourses and surfacing and the special character created by them; and
 - d) the setting of the conservation area.
- 11) Proposals that would have a detrimental effect on such features will not be permitted. Built development will not be permitted on public and private open spaces within or adjacent to conservation areas where those spaces make a positive contribution to its character or setting, as identified in the conservation area appraisal, unless it can be demonstrated that the public benefit demonstrably outweighs the harm.

¹⁵⁵ The Planning (Listed Building and Conservation Areas) Act 1990.



Archaeological Sites

- 12) The Council will support development proposals which do not adversely affect nationally significant features of archaeological or historic importance or their setting.
- 13) Where a development has the potential to affect heritage assets with archaeological interest, the applicant will be required to submit an appropriate desk-based assessment and where necessary a field evaluation.
- 14) For scheduled monuments and non-designated heritage assets of archaeological interest that are demonstrably of equal significance to scheduled monuments, loss or substantial harm (through the removal of remains) should be wholly exceptional.
- 15) Within Areas of High Archaeological Potential or County Sites of Archaeological Importance, as identified on the Proposals Map, or outside of these areas on any major development site of 0.4ha or greater, applicants will be required to undertake prior assessment of the possible archaeological significance of the site and the implications of their proposals, and will be required to submit, as a minimum, a desk-based assessment to accompany any application. Where desk-based assessment suggests the likelihood of archaeological remains, the Planning Authority will require the results of an archaeological evaluation in order to inform the determination of the application. Prospective developers should also refer to the Historic Environment Record to establish whether there is known or potential archaeological interest and the need for investigation and evaluation at an early stage.

Non-designated heritage assets

- 16) Planning permission will only be granted for development affecting a local heritage asset or its setting if it is demonstrated that due regard has been given to the impact on the assets significance and its setting and that it is demonstrated that the significance of the asset and its conservation has informed the design of the proposed development. In determining whether planning permission should be granted for a development proposal, which affects a local heritage asset, consideration will be given to the significance of the asset, the extent of impact on its significance, as well as the scale of any harm or loss to the asset as balanced against the public benefits that may result from the development proposals.
- 17) The re-use of vacant or underused locally listed buildings will be supported where they contribute positively to their conservation either individually or as part of wider strategies for regeneration.

Buildings at Risk

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



Reasoned Justification

- 8.60. The NPPF (Annex 2) attributes significant weight to the term ‘setting’ in relation to heritage assets. It describes setting as the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral. Setting is also influenced by other environmental factors such as noise, vibration, smell and lighting from other nearby land uses.
- 8.61. For proposals affecting any designated or non-designated heritage asset or their setting, the Council expects applicants to describe the significance of any heritage asset affected. This should be set out within a Heritage Impact Statement. The level of detail should be proportionate to the assets’ importance and should be sufficient to enable the Council to understand the potential impact of the proposal on their significance. In the preparation of such a statement, the heritage asset and impact of works should be assessed by an appropriate expert and reference should be made to the Historic Environment Record (HER) as a minimum.
- 8.62. Where a proposal would result in substantial harm to, or loss of a designated heritage asset, the Council will also expect the Heritage Statement to incorporate the following:
- | | |
|---------------------|---|
| Stage 1: | Method of works informed by a condition survey and/or structural survey |
| Stage 2: | Design Stages: Impact of proposal on significance
Alternative options assessed |
| Stage 3 Conclusion: | Harm
Mitigation
Repairs specification |
- 8.63. Where loss of a heritage asset, whether designated or non-designated, is unavoidable, the developer should mitigate this loss through record and through the dissemination of that knowledge. Results of assessments and investigations which are a requirement and collected as part of development management are of public interest and will be made accessible, normally through the Surrey Historic Environment Record. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted. The dissemination of knowledge acquired can be produced as a published report, however it can be presented in other forms on site for community benefit e.g. presentation, engagement or public art.



- 8.64. There are many pressures on the historic environment, both in the urban areas and countryside. Inappropriate changes can have an irreversible impact on the historic character of an area whilst the historic aspects of buildings can be irrevocably lost through redesign, adaption and demolition. The PPG ¹⁵⁶ supports this by setting out that heritage assets being put to a viable use is likely to lead to the investment in their maintenance necessary for their long-term conservation. The Council will encourage developers to propose viable alternatives in keeping with a heritage assets original use.

Listed Buildings

- 8.65. National policy ¹⁵⁷ states that substantial harm to, or the loss of nationally important assets of the highest significance should be wholly exceptional. Substantial harm to or loss of a Grade II designated heritage asset should be classed as exceptional, however where this asset is of military interest then the Council would determine this as wholly exceptional given the military significance within the Borough.
- 8.66. Less than substantial harm to a designated asset of military interest will be judged on a case-by-case basis, but the Council will only allow such harm in exceptional circumstances.

Historic Parks and Gardens

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

Conservation Areas

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

¹⁵⁶ Planning Practice Guidance April 2014; Historic environment; paragraph 15 Reference ID:18a-015-20190723.

¹⁵⁷ National Planning Policy Framework (NPPF) 2021 paragraph 200.



Archaeological Sites

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



- 8.72. Surrey's archaeological resources are not all catalogued or reported, and it is known that large-scale ground disturbance has a heightened possibility of revealing archaeological remains which have not previously been recorded. In order to maintain a positive and proactive approach to the likelihood of encountering hitherto unknown archaeological heritage assets during development, and to ensure that such assets can have their significance assessed, the Council also requires that large-scale development proposals (here defined as those on sites over 0.4ha in size) examine the possibility that archaeological remains may be present through desk-based assessment and if necessary field evaluation, in line with the advice given in paragraph 194 of the NPPF.

Local heritage assets

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



Policy DH8: Building Emission Standards

- 8.77. The Government’s Net Zero Strategy: Build Back Greener (October 2021) makes a commitment to making the transition to low carbon buildings affordable and achievable for all. The Surrey Heath Climate Change Study (2020) identifies that residential buildings are the largest source of carbon emissions in the Borough. Drawing on the study’s findings, Policy SS3a identifies the need to deliver significant carbon emission reductions through the Local Plan. This Policy sets out the approach to building emission standards and embodied carbon¹⁵⁸ associated with construction waste management.

Policy DH8: Building Emission Standards

- 1) Proposals for zero carbon development are strongly supported. Planning permission will be granted for development which positively contributes to addressing climate change through low/zero carbon design that improves the energy efficiency of both new and existing buildings and provides low or zero carbon energy.
- 2) Development proposals for residential buildings will be supported where they adopt the fabric first¹⁵⁹ approach to contribute significantly towards achieving carbon emission reductions in accordance with Policy SS3a.
- 3) Development proposals for non-residential buildings will be required to achieve final certification standards against the Building Research Establishment’s Environmental Assessment Method (BREEAM) and/or CEEQUAL (or equivalents) as indicated in the table below. Development proposals which exceed these ratings will be supported and encouraged.

Development Type	Scale	2021-2029	2020-2037
New and Refurbished Non-Residential	500-5,000m2	BREEAM Very Good	BREEAM Excellent
	>5,000m2	BREEAM Excellent	
Public realm	Major works	CEEQUAL Very Good	CEEQUAL Excellent

- 4) Proposals with an estimated cost of £300,000 or above will be required to submit a Site Waste Management Plan (SWMP) which demonstrates how recycling and reuse will be maximised and carbon emissions minimised.

¹⁵⁸ Relates to the carbon footprint of a material, including those released throughout the supply chain.

¹⁵⁹ See supporting text.



Reasoned Justification

- 8.78. Policy SS3a identifies a significant ‘policy gap’ in carbon emission reductions that needs to be addressed through the Local Plan.
- 8.79. Policy DH8 follows the energy hierarchy whereby the fabric and heating/cooling of the building is given priority over the installation of renewable technology. This is commonly known as the ‘fabric first’ approach and is cited in the Governments Net Zero Strategy as being key to ensuring the transition to low carbon buildings. Following this method has multiple benefits: it is in accordance with the Government’s 2017 Clean Growth Strategy; it ensures that inefficient buildings are not constructed with renewable energy technology bolted on; and it avoids the construction of homes that require retrofitting in the future.
- 8.80. The government’s Future Homes Standard (FHS) 2019 consultation ¹⁶⁰ proposed to tighten the GHG emissions element of the Building Regulations (Part L) to the point where a 75-80% reduction on current requirements is achieved by 2025. The consultation document notably proposed that the Building Regulations should be adjusted in 2020 to remove ‘*the ability of local planning authorities to set higher energy efficiency standards*’.
- 8.81. The outcome of the Future Homes Standard Consultation ¹⁶¹ was published in January 2021 and identified that new planning reforms will clarify the longer-term role of local planning authorities in determining local energy efficiency standards. To provide some certainty in the immediate term, the document outlines that the Planning and Energy Act 2008 will not be amended, which means that local authorities will retain powers to set local energy efficiency standards for new homes.
- 8.82. Adopting assessment frameworks can be a vital, resource-efficient way of delivering better quality and higher standard design that contributes to climate change mitigation and adaptation. The BREEAM¹⁶² assessment framework for non-residential buildings is well established. Adopting the framework is designed to drive standards through benchmarking and positive recognition of high quality design, supported by formal verification.

¹⁶⁰ See [gov.uk/government/consultations/the-future-homes-standard-changes-to-part-l-and-part-f-of-the-building-regulations-for-new-dwellings](https://www.gov.uk/government/consultations/the-future-homes-standard-changes-to-part-l-and-part-f-of-the-building-regulations-for-new-dwellings).

¹⁶¹ Available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/956094/Government_response_to_Future_Homes_Standard_consultation.pdf.

¹⁶² See BRE’s BREEAM website, at <https://www.breeam.com/>.



- 8.83. The HQM, BREEAM and CEEQUAL assessment frameworks adopt the UKAS (United Kingdom Accreditation Service) accredited certification process. All schemes provide a holistic set of criteria which not only support the delivery of an energy efficient, resilient built environment, but also help to mitigate unintended consequences (such as those related to temperature control) and drive healthier, better-managed places. BREEAM and CEEQUAL assessments are made on a 'Good' to 'Excellent' and then 'Outstanding' scale. All development proposals should aspire to deliver the best possible ratings against the adopted assessment frameworks where feasible.
- 8.84. The Council will produce a Climate Change and Green Infrastructure SPD that will set out detailed guidance on how new development can contribute to climate change mitigation and adaptation. The SPD will provide guidance on the application of the assessment frameworks.
- 8.85. The energy performance standards set by the Building Regulations deal with operational energy use (e.g. lighting, cooling, heating and hot water); however, a building's true energy performance is also a product of the 'embodied carbon' in building materials and emissions created during the construction process. Furthermore, demolition, refurbishment and retrofitting all create carbon emissions and the potential to minimise these emissions can be considered at the design and construction stages. Such emissions will comprise an increasing proportion of total emissions over a building lifecycle, as operational emissions decrease due to electrification combined with grid decarbonisation.
- 8.86. The Council recognises that efficient construction activities can maximise the potential to recycle materials and limit the production of unnecessary waste. For example, offcuts of wood can be separated and recycled, such as for reuse in kitchen worktops, limiting waste production and the related carbon emissions when such materials degrade. Reductions in the carbon emissions related to construction waste may be delivered through planning conditions.
- 8.87. Site Waste Management Plans should therefore include consideration for embodied carbon within new development and include actions to minimise construction carbon emission and maximise recycling and reuse of construction materials that are appropriate to the site's context. Proposals with an estimated cost of £300,000 or above will be required to submit a Site Waste Management Plan (SWMP)¹⁶³.
- 8.88. The Climate Change and Green Infrastructure SPD will set out detailed guidance on how new development can minimise the whole life-cycle carbon emissions of development and minimise construction waste.

¹⁶³ See paragraph 5.4.24 of the Surrey Heath Climate Change Study:
<https://www.surreyheath.gov.uk/sites/default/files/Surrey%20Heath%20Local%20Plan%20-%20Climate%20Change%20Study.pdf>.



9. Local Area Profiles

- 9.1. Surrey Heath contains numerous towns and villages, each with its own unique character and identity. There is great diversity in the types of settlements in the Borough, from rural villages in the east, to larger towns and villages in the west, which are mainly urban in character.
- 9.2. The Local Area Profiles illustrate how policies and allocations in the Local Plan relate to each local area in the Borough. They include maps that illustrate the allocated sites and proposed designations in each local area in Surrey Heath. The Profiles contain principles to guide future development within the local areas as set out in the Local Plan policies, including the approach to protecting local character and distinctiveness. The Local Area Profiles have regard to the spatial strategy for Surrey Heath, which takes account of the differences in character between the west and east of the Borough.

West of the Borough

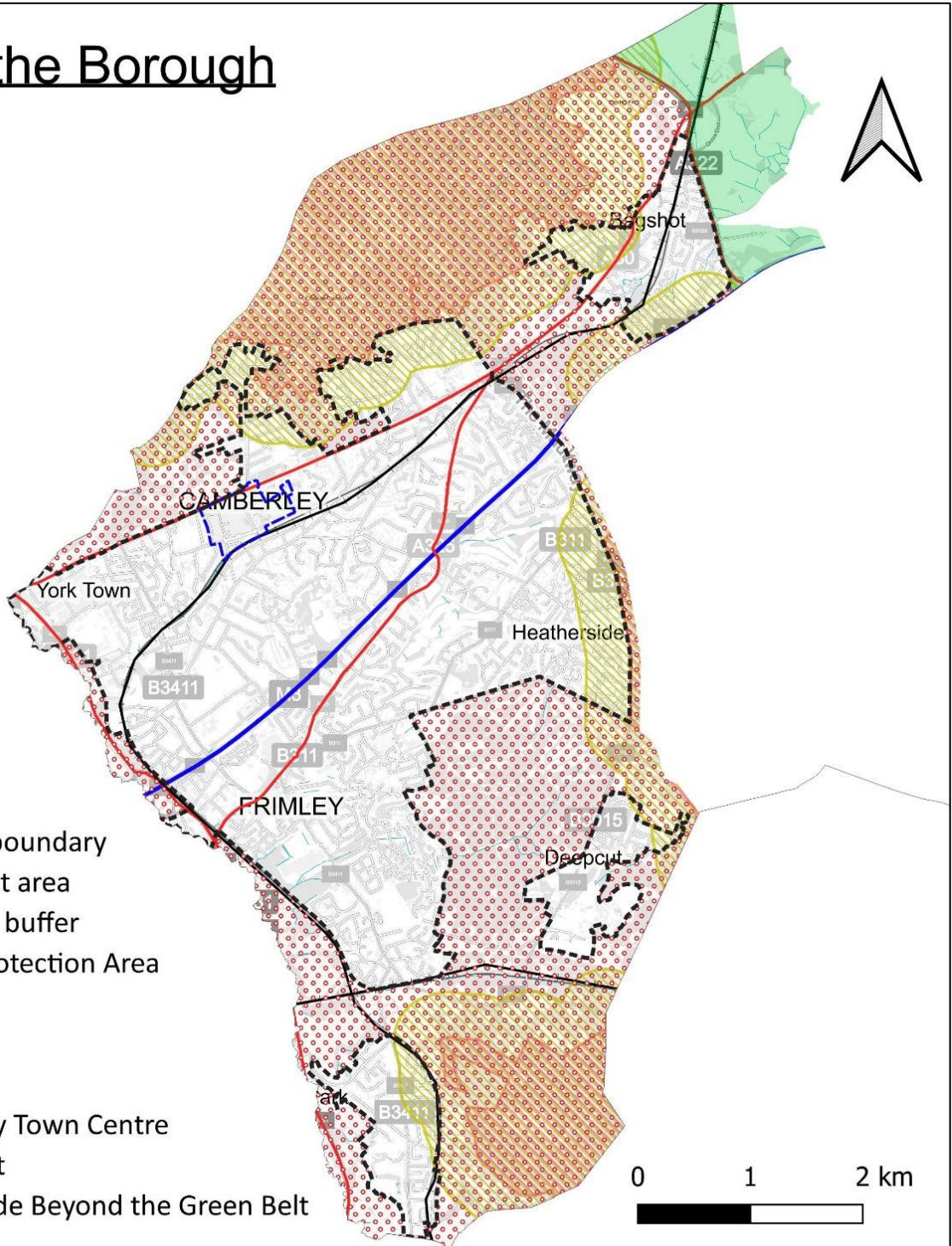
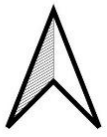
- 9.3. The west of the Borough is more developed than the east. The settlement areas of Bagshot, Camberley, Deepcut, Frimley, Frimley Green and Mytchett are all located in the west of the Borough. The western urban area comprises Camberley, Frimley, Frimley Green and Mytchett and is the largest built up area in Surrey Heath. It also adjoins neighbouring settlements in Hampshire and Berkshire and forms part of the wider Blackwater Valley area. Camberley is the largest settlement in the Borough. Camberley town centre has the greatest concentration of retail and leisure facilities in the Borough and is a key retail and commercial centre for the wider area.
- 9.4. The historic settlement of Bagshot is located northeast of Camberley and is separate from the western urban area. The metropolitan Green Belt lies to the east of Bagshot and the settlement is surrounded by Countryside Beyond the Green Belt on all other sides. Deepcut is a small settlement with a strong military heritage. It lies to the east of the western urban area and it is separated from this by countryside. Significant residential-led growth will take place in the local area of Deepcut over the plan period. In 2014, planning permission was granted for the strategic housing site, at Princess Royal Barracks which is now under construction.



- 9.5. The west of the Borough also contains areas of undeveloped land designated as Countryside Beyond the Green Belt, much of which is covered by international and national designations including part of the Thames Basin Heaths Special Protection Area (SPA) as well as the Thursley, Pirbright, Ash and Chobham Common Special Area of Conservation (SAC) In addition, many areas of countryside in the west of the Borough are owned by the Ministry of Defence and used for military operations. This means that certain areas can be temporarily inaccessible to members of the public for short periods of time when training exercises are taking place.
- 9.6. The spatial strategy directs the majority of development towards the local areas located in the west of the Borough as this is the most sustainable approach for accommodating new growth, and makes the best use of established infrastructure and services. The west of Surrey Heath is subject to less development constraints than the east, which is largely designated Metropolitan Green Belt land.

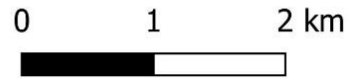


West of the Borough



Legend

- Borough boundary
- Settlement area
- SPA 400m buffer
- Special Protection Area
- Railway
- M3
- A road
- Camberley Town Centre
- Green Belt
- Countryside Beyond the Green Belt



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Bagshot

- 9.7. Bagshot lies in the north of the Borough in a prominent position on the A30 between Camberley and the village of Windlesham. The M3 motorway forms Bagshot's southern boundary and the village is immediately adjacent to Junction 3. Bagshot's eastern defined settlement boundary is bordered by the Green Belt. Land to the north of the A30 and to the south of the settlement area is within the Thames Basin Heaths Special Protection Area 400m buffer zone which restricts residential development in this area. The land to the west between Bagshot and Camberley is designated Countryside beyond the Green Belt.
- 9.8. Recent excavations have shown that first occupants of Bagshot date back as far as pre-Roman times. Since Stuart and Tudor times Bagshot has had a Royal hunting lodge which is now called Bagshot Park and is the residence of Prince Edward and Sophie, Earl and Countess of Wessex. In Elizabethan times Bagshot prospered due to its position on the main London to the West Country Road. Bagshot now has a population of around 7401¹⁶⁴ people. Growth of the village occurred during the first half of the 19th century, largely due to the coaching trade and agriculture, especially market gardening. Significant growth has occurred in the size of the village since the 1950's, and especially since the late 60's.
- 9.9. The Bagshot Village Conservation Area, designated in 1988, is centred on the junctions of High Street, Bridge Road and Guildford Road, creating a village centre marked by a notable late 19th century signpost in the middle of The Square. A collection of listed buildings, some of them dating to the 16th century, are interspersed with mainly late 19th or early 20th century buildings, many of them judged to be 'positive' in their contribution to the special interest of the conservation area. There are 9 statutory listed buildings in the conservation area listed grade II, apart from 44 High Street which is listed grade II* for its rare 16th century wall paintings. Overall, Bagshot still retains the character of an historic Surrey village, assisted by the domestic scale of the buildings and the vernacular details.

¹⁶⁴ ONS Ward Level Population estimates mid-2020:
www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/wardlevelmidyearpopulationestimatesexperimental



- 9.10. Bagshot Church Road Conservation Area is characterised by small polychrome brick villas which, although dissimilar, complement the style and materials of St. Anne's Church. The church was built in 1884 and the surrounding villas were erected at about the same time. The resulting unity of styles, particularly along the south side of Church Road, is fundamental to the character and appearance of the Conservation Area. The line of cedar trees between the Vicarage and "Healyhaugh" on the north side of Church Road are included within the conservation area as they figure prominently and positively in the streetscape and as such contribute to the setting of the conservation area.
- 9.11. The Bagshot Park Conservation Area comprises Bagshot Park Mansion, together with its gardens and surrounding fields and Home Farm, which forms the area of Bagshot Park. It lies just to the north of Bagshot and the A30. The Mansion was listed, Grade II, as a building of special architectural or historic interest in 1976.
- 9.12. It is recognised that the A30 is dominated by traffic and concern has been raised by residents regarding peak time congestion on this route. The village centre is served by Bagshot railway station on the Ascot to Guildford railway line. The village is also served by several local bus services, including the Camberley to Guildford route. There are very few official cycle routes in Bagshot, and those on the A30 are fragmented and not connected to the wider A30 network in Camberley, which starts at the Jolly Farmer roundabout. Opportunities to improve and extend the cycle network in Bagshot will be explored with Surrey County Council, the responsible authority for transport and public rights of way in Surrey Heath.
- 9.13. The retention of the identity of Bagshot as a village is important and the Local Plan will ensure that a gap between the settlement area of Bagshot and Camberley is maintained. The Windlebrook flows through Bagshot and some areas of Bagshot are affected by flooding, lying within the Environment Agency Flood Zones 2 and 3, including areas of the District Centre.
- 9.14. The Village Centre is designated as a District Centre as it contains a range of uses, serving an important role in Bagshot, providing a choice of retailers, local services and employment. Tanners Yard, to the North of Bagshot Village Centre, accommodates businesses in small scale office units, and is proposed for designation as a Locally Important Employment Site. The Waitrose and other retail development at the junction of London Road and Waterers Way lies apart from the District Centre and within land designated as Countryside beyond the Green Belt. The Local Plan will amend the settlement boundary of Bagshot to incorporate this retail development.

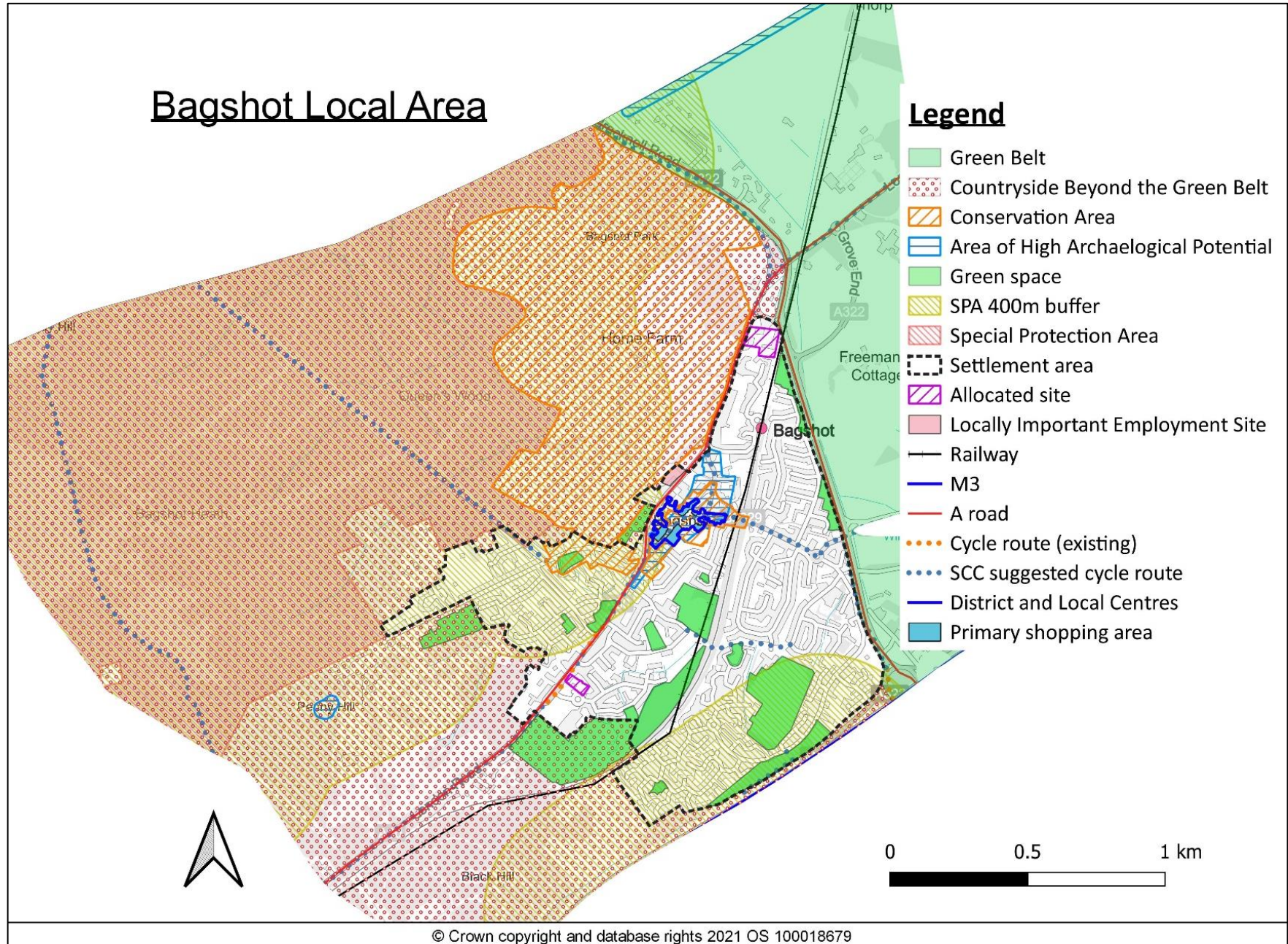


- 9.15. There are a significant number of proposed protected greenspaces in the Bagshot local area including allotments, school playing fields, woodland and SANGs. These greenspaces are an important feature of the character of Bagshot. There are also a number of locally listed buildings in the Bagshot area, including Hartdene Cottage and Brook Cottage. The Bagshot local area contains a number of Sites of Importance for Nature Conservation¹⁶⁵ (SINCs), including the Bagshot Park-Lake Meadow SINC and Freemantle Field SINC. There are also a number of individual and area TPOs in the local area, including the large area TPO at Pennyhill Park.
- 9.16. There are a concentration of retail uses, employment sites, transport links, and other services within Bagshot District Centre or in close proximity of the centre. It is therefore a sustainable location for growth. However, there are limited opportunities within Bagshot for future residential development, due to constraints on the availability of land and designations in the area, including the Thames Basin Heaths SPA. Much of the settlement area has already been built on or is designated as protected greenspace. There are a limited number of brownfield sites, which provide opportunity for delivering housing in the area to help meet local needs. It is considered that development in Bagshot will therefore largely come forward on brownfield and windfall sites, over the plan period.

¹⁶⁵ See glossary.



Bagshot Local Area



Local Area Principles for Bagshot

Design and Heritage

- 1) Ensure development complements the historic character of Bagshot by providing good quality development in accordance with design policy DH1.
- 2) Preserve and enhance Bagshot's designated heritage assets, and their setting, including the Grade II* Listed Wall Paintings at 44 High Street and Grade II listed buildings in Bagshot Village Centre, and the three Conservation Areas within the Bagshot Local Area, in accordance with Policy DH7.
- 3) Protect Bagshot's non-designated heritage assets where this is practically achievable, in accordance with Policy DH7.
- 4) Within Bagshot Village Conservation Area the design of shops fronts and signage should respect the character of the designated area, particularly its central core along the High Street, and be in accordance with the Bagshot Village Conservation Area Appraisal.
- 5) Within the Bagshot Road and Bagshot Park Conservation Areas, signage and advertisements should respect the character of the designated area and be in accordance with the respective conservation area appraisals.

Housing

- 6) To promote the optimum use of land in sustainable locations apply the minimum density standards set out in Policy DH2 for non-allocated major sites. This policy sets a higher density standard close to Bagshot train station of 70 dph and a lower minimum density standard of 40 dph in the rest of the Bagshot settlement area.

Employment and Retail

- 7) Protect employment land in Bagshot by allocating Tanners Yard as a Locally Important Employment Site as defined on the Local Plan Policies Map
- 8) Retain the designation of Bagshot as a District Centre, with revised boundaries that take account of the most up-to-date evidence in the Surrey Heath Retail Site Survey 2021, as defined on the Local Plan Policies Map

Transport

- 9) Maintain and improve pedestrian and cyclist access along the A30, encouraging sustainable modes of transport, in accordance with Policy SS3a.
- 10) Promote provision of pedestrian and cyclist access as part of any new major developments in accordance with Transportation Policy IN2
- 11) Support the provision of public transport and highways improvements within the area in accordance with Policy IN2.



Green Infrastructure and Greenspaces

- 12) Protect greenspaces in the Bagshot local area as shown on the Local Plan Policies Map, and in accordance with the requirements of Policy IN6.

Community Infrastructure

- 13) Community facilities in Bagshot will be protected in accordance with Policy IN4.



Camberley

- 9.17. Camberley is the largest settlement within the Borough and lies just beyond the Green Belt. The Population of Camberley is around 22,161 people¹⁶⁶. The Local Area Profile for Camberley does not include Camberley Town Centre, which is covered by a separate Local Area Profile.
- 9.18. Until the early 1800's the area now occupied by Camberley Town Centre and its surroundings was heathland and farmland. In 1862 the Staff College was established in the grounds of the Royal Military College and in order to accommodate the growth of shops and housing to serve the Staff College a basic street pattern was laid out, this was the beginning of the current centre. Camberley is home to the Royal Military Academy and the town retains close links with the military and its heritage. Camberley is the major retail and employment area in the Borough.
- 9.19. The Royal Military Academy/Staff College/A30 London Road Frontage Conservation Area was designated in 1989, located north of London Road between Laundry Lane and Camberley Town Centre. Upper Gordon Road to Church Hill Conservation Area was first designated in October 1989 and lies just south east of Camberley town centre and south of the railway line through the town, stretching down to Church Hill on the east side. The general character of the conservation area derives from the specific building period of the properties which are largely late 19th and early 20th century detached and semi-detached houses and villas. As such the area is an important representation of the growth of Camberley during this period.
- 9.20. The local area also contains a significant proportion of the Borough's employment sites, including the proposed Strategic Employment Sites at Watchmoor Business Park, Admiralty Way Business Park and Yorktown Business Park, and Locally Important Employment Areas at Bridge Trade and Industrial Park, St George's Industrial Estate and Helix Business Park. These employment areas are located in the west of Camberley in close proximity to junction 4 of the M3, enabling direct access to the Strategic Road Network.

¹⁶⁶ ONS Ward Level Population estimates mid-2020:
www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/wardlevelmidyearpopulationestimatesexperimental.



- 9.21. The A30 runs through Camberley and the area between the Meadows Gyrotory and Lower Charles Street includes a number of opportunity areas which would benefit from mixed use regeneration. The Camberley Local Area is well served by public transport, including Camberley Station which is served by the Ascot to Guildford line, along with a number of local bus services which link to areas of Hampshire, Berkshire and other parts of Surrey. However, there are very limited direct services provided between Camberley and London Waterloo. There is also a network of cycle routes within Camberley, offering access within the settlement and to neighbouring areas. The cycle routes along the A30 and Frimley Road are fragmented and could be improved. Opportunities to improve and extend the cycle network in Camberley will be explored with Surrey County Council, the responsible authority for transport and public rights of way in Surrey Heath.
- 9.22. The Blackwater River flows to the west of the Camberley Local Area and some areas lie within Environment Agency Flood Zones 2 and Flood Zones 3, including areas of York Town Business Park.
- 9.23. Outside of Camberley Town Centre there are neighbourhood parades at Old Dean and the London Road/Frimley Road junction in west Camberley, which provide a smaller range of shops and services for their local communities. The regeneration of the Neighbourhood Parade at Old Dean will be supported through Policy ER10. The existing Neighbourhood Parade at Watchetts, which is located on Frimley Road, is suggested for designation as a Local Centre. It contains a range of uses that provide a choice of retailers, local services and employment for the Local Area and has expanded in recent years¹⁶⁷.
- 9.24. There are a significant number of proposed protected greenspaces in the Camberley local area including allotments, school playing fields, woodland and SANGs. There are a number of listed buildings, including Woodcote House, and locally listed buildings, such as Mylesdown House, in the Camberley Local Area. Large areas of the Camberley Local Area, especially in St Paul's ward, are covered by area TPOs. There are also a number of SINC in the local area, including Tekels Park SINC and College Common SINC.
- 9.25. The Camberley local area has a concentration of retail uses, employment sites, transport links, and other services and is therefore a sustainable location for growth Camberley has significant scope for residential development and this will be primarily through the redevelopment of existing brownfield sites. Much of the land to the north of the A30 is affected by the Thames Basin Heaths Special Protection Area 400m buffer zone and as such this restricts the provision of general housing in this area.

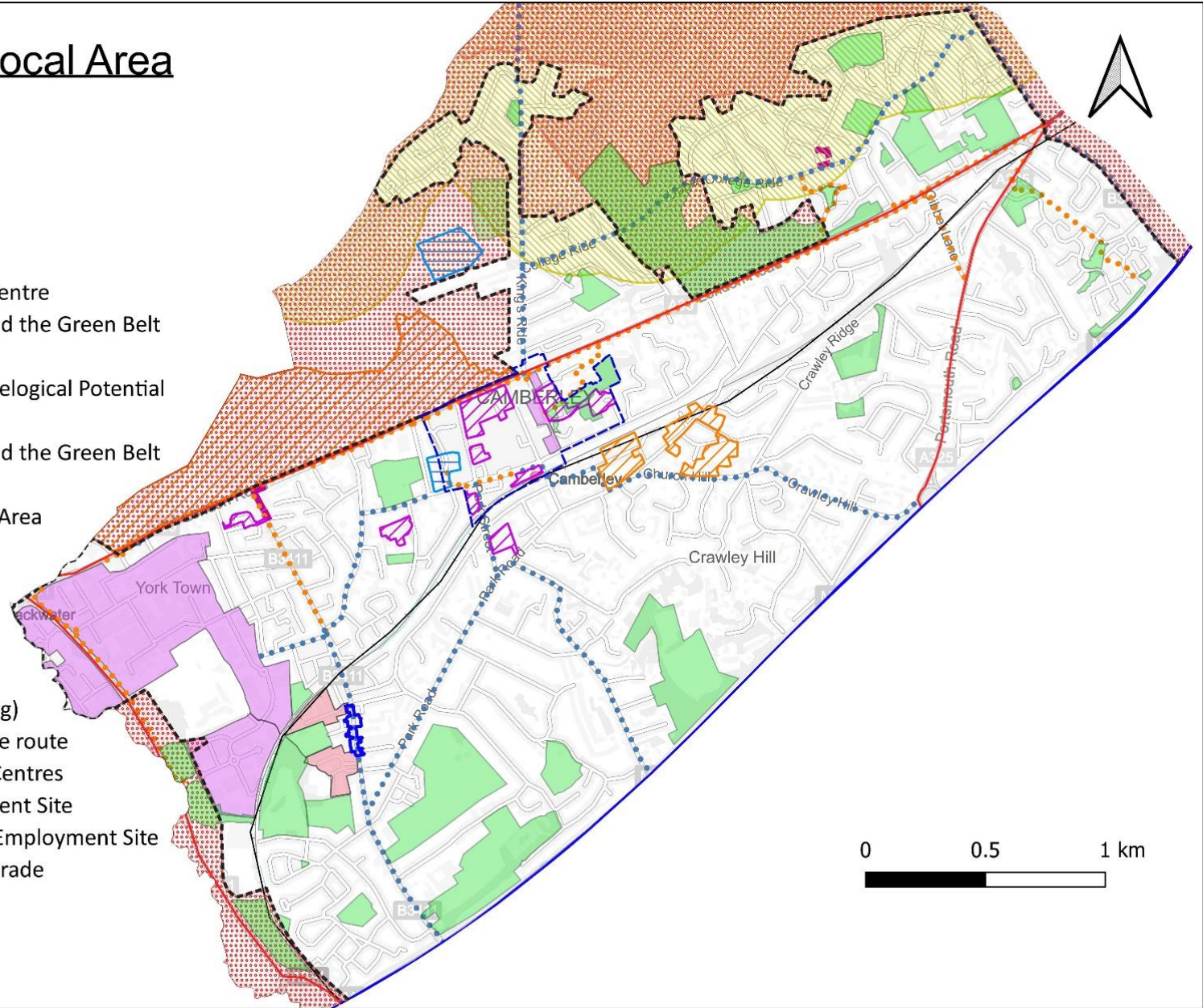
¹⁶⁷ Retail site survey 2019.



Camberley Local Area

Legend

- Camberley Town Centre
- Countryside Beyond the Green Belt
- Conservation Area
- Area of High Archaeological Potential
- Green space
- Countryside Beyond the Green Belt
- SPA 400m buffer
- Special Protection Area
- Settlement area
- Allocated site
- Railway
- M3
- A road
- Cycle route (existing)
- SCC suggested cycle route
- District and Local Centres
- Strategic Employment Site
- Locally Important Employment Site
- Neighbourhood Parade



Local Area Principles for Camberley

Design and Heritage

- 1) Ensure development complements its surroundings, having regard to its Victorian, Edwardian or modern setting, by providing good quality development in accordance with design policy DH1 Design Principles, and guidance contained within the Western Urban Area Supplementary Planning Document.
- 2) Preserve and enhance Camberley's designated heritage assets, particularly the Grade II listed buildings situated alongside London Road, and Camberley's two Conservation Areas, and their setting, in accordance with heritage Policy DH7.
- 3) Protect Camberley's non-designated heritage assets where this is practically achievable, in accordance with Policy DH7.
- 4) Within Camberley's Conservation Areas, signage and advertisements should respect the character of the designated areas.

Housing

- 5) To promote the optimum use of land in sustainable locations apply the minimum density standards set out in Policy DH2 for non-allocated major sites. This policy sets a higher density standard of 70 dph close to Camberley and Blackwater train stations and a lower density standard of 40 dph in the rest of Camberley area.

Employment and Retail

- 6) Protect employment land in Camberley by allocating Strategic Employment Sites, including Admiralty Way Business Park, and Locally Important Employment Sites, including Helix Business Park, as defined on the Local Plan Policies Map.
- 7) Redesignate Watchetts from a Neighbourhood Parade to a Local Centre, as defined on the Local Plan Policies Map.
- 8) Retain designation of Old Dean and London Road/Frimley Road Neighbourhood Parades, with revised boundaries taking account of the most up-to-date evidence in the Retail Site Survey 2021, as defined on the Local Plan Policies Map.
- 9) Seek improvements to Dean Parade, Old Dean, in accordance with Policy ER10.

Transport

- 10) Work with Surrey County Council to implement highways, pedestrian and cyclist improvements on the A30 London Road between the Meadows Gyratory and Camberley Town Centre, encouraging sustainable modes of transport and the expansion of the London Road green corridor.
- 11) The Council will continue to work with network rail and the train operator to identify opportunities for improvements to rail services from Camberley to London



- 12) Promote provision of pedestrian and cyclist access as part of any new major developments in accordance with Policy IN2.

Green Infrastructure and Greenspaces

- 13) Provide protection to greenspaces in the Camberley local area as shown on the Local Plan Policies Map, and in accordance with the requirements of Policy IN6.

Community Infrastructure

- 14) Community facilities in Camberley will be protected in accordance with Policy IN4.

Camberley Town Centre

- 9.26. Camberley Town Centre boundary is defined on the Policies Map. It is the principal shopping centre in Surrey Heath. The Town Centre is principally situated in Town Ward which has a population in the region of 5,000 people, although a small area of Park Street and the Atrium is within St Michaels ward. The town is situated close to the Surrey border with Berkshire and Hampshire, 30 miles south-west of central London in the corridor between the M3 and M4 motorways. The boundary of the town centre is drawn hard up against the residential area to the west. The A30 London Road to the north and the railway line to the south form logical physical boundaries to the Town Centre. The northern boundary includes properties around the Knoll Road junction. The boundary to the east includes the former St Tarciccius school site which has now been developed for housing.
- 9.27. The town centre has developed largely over the last 100 years. Its Victorian beginnings are still evident in the High Street and along the London Road (A30). The basis of the present town centre was laid out in the 1960's when the terraces of Victorian housing made way for a pedestrian precinct. This was updated in the early 1990's when the Main Square indoor shopping centre was created. Knoll Road to the east of the High Street is currently the main location of a number of civic and community uses. Behind the Council Offices is Camberley Park which is the main, open, greenspace within the town centre. The Park contains a children's play area, and a wooded walk leading up to The Obelisk, which is the only listed building in the town centre. There is no overall defining character to the town centre and there is a need to establish a coherent identity.

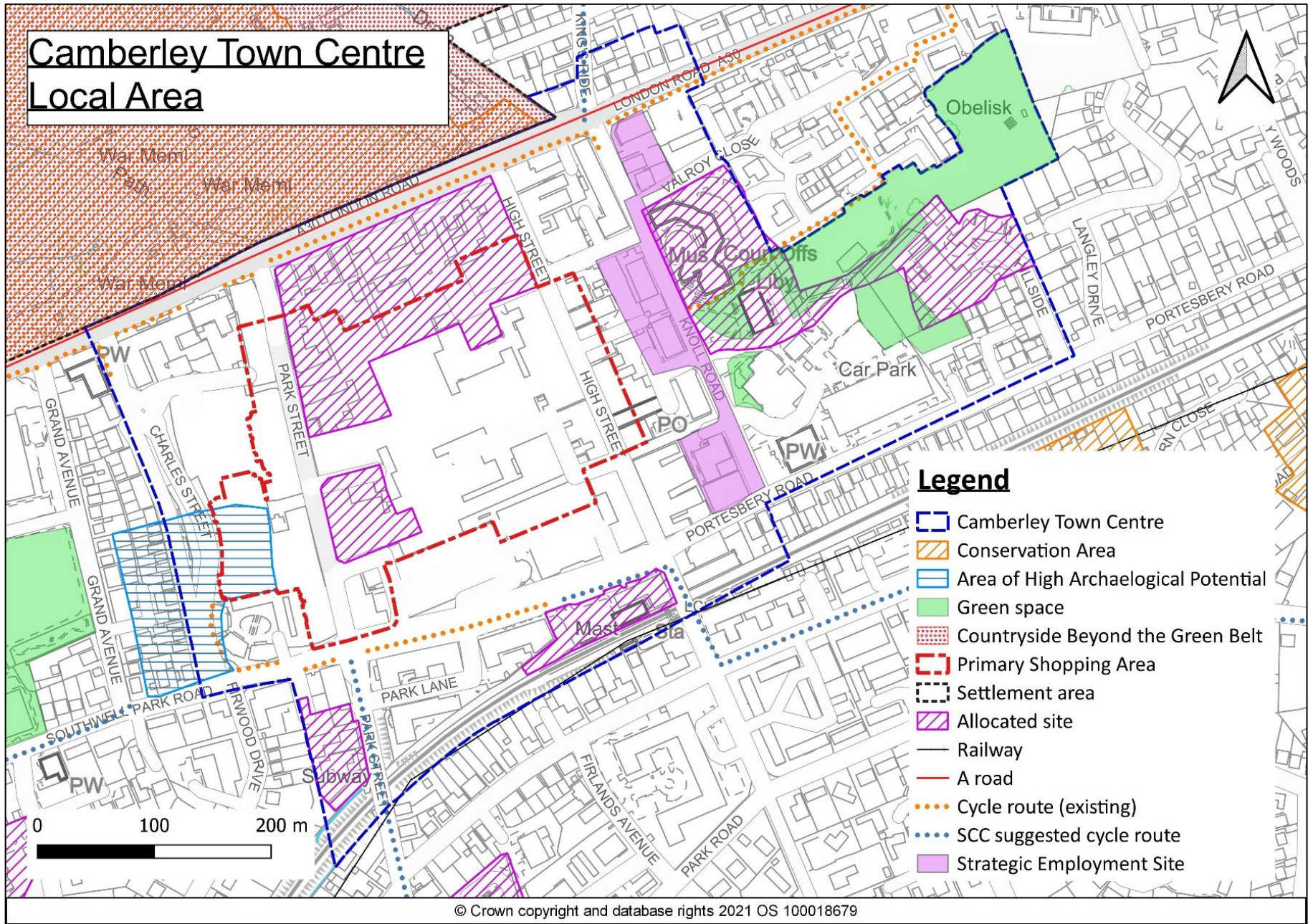


- 9.28. Surrey Heath Borough Council is now a major landowner in the town centre and owns The Square Shopping Centre and the area known as the London Road Block on the land to the north of the Square. Significant refurbishment of The Square has been undertaken and proposals for the redevelopment of the London Road Block are in progress. With a £3.5 million grant from the EM3 Local Enterprise Partnership significant public realm improvements have been delivered in the Town Centre is designated a Business Improvement District known as Collectively Camberley.
- 9.29. Camberley Town Centre has a primary retail catchment extending out to Windlesham in the east, Sandhurst in the north, Yateley to the west and Ash Vale to the south. Shoppers are also attracted from further afield, including Crowthorne, Hartley Wintey, Farnborough, Fleet and Bisley.
- 9.30. Camberley is identified as a Step up Town by the Enterprise M3 Local Economic Partnership (LEP), which means it has the potential for growth through a series of interventions, including housing, employment and retail growth. Camberley is strategically located in close proximity to junction 3 and 4 of the M3, providing access to the Strategic Road Network. The western side of Knoll Road area is proposed for designation as a Strategic Employment Site.
- 9.31. Camberley Town Centre is served by a train station (Ascot to Guildford line) and by a regular bus service to Farnborough and Aldershot. Camberley Station is allocated for residential development and an improved rail station. There are also bus services to Bracknell, Guildford, Woking and Yateley. A network of cycle routes within Camberley Town Centre, offers access within the centre and to neighbouring areas. Opportunities to improve and extend the cycle network in Camberley Town Centre will be explored with Surrey County Council, the responsible authority for transport and public rights of way in Surrey Heath.
- 9.32. Camberley Town Centre has the highest concentration of leisure, retail, financial and professional services, restaurants and cafes, and drinking establishments in the Borough. The Town Centre is a sustainable location for growth, served by a large number of retail uses, employment sites, transport links, and other services, and will be a key focus of residential development over the Plan Period. A number of developments are currently being implemented in the Town Centre, including the Ashwood House development, and several developments have recently completed, including the Camberley Police Station Site on Portesbery Road.
- 9.33. Camberley Park is the only designated greenspace in Camberley Town Centre, located east of Camberley Library. The Obelisk is the only statutory listed building in the Town Centre, whilst 24-26 Park Street is the only locally listed building.



- 9.34. Policies in the new Local Plan will replace policies in the Camberley Town Centre Area Action Plan (AAP) adopted in 2014. The AAP can be viewed here: <http://www.surreyheath.gov.uk/CamberleyTownCentreAAP> Changes in the way people use town centres, including growth of on-line shopping means that policies in the new Local Plan will not look to increase the amount of retail floor space but will promote a varied and flexible mix of uses appropriate for town centres, including a significant increase in new homes. Regeneration of Camberley Town Centre is a corporate priority for the Council and a wider Camberley Town Centre Strategy is currently being prepared.





Local Area Principles for Camberley Town Centre

Design and Heritage

- 1) Ensure development reflects its town centre location and complements the character of Camberley Town Centre, particularly within the High Street which is characterised by attractive Edwardian and Victorian buildings, by providing good quality development in accordance with design policy DHI Design Principles and Policy CTCI Camberley Town Centre.
- 2) Preserve and enhance Camberley Town Centre's sole Grade II designated heritage asset the Obelisk, and its setting, in accordance with Policy DH7.
- 3) Protect Camberley Town Centre's non-designated heritage asset where this is practically achievable, in accordance with Policy DH7.

Housing

- 4) To promote the optimum use of land in sustainable locations apply the minimum density standards set out in Policy DH2 for non-allocated major sites. This policy sets a higher density standard of 100 dph in Camberley Town Centre.
- 5) As set out in policy DH2, apply a minimum density standard of 100dph to all non-allocated major residential developments in Camberley Town Centre.

Town Centre Uses

- 6) Protect employment land in Camberley by allocating a Strategic Employment Site at Knoll Road as set out in Policy ER2.
- 7) Protect a retail core by defining and protecting a Primary Shopping Area as defined on the Local Plan Policies Map.
- 8) Encourage a mix of appropriate town centre uses in line with Policy CTCI.

Transport

- 9) Maintain and improve pedestrian and cyclist access on the A30, encouraging sustainable modes of transport and the expansion of the London Road green corridor.
- 10) Promote provision of pedestrian and cyclist access as part of any new major developments in accordance with Policy IN2 and CTC3.
- 11) Work with Surrey County Council to implement highways improvements to the road network in Camberley Town Centre and improve accessibility in and around the town centre in accordance with Policy IN2 and CTC3.



Green Infrastructure and Greenspaces

- 12) Provide protection to greenspaces in the Camberley Town Centre local area as shown on the Local Plan Policies Map, and in accordance with the requirements of Policy IN6.

Community Infrastructure

- 13) Community infrastructure in Camberley will be protected in accordance with Policy IN4.

Deepcut

- 9.35. Deepcut is a rural settlement located southeast of Camberley with a population of around 2,860¹⁶⁸ residents. It lies on the Chobham Ridges, surrounded by woodland and heathland areas which are designated Countryside Beyond the Green Belt. Deepcut's character has been shaped by its strong military heritage, although the extent of the surrounding barracks has reduced since the mid-20th Century. A visually prominent structure in Deepcut is the Garrison Church of St Barbara which lies to the east of Deepcut Bridge Road. The church is a Grade II Listed Building built in 1901 to serve the military regiments at Deepcut and Blackdown Camps.
- 9.36. The Centre contains a limited number of shops and other local services on Deepcut Bridge Road. In light of this and the most recent Retail Survey 2021, it is proposed to designate Deepcut as a neighbourhood parade. An individual retail unit is also located at Swordsman's Road in the Dettingen Park development. Dettingen Park is a relatively recent development completed in 2003, which forms the northerly part of the Deepcut settlement area and was built on the site of the former Alma Dettingen Barracks.

¹⁶⁸ ONS Lower layer Super Output Area population estimates mid-2017:
<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/wardlevelmidyearpopulationestimatesexperimental>



- 9.37. The former Princess Royal Barracks to the east of the existing settlement at Deepcut was identified in the Surrey Heath Core Strategy 2011-2028 as a major strategic housing site, and was allocated to deliver some 1,200 dwellings. The policy for this site is supported by an adopted Supplementary Planning Document (SPD) for Deepcut which sets out more detailed criteria to guide development. Approved design codes have been developed to promote a coherent character for the development. Princess Royal Barracks is currently designated as being located within Countryside beyond the Greenbelt. However, it is proposed to extend the settlement boundary so that the site will become part of Deepcut's wider settlement area, as defined on the Local Plan Policies Map. This settlement extension to Deepcut is now known as Mindenhurst.
- 9.38. Mindenhurst benefits from planning permission for a residential-led scheme providing 1,200 units and community infrastructure granted outline consent in December 2014. The construction of dwellings commenced at the site in 2018, and its development will continue over the lifetime of this Local Plan. The site will deliver the provision of additional amenities for Deepcut, including a primary school, further retail units, and community facilities.
- 9.39. There are limited other opportunities for residential development within Deepcut, as the established settlement area is small and largely developed or subject to greenspace designations. Development will generally be limited to the redevelopment of existing brownfield sites within the settlement area.
- 9.40. Transport connectivity is important for Deepcut, as the settlement is separated from neighbouring towns. There are two bus routes servicing Deepcut which provide access to Frimley Park Hospital and the larger settlements of Camberley, Farnborough, Aldershot and Woking. Deepcut is not within walking distance of a train station or more extensive Town or District Centre facilities.
- 9.41. The Basingstoke Canal, a designated Site of special Scientific Interest (SSSI)¹⁶⁹ and Conservation Area, is located south of the existing Deepcut settlement area, and also adjoins the boundary of the strategic development site of Mindenhurst. The canal towpath provides pedestrian and cyclist access to Frimley Green, Mytchett and other settlements located further away. In addition there are a limited number of local cycle routes at Deepcut Bridge Road and the Dettingen Park development. However, these do not extend to outlying areas, or indeed other areas of Deepcut itself. There are opportunities to extend the cyclist network from Dettingen Park to Deepcut Local Centre, the Basingstoke Canal and also to Heatherside, providing access to the western urban area. A cycle and pedestrian route is also being implemented at Frith Hill, providing access between Deepcut and Frimley.

¹⁶⁹ SSSI: A site designated in the UK to be of importance for nature conservation due to the presence of a rare or good example of fauna and flora.



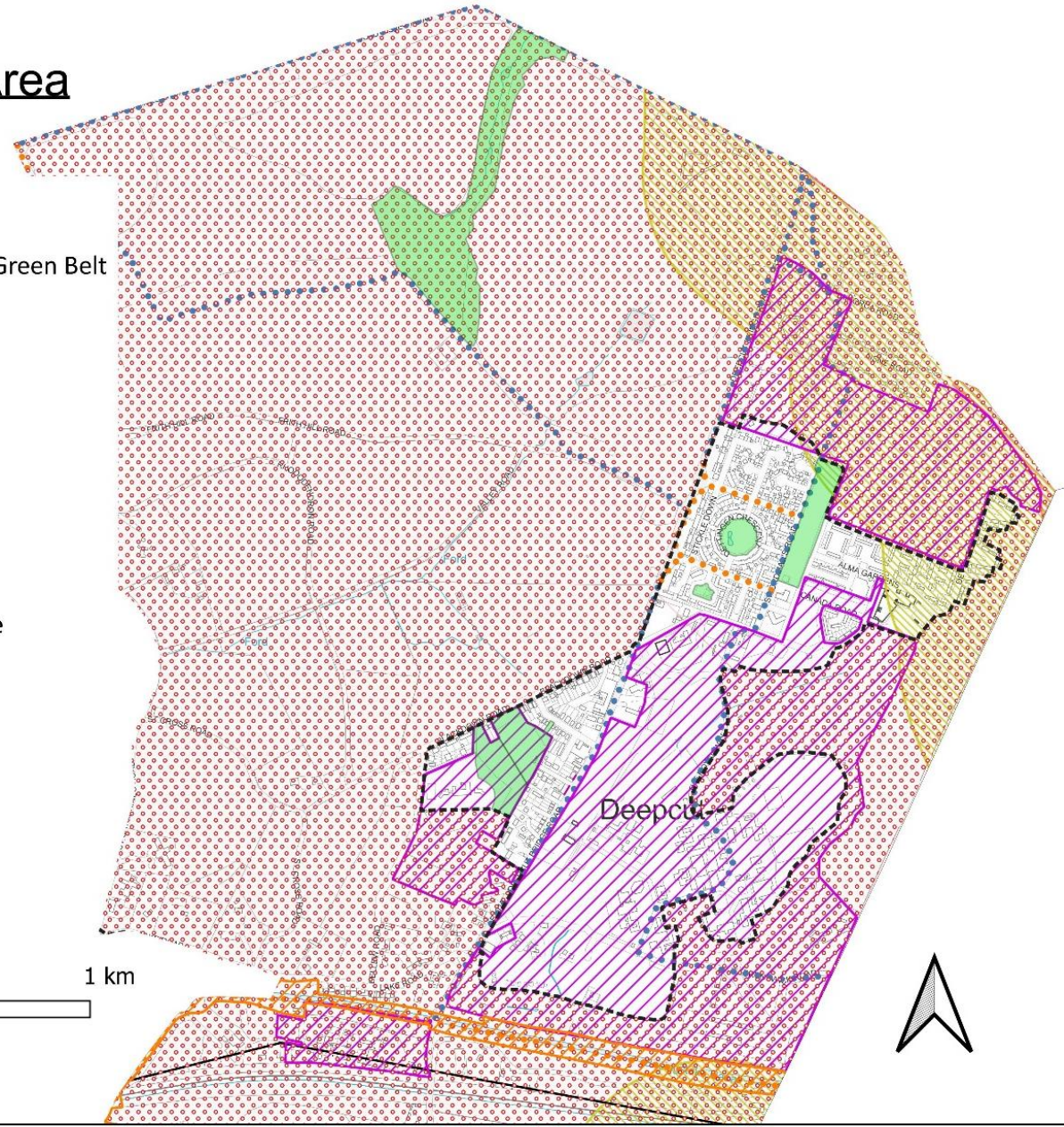
- 9.42. Deepcut is located within the countryside which makes this an accessible resource for pedestrians and cyclists, affording informal recreational opportunities. There is pedestrian access to the nearby localities of Frimley Green and Heatherside via Lake Road and Deepcut Bridge Road respectively. Proposed protected greenspaces in the Deepcut local area provide further opportunities for recreation. There are proposed greenspace designations at Bellew Road Recreation Ground and the adjoining area of woodland to the west. It is also proposed that additional protected greenspaces will be designated in the Dettingen Park area of Deepcut at Alma Dettingen playing fields, the open space in Dettingen Crescent, and the open space and playground at Suffolk Court. This will ensure these areas are retained as protected open spaces. Further greenspaces, including SANG, will be provided as part of the Mindenhurst development.
- 9.43. The Deepcut local area contains a number of Sites of Importance for Nature Conservation (SINCs), including the Frith Hill SINC and Richmond Hill SINC. There are also a number of individual and area Tree Preservation Orders (TPOs) in the local area, including large area TPOs at Frimley Fuel Allotments and in the countryside between the settlement area of Deepcut and St Catherines Road in Frimley Green.
- 9.44. A Neighbourhood Forum has been established to develop a Neighbourhood Plan for Deepcut. The Neighbourhood Plan Area includes the existing settlement area of Deepcut but does not include the strategic site at Mindenhurst. The Deepcut Neighbourhood Plan will need to be in conformity with the strategic approach to Deepcut set out in the adopted Local Plan and in this Local Plan.



Deepcut Local Area

Legend

-  Countryside Beyond the Green Belt
-  Conservation Area
-  Green space
-  SPA 400m buffer
-  Special Protection Area
-  Settlement area
-  Allocated site
-  Railway
-  A road
-  Cycle route (existing)
-  SCC suggested cycle route
-  Neighbourhood Parade



Local Area Principles for Deepcut

Design and Heritage

- 1) Ensure development complements the character of Deepcut by providing good quality development in accordance with design policy DH1 Design Principles
- 2) Ensure development at the allocated site of Mindenhurst is in accordance with the approved design codes for the site and the design guidelines and standards set out the Deepcut Supplementary Planning Document
- 3) Preserve and enhance Deepcut's designated heritage assets and their settings in accordance with heritage Policy DH7, including the Grade II Listed Church of St Barbara, which is a dominant feature in the local area
- 4) Protect Deepcut's non-designated heritage assets where this is practically achievable, in accordance with Policy DH7.

Housing

- 5) Support the continued delivery of the strategic allocated site at Mindenhurst for 1,200 homes and retail and community facilities, in accordance with Policy HA4 and the Deepcut Supplementary Planning Document
- 6) Amend the settlement boundary of Deepcut, extending the settlement area to incorporate the strategic residential-led site at Mindenhurst
- 7) To promote the optimum use of land in sustainable locations apply the minimum density standards set out in Policy DH2 for non-allocated major sites. This policy sets a minimum density standard of 40 dph in Deepcut settlement area.

Employment and Retail

- 8) Update the designation of Deepcut to a Neighbourhood Parade with revised boundaries that take account of the most up-to-date evidence in the Surrey Heath Retail Site Survey 2021, as defined on the Local Plan Policies Map.
- 9) Promote the regeneration of Deepcut Local Centre through the delivery of retail units as part of the approved planning consent at Mindenhurst, and review the retail boundaries of the Neighbourhood Centre following implementation of new retail provision in Deepcut.

Transport

- 10) Seek improvements to the cycle network in Deepcut, promoting better connectivity between Deepcut Local Centre, outlying residential areas and neighbouring settlements.
- 11) Promote provision of pedestrian and cyclist access as part of any new major developments in accordance with Policy IN2.



- 12) Support the continued provision of public transport and highways improvements being delivered as part of the Mindenhurst development.

Green Infrastructure and Greenspaces

- 13) Provide protection to greenspaces in the Deepcut local area as shown on the Local Plan Policies Map, and in accordance with the requirements of Policy IN6.

Community Infrastructure

- 14) Community facilities in Deepcut will be protected in accordance with Policy IN4.

Frimley

- 9.45. Frimley originated as a small, rural heathland community located on the historic London to Portsmouth coach route. Frimley was expanded and redeveloped in the latter 20th Century, although areas of the settlement's original architecture and historical interest remain. Some examples of this can be seen at The Grove, Grove Cross Road, and Field Lane. The settlement now has a population of 17,724¹⁷⁰. Frimley is contiguous with the settlement of Camberley, and Frimley Green, which together with Mytchett form the largest urban area in Surrey Heath, known as the western urban area.
- 9.46. Frimley is home to Frimley Park Hospital which is rated an outstanding hospital by the Care Quality Commission¹⁷¹ and is the Borough's largest employer. The settlement also contains a significant proportion of the Borough's employment areas, including three proposed Strategic Employment Sites at Lyon Way, Albany Park and Frimley Business Park. These three employment areas are located less than 2km from junction 4 of the M3, enabling direct access to the Strategic Road Network.

¹⁷⁰ ONS Ward Level Population estimates mid-2020:

www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/wardlevelmidyearpopulationestimatesexperimental.

¹⁷¹ The Care Quality Commission is the independent regulator of health and social care in England:

<https://www.cqc.org.uk/>.



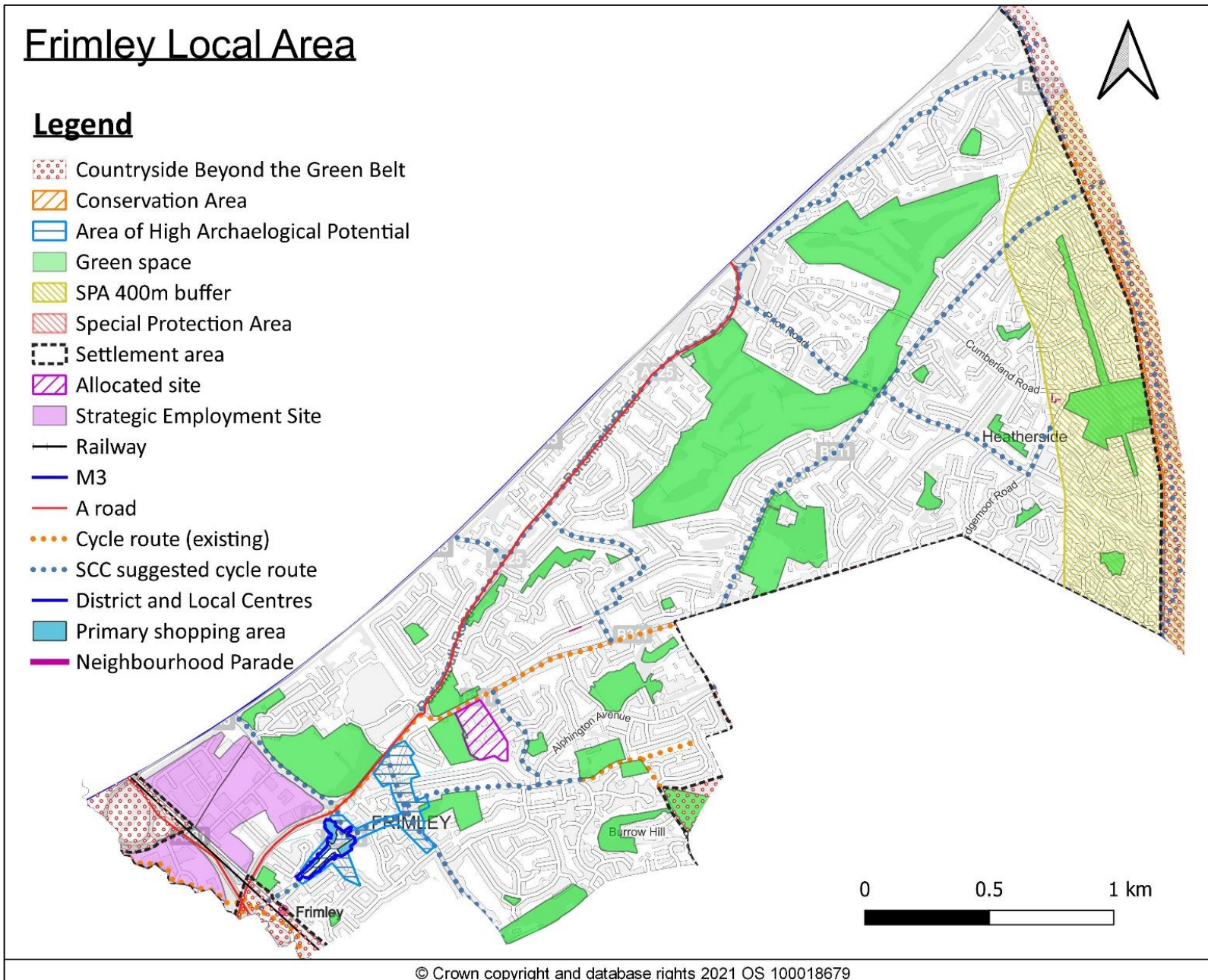
- 9.47. The central area of Frimley at Frimley High Street is identified as a District Centre, and has the second highest concentration of retail and other E use classes in the Borough, following Camberley¹⁷². Frimley High Street has benefited in recent years from an active Frimley Business Association. The District Centre contains a range of uses and serves an important role in Frimley, providing a choice of retailers, local services and employment. There are also identified Neighbourhood Parades in the local area of Frimley at Farm Road, and Heather Ridge Arcade in Heatherside, which provide a smaller range of shops and services for their local communities.
- 9.48. It is recognised that Frimley High Street is dominated by traffic, including vehicles using the route as a short-cut to access the A325 and A331. The High Street would benefit from public realm improvements. In order to facilitate this, the Council will work with partners such as Surrey County Council to seek traffic management opportunities, environmental upgrades, and improvements to the pedestrian network within the High Street.
- 9.49. Frimley is well served by public transport. Frimley Train Station is located adjacent to the District Centre on the Ascot to Guildford line. A number of local bus services serve the area with the majority of bus routes in Frimley stopping at both Frimley District Centre and Frimley Park Hospital. There is also a network of cycle routes within Frimley, offering access within the settlement and to neighbouring areas. Opportunities to improve and extend the cycle network in Frimley will be explored with Surrey County Council, the responsible authority for transport and public rights of way in Surrey Heath.
- 9.50. A significant number of proposed protected greenspaces are located in the Frimley local area including recreation grounds, school playing fields, woodland and SANGs. Frimley Park is a Grade II listed Historic Park and Garden and is the largest heritage designation and in Frimley. The Historic Park and Garden also contains Frimley Park Mansion which is a Grade II Listed Building. Frimley Park and Garden is a National Cadet Training Centre owned by the British Armed Forces which is inaccessible to the public.
- 9.51. The Frimley local area contains two Sites of Importance for Nature Conservation (SINCs); one at Camberley Heath Golf House in the east of the settlement area, and also a small part of the Frimley Hatches SINC to the west of Frimley Station. A number of individual and area Tree Preservation Orders (TPOs) are located within the local area. These include area TPOs throughout much of the Heatherside locality and a large area TPO in the residential area around Buckingham Way, within the southeast of Frimley settlement area.

¹⁷² Retail uses in the Borough recorded in the Surrey Heath Retail Site Survey Paper 2019: <https://www.surreyheath.gov.uk/residents/planning/planning-policy/evidence-base>



- 9.52. Parts of the west of local area are covered by the Environment Agency's Flood Zone 2 and 3 designations and are at risk from flooding. In particular, flood risk arises in the west of the Frimley local area from the Balmoral Ditch.
- 9.53. The Frimley local area includes a concentration of retail uses, employment sites, transport links, and other services within Frimley District Centre or in close proximity of the centre. It is therefore a sustainable location for growth. However, there are limited opportunities within Frimley for future residential development, due to the limited availability of land. Much of the area has already been built on, or is designated as protected greenspace including outdoor recreation grounds and parks. A limited number of brownfield sites provide the greatest opportunity for delivering housing in the area, and development will largely come forward on these brownfield windfall sites.





Local Area Principles for Frimley

Design and Heritage

- 1) Ensure development complements its wider setting, whether Victorian, Edwardian or contemporary in character, by providing good quality development in accordance with design policy DH1 Design Principles, and the Western Urban Area Character Supplementary Planning Document
- 2) Preserve and enhance Frimley's designated heritage assets, and their setting, including the Grade II Listed Historic Park and Garden at Frimley Park in accordance with heritage Policy DH7
- 3) Protect Frimley's non-designated heritage assets where this is practically achievable, in accordance with Policy DH7.

Housing

- 4) To promote the optimum use of land in sustainable locations apply the minimum density standards set out in Policy DH2 for non-allocated major sites. This policy sets a higher density standard close to Frimley train station of 70 dph and a lower minimum density standard of 40 dph in the rest of the Frimley settlement area.

Employment and Retail

- 5) Recognise the importance of Frimley Park Hospital as a local employer and NHS Foundation Trust serving patients in Surrey Heath and outlying areas through providing protection for the continued use of the site as a hospital, as set out in ER6.
- 6) Protect employment land in Frimley by allocating Strategic Employment Sites, including Frimley Business Park, as defined on the Local Plan Policies Map.
- 7) Retain the designation of Frimley as a District Centre, with revised boundaries that take account of the most up-to-date evidence in the Surrey Heath Retail Site Survey 2021, as defined on the Local Plan Policies Map.
- 8) Retain the designation of identified Neighbourhood Parades at Farm Road and Heather Ridge Arcade as defined on the Local Plan Policies Map

Transport

- 9) Maintain and improve pedestrian and cyclist access from Strategic Employment Sites to Frimley District Centre, encouraging sustainable modes of transport and improving footfall and lunch time and after work retail trade within the District Centre.
- 10) Promote provision of pedestrian and cyclist access as part of any new major developments in accordance with Policy IN2



- 11) Seek to secure public realm improvements for Frimley High Street, also working with Surrey County Council to provide traffic management upgrades, in accordance with Policy IN2.

Green Infrastructure and Greenspaces

- 12) Provide protection to greenspaces in the Frimley local area as shown on the Local Plan Policies Map, and in accordance with the requirements of Policy IN6.

Community Infrastructure

- 13) Community facilities in Frimley will be protected in accordance with Policy IN4.

Frimley Green

- 9.54. Frimley Green is located to the south of the neighbouring settlement of Frimley. Whilst it is contiguous with the wider western urban area, Frimley Green benefits from its own distinct identity at its core, with a village green setting. The settlement has a population of around 6,771 residents¹⁷³.
- 9.55. A key asset of Frimley Green is the protected greenspace at its centre, which provides an attractive setting and focal point, contributing to the identity of the settlement. This is bounded by mature trees which add to the setting and character of the area. Future management of The Green open space should seek to include replacement planting for the mature trees that contribute to the unique character of the area should any required felling take place, in accordance with Policy DH5. There are also some Grade II listed buildings within the settlement area of Frimley Green and in the surrounding countryside, although none directly adjoin its central greenspace.
- 9.56. Frimley Green contains a designated Local Centre comprising a range of shops and services, clustered around The Green, Frimley Green Road, Wharf Road, Sturt Road and Guildford Road. In addition, an identified Neighbourhood Parade at Beaumaris Parade on Balmoral Drive provides a smaller range of shops and services for the local community.

¹⁷³ ONS Ward Level Population estimates mid-2020:
www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/wardlevelmidyearpopulationestimatesexperimental.



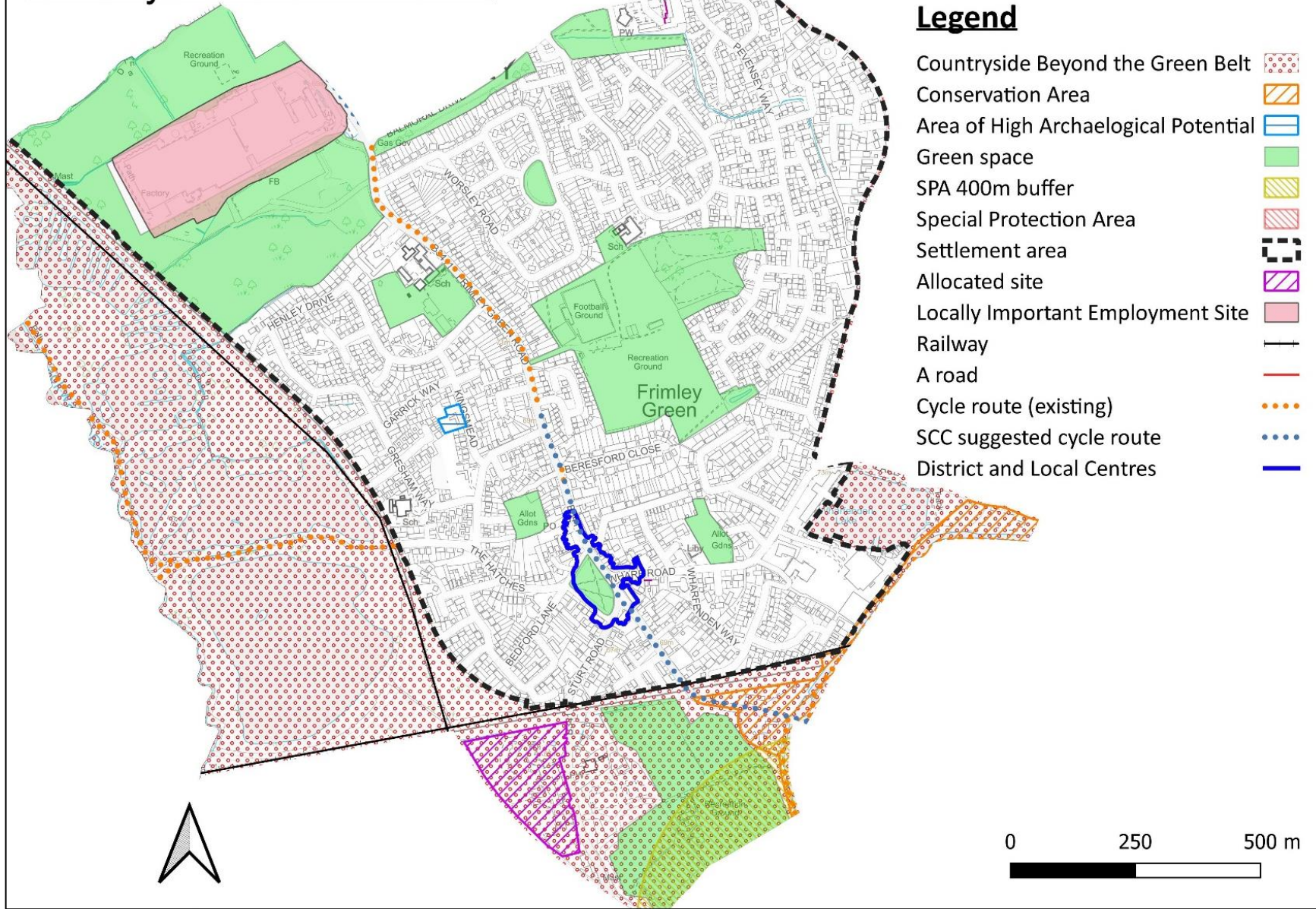
- 9.57. Frimley Green does not have a rail service, although the area is bisected by two rail lines. Land at Sturt Chord remains safeguarded for its potential to provide future rail access from the Ascot to Guildford line to the London Waterloo to Southampton mainline. There is pedestrian and cyclist access from Frimley Green Centre to Farnborough North Station in Rushmoor Borough, which is approximately 1km distance away. Parts of Frimley Green Road have a shared cyclist and pedestrian route and it is considered that there are opportunities to extend the cycle route so it links Frimley Green to Frimley Centre, which would provide access to other neighbouring areas. Three bus routes that service Frimley Green, providing access to larger settlements including Camberley, Farnborough and Aldershot.
- 9.58. Frimley Green is home to SC Johnson which is proposed to be allocated as a Locally Important Employment Site. Although SC Johnson's manufacturing use is not fully operational, the offices at the site are still in use. The site also contains the largest area of protected greenspace in the settlement area of Frimley Green, but as the site is privately owned, this is largely inaccessible to the public.
- 9.59. Frimley Lodge Park is a key asset of Frimley Green which is located in Countryside Beyond the Green Belt to the south of the settlement area. Frimley Lodge is a Council owned Green Flag Park which offers formal and informal recreational facilities and events. The Park allows accessibility to the Basingstoke Canal which is a designated Site of Special Scientific Interest (SSSI) and Conservation Area to the southeast of Frimley Green. The Canal provides further recreation opportunities and the towpath alongside the Canal enables pedestrian and cyclist access to the nearby settlements of Mytchett and Deepcut.
- 9.60. A number of proposed protected greenspaces are located throughout the Frimley Green settlement area. These include allotment gardens, school playing fields, informal open spaces within residential areas and the larger greenspaces at SC Johnson and Frimley Recreation Ground. Frimley Green Recreation Ground is a valuable resource, providing a large greenspace surrounded by residential areas, close to the centre of the settlement. It has a wide range of recreational facilities including a children's play area, football pitches, a cricket pitch and tennis courts. The area also contains areas of parkland and woodland.
- 9.61. The Frimley Green local area contains one Site of Importance for Nature Conservation (SINC) at the Frimley Hatches SINC in the west of the local area. There are a number of individual and area Tree Preservation Orders (TPOs) in Frimley Green. These include area TPOs around Wharfenden Lake in the southeast of the local area, and in the residential area around Henley Drive in the west of the Frimley Green settlement area.



- 9.62. To the west of Frimley Green are a number of lakes which were created following gravel extraction. Some areas in the north and west of Frimley Green are affected by flooding from the River Blackwater and its tributaries, including the Balmoral Ditch. These areas lie within Flood Zones 2 and 3.
- 9.63. Frimley Green is a relatively sustainable location for residential development due to its range of shops and services, the availability of public transport, and its proximity to the District Centre of Frimley which has a more extensive range of facilities. Housing in Frimley Green will be primarily delivered through the redevelopment of existing brownfield sites within the settlement area. In addition, the previously developed site at Land West of Sturt Road which is currently designated as Countryside beyond the Green Belt will be allocated for residential development. The site will be incorporated within the settlement boundary of Frimley Green, as identified on the Local Plan Policies Map.



Frimley Green Local Area



Local Area Principles for Frimley Green

Design and Heritage

- 1) Ensure development complements the late Victorian and Edwardian character of Frimley Green, providing good quality development in accordance with design Policy DH1 Design Principles, and the Western Urban Area Character Supplementary Planning Document
- 2) Preserve the village green setting at the centre of Frimley Green by re-designating the area of open space known as The Green as a protected greenspace.
- 3) Preserve and enhance Frimley Green's designated heritage assets and their settings, in accordance with heritage Policy DH7
- 4) Protect Frimley Green's non-designated heritage assets where this is practically achievable, in accordance with Policy DH7.

Housing

- 5) To promote the optimum use of land in sustainable locations apply minimum density standards set out in Policy DH2 for non-allocated major sites. This policy sets a minimum density standard of 40 dph in the Frimley Green settlement area.

Employment and Retail

- 6) Protect employment land in Frimley Green by allocating SC Johnson as a Locally Important Employment Site as defined on the Local Plan Policies Map
- 7) Retain the designation of Frimley Green as a Local Centre, with revised boundaries that take account of the most up-to-date evidence in the Surrey Heath Retail Site Survey 2021, as defined on the Local Plan Policies Map
- 8) Retain the designation of Beaumaris Parade as an identified Neighbourhood Parade in the Frimley Green local area, as defined on the Local Plan Policies Map

Transport

- 9) Safeguard Sturt Chord for potential future development of a rail link from the Ascot to Guildford line to the London Waterloo to Southampton mainline, as set out in Transportation Policy IN2
- 10) Seek improvements to the cycle network in Frimley Green, promoting better connectivity between Frimley Green Local Centre, outlying residential areas and neighbouring settlements
- 11) Promote provision of pedestrian and cyclist access as part of any new major developments in accordance with Policy IN2
- 12) Support the provision of public transport and highways improvements within the area in accordance with Policy IN2.



Green Infrastructure and Greenspaces

- 13) Provide protection to greenspaces in the Frimley Green local area as shown on the Local Plan Policies Map, and in accordance with the requirements of Policy IN6.

Community Infrastructure

- 14) Community facilities in Frimley Green will be protected in accordance with Policy IN4.

Mytchett

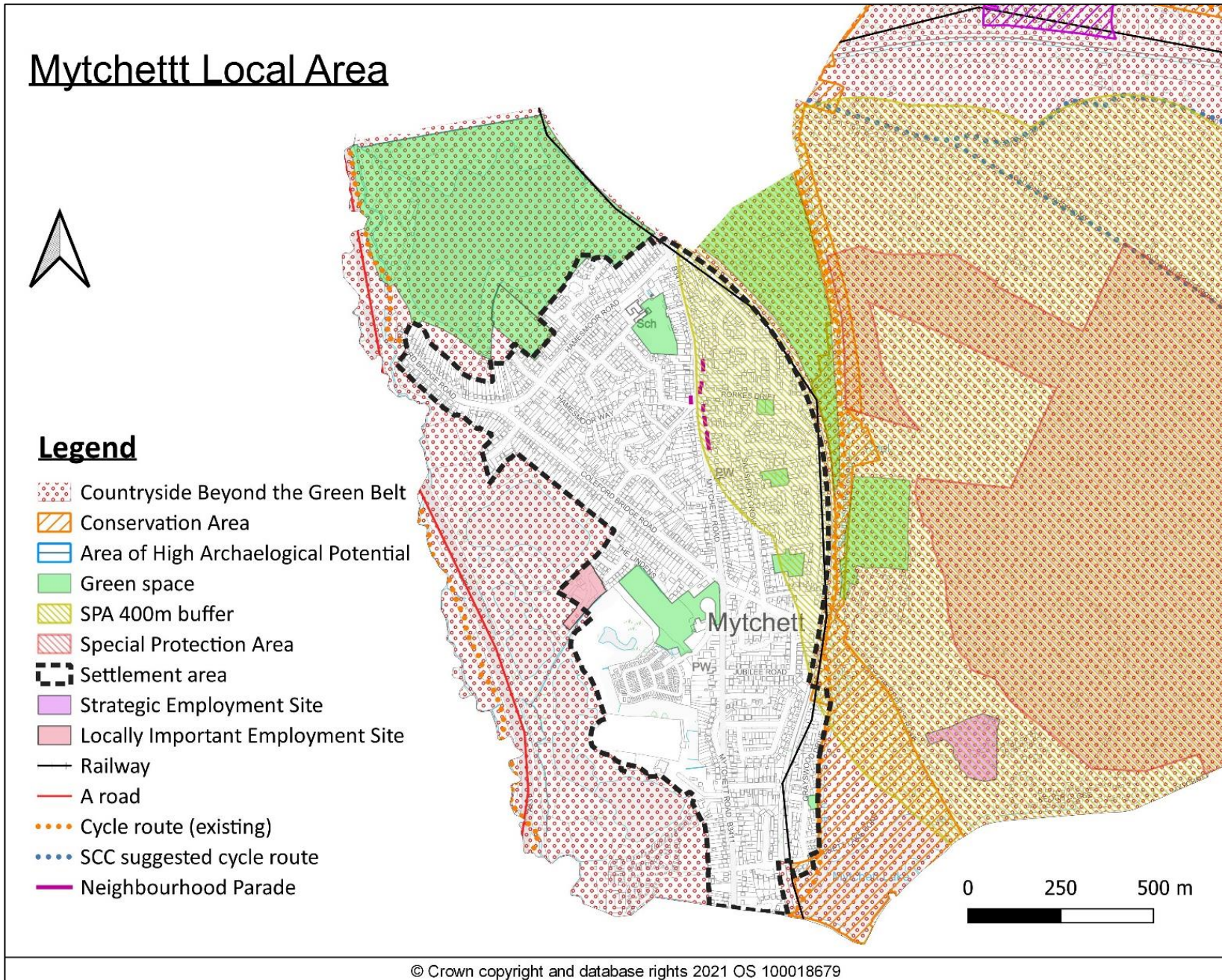
- 9.64. Mytchett is located to the south of Frimley Green and is the most southerly settlement in Surrey Heath. Mytchett forms the southern extent of the western urban area in Surrey Heath, made up of Camberley, Frimley, Frimley Green and Mytchett. The majority of residential development was built between 1945 and 1980. Much of the housing development fronting Mytchett Road, Hamesmoor Road and Coleford Bridge Road was built between WW1 and WW2 and during post war regeneration. The local area of Mytchett has a population of around 4,610¹⁷⁴ residents.
- 9.65. The Basingstoke Canal, designated in 1985, its conservation area and the Mytchett Lakes are defining features of the area. The general form of the Basingstoke Canal Conservation Area is linear, taking in the Canal and its immediate banks and towing paths and back-up tree belts, with the area extended to nearby physical features which provide an identifiable boundary or where features appear to be visually important to the character of the Canal.
- 9.66. The settlement boundary of Mytchett is bordered by the Countryside beyond the Greenbelt. The Thames Basin Heaths Special Protection Area is situated directly east of Mytchett, beyond the Guildford to Ascot Railway and the Basingstoke Canal SSSI, and its 400m buffer zone covers a large area of the settlement to the east of Mytchett Road. The Blackwater River and A331 form the western boundary of Mytchett, with some areas of Mytchett lying within flood zone 2 and 3. Areas of Mytchett are also within the Farnborough Airport public safety zone. Consequently, opportunities for residential development are limited within Mytchett. Two Mobile Home sites are located in Mytchett and the retention of these sites is supported.

¹⁷⁴ ONS Lower layer Super Output Area population estimates mid-2017:
<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/wardlevelmidyearpopulationestimatesexperimental>.



- 9.67. Mytchett contains a designated neighbourhood parade which is linear in nature and formed by a cluster of retail units located on Mytchett Road. A small cluster of employment sites are located to the south of the neighbourhood parade, including Mytchett Garage. Mytchett contains some of the Borough's employment areas, including the proposed Locally Important Employment Site at Linsford Business Park and the proposed Strategic Employment Site at Frazer Nash.
- 9.68. Ash Vale is the nearest rail station and provides access to Woking and London Waterloo. North Camp station is also located nearby and provides services to Reading and Guildford. Mytchett is well served by local bus services, including the Aldershot to Camberley service, with the majority of services stopping within the neighbourhood centre. The Basingstoke Canal cycle route links Mytchett to Ash Vale to the South and Brookwood to the east, linking to wider cycle routes in Woking, Guildford and Waverley. There are also links to the Blackwater Valley cycle path, connected to the wider network in Hampshire. Opportunities to improve and extend the cycle network in Mytchett will be explored with Surrey County Council, the responsible authority for transport and public rights of way in Surrey Heath.
- 9.69. Mytchett Local Area contains a number of protected greenspaces, including recreation grounds and amenity open spaces. Mytchett Place House on the Frazer Nash site is the only locally listed building in the Mytchett local area. The area is well treed and there are a number of area and individual TPOs in Mytchett, especially towards the south of the settlement. Parts of Mytchett are subject to nature conservation designations, with a number of Sites of Importance for Nature Conservation (SINCs) including Mytchett Mere SINC and Coleford Bridge SINC.





Local Area Principles for Mytchett

Design and Heritage

- 1) Ensure residential development complements the character of Mytchett by providing good quality development in accordance with design policy DH1 Design Principles, and the Western Urban Area Character Supplementary Planning Document.
- 2) Preserve Mytchett's non-designated heritage assets where this is practically achievable, in accordance with Policy DH7.
- 3) Within the Basingstoke Canal Conservation Area, in particular taking account of the Canal, its immediate banks and towing paths and its extension to nearby physical features which provide an identifiable boundary, any signage should respect the character of the designated area.

Housing

- 4) Amend the settlement boundary of Mytchett to incorporate the site at Water's Edge within the settlement area.
- 5) To promote the optimum use of land in sustainable locations apply the minimum density standards set out in Policy DH2 for non-allocated major sites. This policy sets a minimum density standard of 40 dph in the Mytchett settlement area.

Employment and retail

- 6) Protect employment land in Mytchett by allocating the Frazer Nash site as a Strategic Employment Site and Linford Business Park as a Locally Important Employment Site, in accordance with Policy ER2 and ER3.
- 7) Retain the designation of Mytchett Neighbourhood Parade as defined on the Local Plan Policies Map.

Transport

- 8) Support opportunities to improve access to the Basingstoke canal and to other water areas as a leisure opportunity.
- 9) Encourage improvements to the Sustrans cycle network along the Basingstoke Canal and connectivity between the Basingstoke Canal and Blackwater Valley cycle paths.
- 10) Promote provision of pedestrian and cyclist access as part of any new major developments in accordance with Policy IN2.
- 11) Support the provision of public transport and highways improvements within the area in accordance with Policy IN2.



Green Infrastructure and Greenspaces

- 12) Provide protection to greenspaces in the Mytchett local area as shown on the Local Plan Policies Map, and in accordance with the requirements of Policy IN6.

Community Infrastructure

- 13) Community facilities in Mytchett will be protected in accordance with Policy IN4.



East of the Borough

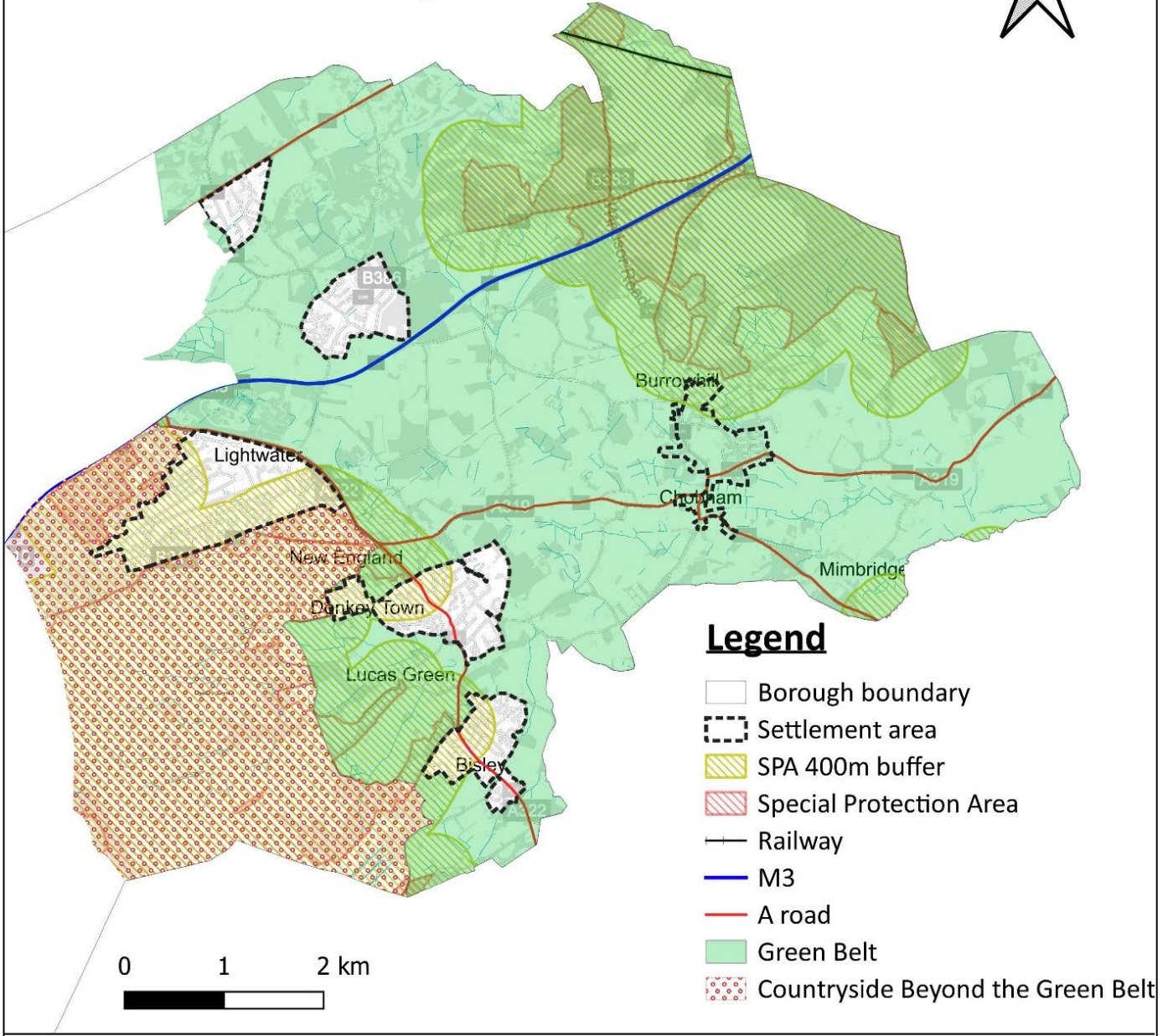
- 9.70. The east of the Borough is predominantly rural. There are five local areas in the east of Surrey Heath which include the settlement areas of Bisley, Chobham, Lightwater, West End and Windlesham. The villages of Lightwater, West End and Bisley are located along the A322 Guildford Road which runs north to south through the Borough. The three settlements are separated by small areas of Green Belt and Countryside beyond the Green Belt land. It is important that the gaps between these settlements are maintained, as well as the gap between Bisley and the nearby settlement of Knaphill in Woking Borough, in order to prevent coalesce of the individual settlements.
- 9.71. The settlements of Windlesham and Chobham are located within the Green Belt and have rural settings. Windlesham has two separately defined settlement areas which are both inset within the Green Belt. The more southerly of these is based around the centre of the village of Windlesham, which is located at Updown Hill. The northerly settlement area is at Snows Ride which is a more recent development than its southern neighbour, and is almost entirely residential.
- 9.72. Windlesham has two Conservation Areas. Windlesham Updown Hill Conservation Area is located in the southerly settlement area of Windlesham and the Windlesham Church Road Conservation Area is located within Green Belt land around Church Road and Kennel Lane, outside of the settlement areas. There is also a Conservation Area at the centre of Chobham Village. The village centre of Chobham is designated as a Conservation Area and retains many of its old buildings and much of its historic character. In particular, Chobham High Street contains the highest concentration of listed buildings in the Borough. The settlement area of Chobham is entirely washed over by Green Belt.
- 9.73. A number of employment sites are located throughout the east of the Borough in rural locations. These include the former Defence Evaluation and Research Agency site at Longcross near Chobham and Fair Oaks Airport in the far east of the Borough, Eli Lilly in Windlesham and the former British Oxygen Company site near Valley End. All these sites are proposed for designation as employment sites within the Green Belt, which retain their Green Belt washes.



- 9.74. The eastern part of Surrey Heath is characterised by Green Belt and some small areas of Countryside beyond the Green Belt. The countryside to the south of Lightwater is heathland which is part of the designated Thames Basin Heaths Special Protection Area. The Green Belt land at Chobham Common in the far east of the Borough is an area of heathland also designated Special Protection Area. In addition, both heathland areas also form part of the Thursley, Ash, Pirbright and Chobham Special Area of Conservation. Other rural areas in the east of the Borough comprise large areas of open pasture land, woodland and the watercourse valleys of the Windlebrook/Halebourne/Addlestone and The Bourne. There are extensive low lying meadowlands mostly surrounding Chobham.
- 9.75. Overall, there are limited opportunities for development in the east of Surrey Heath. This is largely due to the majority of land being designated as Green Belt, and the presence of heathland areas which are dually designated Special Protection Areas and Special Areas of Conservation. The spatial strategy therefore directs the majority of development to the west of the Borough, which is the most sustainable approach for delivering future development in Surrey Heath.
- 9.76. The previously allocated housing reserve sites at West End and Windlesham have now received planning permission, with the delivery of dwellings having commenced in West End. It is expected that the remainder of these permitted sites will be built out over the plan period.



East of the Borough



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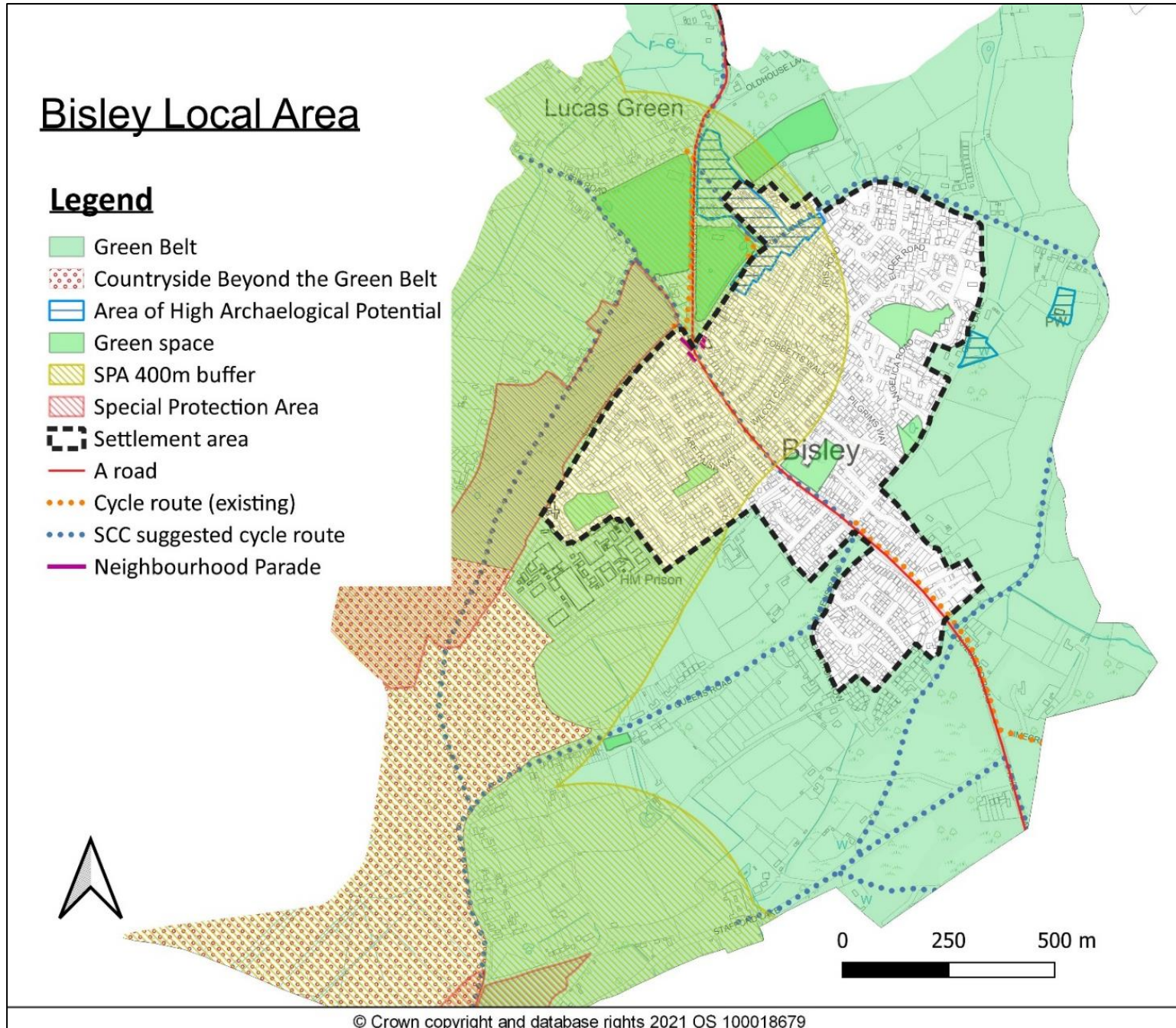
Bisley

- 9.77. Bisley is the most southerly ward in the east of the Borough, adjoining Woking Borough Council to the southeast. The village is famous for the National Rifle Association (NRA) championships which moved there in 1890, a competition hosted by the NRA on the Bisley Ranges which is Ministry of Defence land. Bisley has hosted shooting events for the 1908 Olympic Games and the 2002 Commonwealth Games. The population of Bisley is now around 4,000 people. A large proportion of housing development in Bisley has been built since 1979, although a number also originate from post war regeneration, much of which is characterised by semi-detached housing. Housing affronting the A322 and Queens Road were built between WWI and WW2.
- 9.78. The settlement area of Bisley is surrounded by the Metropolitan Green Belt and much of the village of Bisley lies within the Thames Basin Heaths SPA 400m buffer zone and as such opportunities for residential development are limited. Areas of the heathland extend into the settlement area and adjoin the designated Common Land at Bisley Village Recreation Ground. The Recreation Ground and adjoining Common Land at Church Lane contribute to the green and treed character of the village. Future management of this land should seek to include replacement planting for the trees that flank the open space at Guildford Road, which contribute to the unique character of the area should any required felling take place, in accordance with Policy DH5.
- 9.79. It is considered that development in Bisley will largely come forward on brownfield and windfall sites outside the 400m buffer zone, over the plan period. It is also possible that housing could be delivered at rural exception sites within the Green Belt, subject to there being a demonstrable local need for this type of development, and proposals meeting the criteria in Policy H9.
- 9.80. The A322 Guildford Road bisects Bisley from north to south and is a major route between Surrey and Berkshire, running north to south towards Bracknell and Guildford respectively. It is recognised that traffic is prevalent on the A322, especially during peak hours.
- 9.81. Bisley is designated as a neighbourhood parade which is characterised by a small number of retail units to the south of the A322, Church Road Roundabout. Bisley is home to the Coldingley Prison, a large employer in the area, which is a category C training Prison that remains operational and was originally opened in 1969.



- 9.82. There is limited public transport in Bisley, however the local area is relatively well served by bus services, including the Guildford, Woking and Camberley service. The closest railway station is Brookwood to the south of Bisley, which has frequent direct services to London. Cycle links between Bisley and Brookwood are fragmented. An established cycle route runs along the A322 in Bisley, linking the local area to Woking's cycle network, but the route is fragmented. Opportunities to improve and extend the cycle network in Bisley will be explored with Surrey County Council, the responsible authority for transport and public rights of way in Surrey Heath.
- 9.83. Bisley contains a number of statutory and locally listed buildings, including Clews Farm House and Springfield Cottage. In addition, there are three areas to the east of Bisley identified as Areas of High Archaeological Potential. A number of protected greenspaces are situated in the Bisley local area including amenity open spaces, Bisley football club and school playing fields. The area has several individual and group TPOs, including in the Snowdrop Way and the South Road area. Bisley Village Green is designated a SINC and there also SINC to the South of the Local area, including Bisley Common.





Local Area Principles for Bisley

Design and Heritage

- 1) Ensure development complements the character of Bisley by providing good quality development in accordance with design policy DH1 Design Principles
- 2) Conserve the open green setting of Bisley Village which is particularly recognisable at the northern edge of the settlement area, by ensuring continued preservation of the designated Bisley Village Recreation Ground and the adjoining Land at Church Lane.
- 3) Preserve and enhance Bisley's designated heritage assets, and their setting, particularly the Grade II* listed Church of St John the Baptist and the Grade II buildings on Church Lane, Clews Lane and Shaftesbury Road, in accordance with heritage Policy DH7
- 4) Protect Bisley's non-designated heritage assets where this is practically achievable, in accordance with Policy DH7.

Housing

- 5) To promote the optimum use of land in sustainable locations apply the minimum density standards set out in Policy DH2 for non-allocated major sites. This policy sets a minimum density standard of 30 dph in Bisley settlement area
- 6) Recognise that there may be potential opportunities for rural exception sites subject to any proposed development meeting identified needs and other criteria set out in Policy H9.

Employment and Retail

- 7) Retain the neighbourhood parade in Bisley, as defined on the Local Plan Policies Map and set out in Policy ER9.

Transport

- 8) Maintain and improve pedestrian and cyclist access on the A322, encouraging sustainable modes of transport.
- 9) Promote provision of pedestrian and cyclist access as part of any new major developments in accordance with Policy IN2
- 10) Support the provision of public transport and highways improvements within the area in accordance with Policy IN2.

Green Infrastructure and Greenspaces

- 11) Provide protection to greenspaces in the Bisley local area as shown on the Local Plan Policies Map, and in accordance with the requirements of Policy IN6.



Community Infrastructure

- 12) Community facilities in Bisley will be protected in accordance with Policy IN4.

Chobham

- 9.84. Chobham is an historic settlement located in the east of the Borough. The wider local area beyond Chobham Village is rural Green Belt land that is interspersed with individual properties and small clusters of housing. Chobham Common is located to the north of Chobham Village and is a Special Area of Conservation (SAC) that also forms part of the Thames Basin Heaths Special Protection Area. The local area of Chobham has a population of around 3,880¹⁷⁵.
- 9.85. The centre of Chobham Village is visually compact. The architectural and heritage interest of the village can be seen in the concentration of listed buildings clustered around the High Street, which is a defining feature of the settlement. Chobham High Street itself benefits from these largely intact series of historic buildings interspersed with views of the surrounding rural area.
- 9.86. The Chobham Village Conservation Area encompasses the centre of the village and adjoining areas, including residential properties and open greenspaces beyond the village's settlement boundary. There are 28 statutory listed buildings within the Conservation Area of which 27 are Grade II Listed. There is also the Grade I Listed Church of St Lawrence. In addition, there are a significant number of statutory listed buildings throughout the wider Chobham local area, in predominantly rural locations.
- 9.87. The local area of Chobham contains three employment sites which are proposed for allocation. The former British Oxygen Company site and former Defence Evaluation and Research Agency site are proposed Strategic Employment Sites. The former British Oxygen Company site is located in the northwest of the Chobham local area, near Windlesham, and the former Defence Evaluation and Research Agency is located in the northeast of the Chobham Local Area, at Longcross.

¹⁷⁵ ONS ward level population estimates mid-2017:

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/wardlevelmidyearpopulationestimatesexperimental>



- 9.88. Fair Oaks Airport lies to the east of Chobham village, close to Surrey Heath's administrative boundary with Runnymede and Woking Boroughs and is a proposed Locally Important Employment Site. In addition to its established use as an airport, Fair Oaks is also home to a number of businesses, including commercial employers associated with the general aviation industry.
- 9.89. The village centre of Chobham is identified as a Local Centre. Chobham High Street offers a range of retail uses including shops that service day-to-day needs and more specialist antique and boutique style shops. In addition, the centre contains a range of restaurants and other local amenities. Overall, the Centre benefits from its attractive historic setting and shows good vitality and viability, with a large proportion of units in a retail use and a very low number of vacant units, according to the Retail Site Survey Paper 2021. An identified Neighbourhood Parade is located at Chertsey Road, which is in the east of the Chobham settlement area. This provides a smaller range of shops and services for the local community.
- 9.90. Chobham is served by limited public transport. A limited number of bus routes provide connectivity to nearby areas including other small settlements in the east of Surrey Heath and the larger town of Woking, to the southeast of Chobham. Woking station is located 5km from Chobham Village and provides fast and frequent services to London. A train station is situated adjacent to the Chobham local area, at Longcross in Runnymede. This station is located some 5km to the north of Chobham Village and has very limited train services to London.
- 9.91. Currently there are no designated cycle routes in Chobham, and therefore the local area is disconnected from the wider cycle network. Opportunities to introduce cycle and pedestrian routes in Chobham that also provide connectivity to nearby settlements, will be explored with Surrey County Council, the responsible authority for transport and public rights of way in Surrey Heath.
- 9.92. With the exception of Chobham Village which is proposed to be inset from the Green Belt, the entire local area of Chobham is within the Metropolitan Green Belt, providing excellent accessibility to the countryside for informal recreation opportunities. In addition, proposed protected greenspaces are situated within the local area. These are located within or adjoining the settlement area of Chobham and include recreation grounds, allotments, Chobham Water Meadows SANG and Chobham Cemetery. Chobham Water Meadows is a 23.5 hectare SANG that is accessible from the village centre of Chobham. The Chobham local area also contains a number of Sites of Importance for Nature Conservation (SINCs) including Burrow Hill Green SINC.



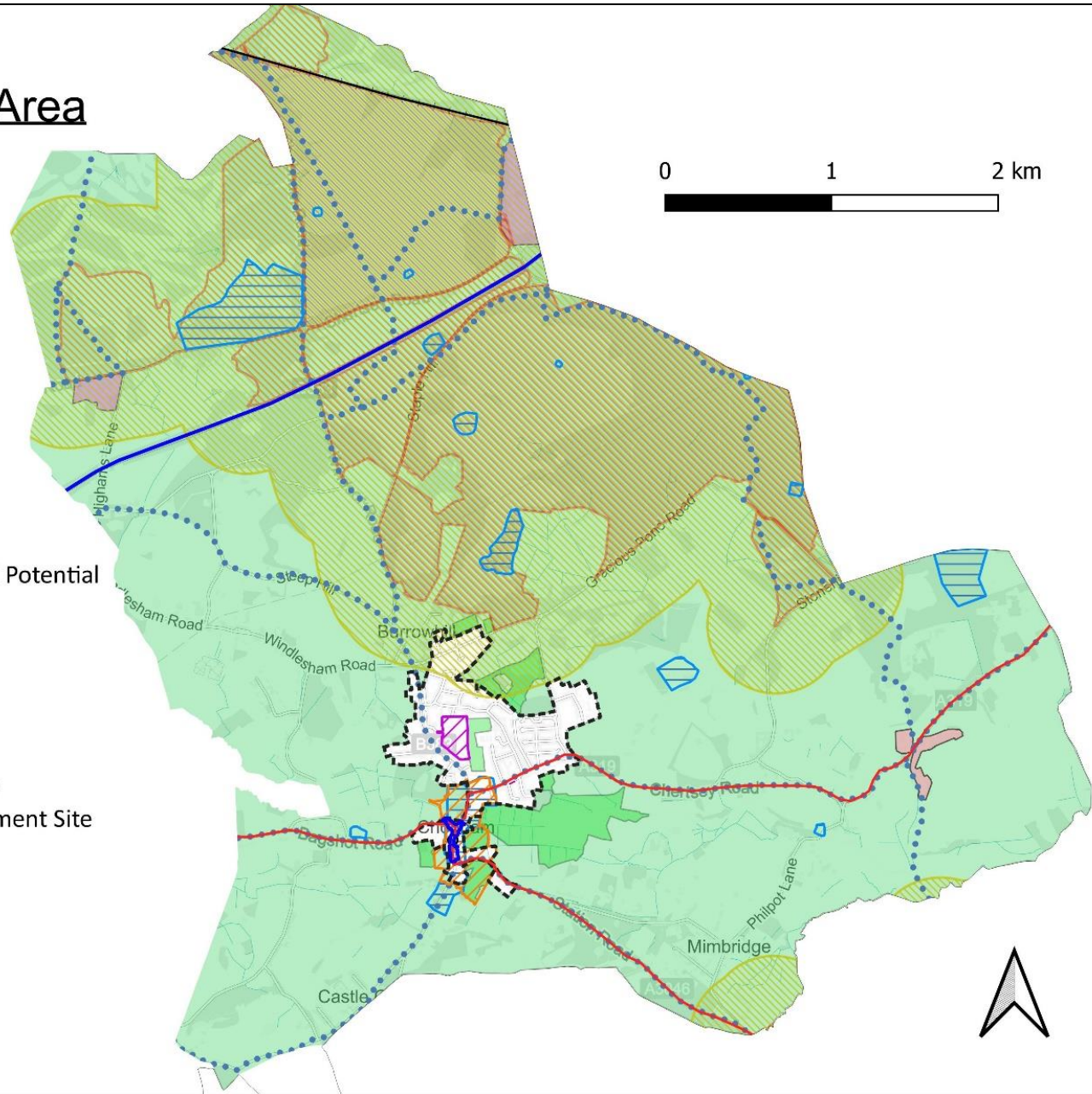
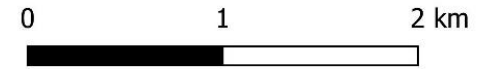
- 9.93. Parts of the local area are covered by the Environment Agency's Flood Zone 2 and 3 designations and are at risk from flooding. In particular, flood risk arises in the Chobham local area from the Millbourne. In addition, some areas are impacted by surface water flooding. Flood mitigation measures are being implemented within some of the affected areas, to alleviate the impacts of flooding.
- 9.94. The potential for residential development within this area is very limited as a consequence of the majority of the local area being designated Green Belt land. However, housing in Chobham will be primarily delivered through the redevelopment of existing previously developed sites within the settlement area of Chobham which provides the greatest opportunity for delivering housing in the area. In addition, housing could be delivered at rural exception sites within the Green Belt, subject to there being a demonstrable need for this type of development, and proposals meeting the criteria in Policy H9. Overall, it is considered that a limited amount of development in Chobham will therefore largely come forward on small previously developed or windfall sites together with some possible rural exception sites, over the plan period.
- 9.95. Chobham Parish Council is developing a Neighbourhood Plan for Chobham. The designated neighbourhood area covers the entire parish of Chobham which has the same geographic scope as the Chobham local area referred to in this profile. The Chobham Neighbourhood Plan will need to be in conformity with the strategic approach to Chobham set out in the adopted Local Plan and in this Local Plan.



Chobham Local Area

Legend

- Green Belt
- Conservation Area
- Area of High Archaeological Potential
- Green space
- Special Protection Area
- SPA 400m buffer
- Settlement area
- Allocated site
- Strategic Employment Site
- Locally Important Employment Site
- Railway
- M3
- A road
- Cycle route (existing)
- SCC suggested cycle route
- District and Local Centres
- Neighbourhood Parade



Local Area Principles for Chobham

Design and Heritage

- 1) Ensure development complements the historic character of Chobham Village and local area, which has a prevalence of surviving pre-19th Century Listed Buildings at its centre, by providing good quality development in accordance with design policy DHI Design Principles.
- 2) Preserve and enhance Chobham's designated heritage assets, and their setting in accordance with Policy DH7, including Chobham Village Conservation Area and the listed buildings in Chobham High Street and throughout the local area.
- 3) Within Chobham Village Conservation Area the design of shop fronts and signage should respect the character of the designated area, particularly its central core along the High Street.
- 4) Protect Chobham's non-designated heritage assets where this is practically achievable, in accordance with Policy DH7.

Housing

- 5) Ensure development sites that come forward within Chobham Village Conservation Area reflect the historic character of the village
- 6) Recognise that there may be potential opportunities for rural exception sites subject to them meeting identified needs and other criteria set out in Policy H9.

Employment and Retail

- 7) Protect employment land in Chobham by allocating Strategic Employment Sites at the former British Oxygen Company site near Valley End and the former Defence Evaluation and Research Agency site, Longcross, and allocating Fair Oaks Airport as a Locally Important Employment Site as defined on the Local Plan Policies Map and set out in Policies ER2 and ER3.
- 8) Retain the designation of Chobham as a Local Centre, with revised boundaries that take account of the most up-to-date evidence in the Surrey Heath Retail Site Survey 2019, as defined on the Local Plan Policies Map.
- 9) Retain the designation of the designated Neighbourhood Parade in Chertsey Road, Chobham, as defined on the Local Plan Policies Map.

Transport

- 10) Seek to introduce a cycle network within the Chobham local area, promoting better connectivity between Chobham Village and neighbouring settlements.
- 11) Promote provision of pedestrian and cyclist access as part of any new major developments in accordance with Policy IN2.



- 12) Support the provision of public transport and highways improvements within the area in accordance with Policy IN2.

Green Infrastructure and Greenspaces

- 13) Provide protection to greenspaces in the Chobham local area as shown on the Local Plan Policies Map, and in accordance with the requirements of Policy IN6.

Community Infrastructure

- 14) Community facilities in Chobham will be protected in accordance with Policy IN4.

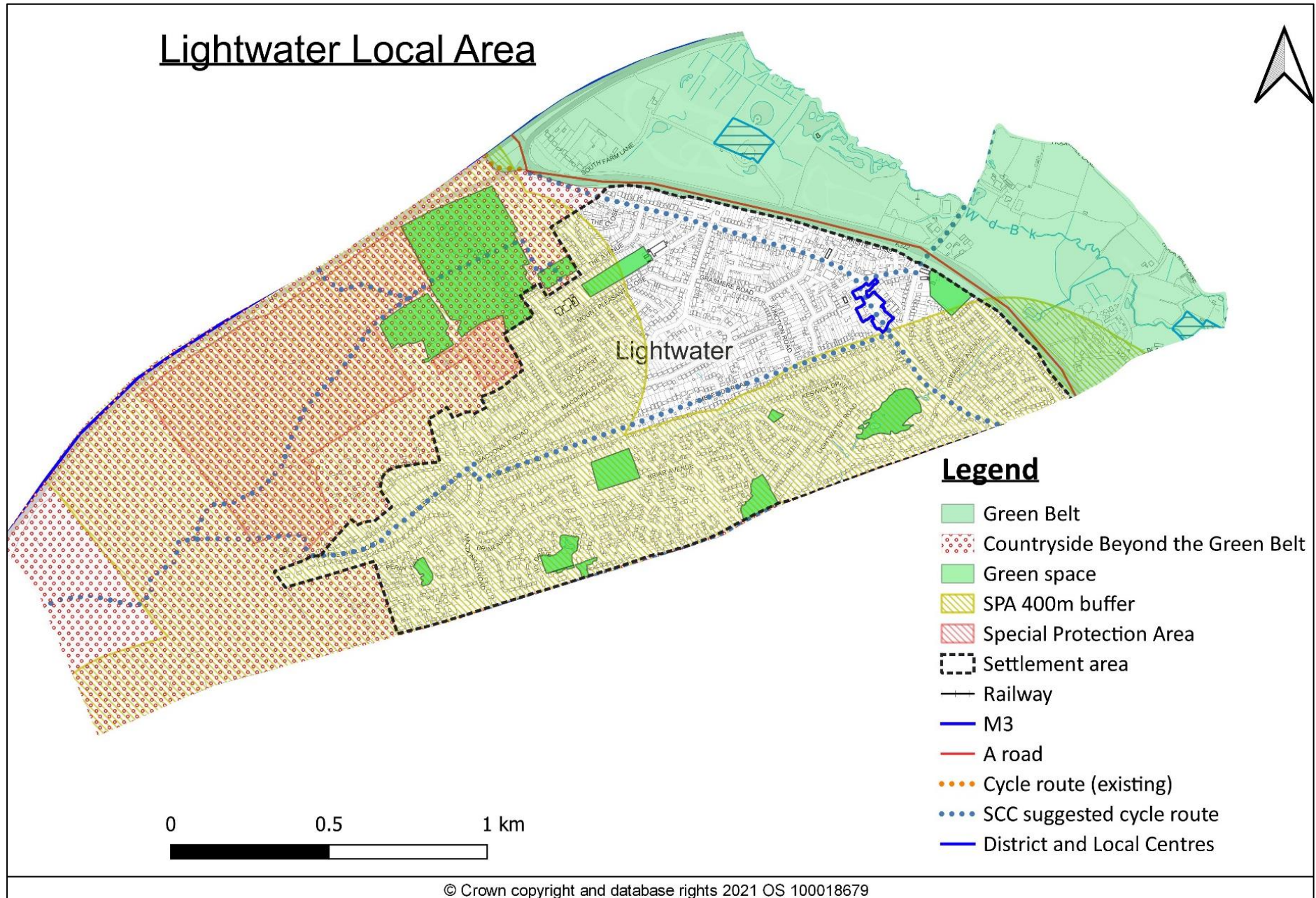
Lightwater

- 9.96. Lightwater is located at the centre of the Borough, 5 miles east of Camberley, south of the M3, and has a population of just under 7,000 people. There is evidence of a Roman settlement in the 1st Century AD just to the east of Lightwater adjacent to the Bourne stream. By the 19th century only a handful of houses and farms were present. The area was a vast tract of Lowland Heath known as Bagshot Heath with farmland around its edges. The name 'Lightwater' originates from the clear (light) water that flowed from the common moorland.
- 9.97. The centre of the Village developed around Guildford, All Saints, Ambleside, Macdonald and Broadway Roads and largely derives its valued character from Victorian and Edwardian buildings from the period 1890-1915. Development centred fronting MacDonald Road and Ambleside Road originates from the WWI to WW2 period and are predominantly detached. The majority of residential development in Lightwater has been built since 1964, consisting of a number of housing estates developed from the 1960s to mid-1980s.
- 9.98. A Village Design Statement Supplementary Planning Document has been adopted for Lightwater. The Lightwater Village Design Guide 2007 aims to protect and enhance the local distinctiveness of Lightwater, in respect of its built environment and landscape, through guiding new development and other changes to the environment.
- 9.99. The Windlebrook forms part of the eastern boundary and the Environment Agency Flood Zones 2 and 3 affect some of the countryside surrounding Lightwater. Lightwater's settlement area is surrounded by countryside and the Thames Basin Heaths SPA to the south and west and the Green Belt lies to the north and east. The majority of Lightwater is within the Thames Basin Heaths SPA 400m buffer zone and therefore opportunities for new development are very limited. Development may therefore only come forward on brownfield and windfall sites, outside the 400m buffer zone, over the plan period.



- 9.100. Lightwater is home to Lightwater Country Park which extends to 59ha. The Country Park is predominately heathland habitat, but also includes ponds, woodland, meadows and areas of scrub. These habitats offer the opportunity to observe a wide variety of wildlife, birds, mammals, plants and insects. An area of heathland within the Country Park has been designated a Site of Special Scientific Interest (SSSI) and is also part of the Thames Basin Heaths Special Protection Area. The Country Park is therefore an area of high nature conservation value.
- 9.101. Lightwater has direct access to the M3 via junction 3 to the north of Lightwater. The A322 runs parallel to the eastern boundary of Lightwater's settlement area and constitutes a major route between Surrey and Berkshire. Red Road (B311) runs parallel to the southern border of Lightwater's, which is a significant link between the east and west of the Borough.
- 9.102. Bus services to Lightwater are limited, but the area is served by the Camberley to Guildford Bus service. There are no formal cycle routes in Lightwater. Opportunities to improve and extend the cycle network in Lightwater will be explored with Surrey County Council, the responsible authority for transport and public rights of way in Surrey Heath. The closest railway station to Lightwater is Bagshot, located about 1km north of Lightwater's Local Centre.
- 9.103. Lightwater contains a designated Local Centre that represents one of the greatest concentrations of retail and other E-use classes in the east of the Borough, offering a range of shops and services centred on Guildford Road north of the junction with Ambleside Road.
- 9.104. Several statutory listed buildings in the Lightwater local area are located on the A322, including the Rectory Farmhouse. In addition, an area is identified as an Area of High Archaeological Potential, to the north of Lightwater. The area has protected greenspaces including amenity open spaces, Lightwater Leisure Centre and school playing fields. There are several individual and area TPOs throughout Lightwater, including in areas north and south of Briar Avenue. Part of Lightwater Park is designated a SINC and there a number of other SINC's in the local area.
- 9.105. The Lightwater Leisure Centre is situated within the Country Park and is a modern sporting and leisure complex catering for many indoor sporting and social activities; outdoors there are tennis courts, and pitches for rugby, football and hockey. Within the Park, there are informal seating areas around Hammond Ponds, a Heathland Visitor Centre, a picnic area, and easy access paths have been created.





Local Area Principles for Lightwater

Design and Heritage

- 1) Ensure development complements the generally Victorian and Edwardian character of Lightwater, by providing good quality development in accordance with design policy DHI Design Principles.
- 2) Preserve and enhance Lightwater's designated heritage assets, and their setting, including the Statutory Listed Grade II buildings at the Rectory Farm, Lee Lane Farmhouse and Pleasant Cottage, in accordance with heritage Policy DH7.

Housing

- 3) Ensure To promote the optimum use of land in sustainable locations apply the minimum density standards set out in Policy DH2 for non-allocated major sites. This policy sets a minimum density standard of 30 dph in Lightwater settlement area.

Employment and Retail

- 4) Retain the designation of Lightwater Local Centre, with revised boundaries that take account of the most up-to-date evidence in the Surrey Heath Retail Site Survey 2019, as defined on the Local Plan Policies Map and set out in Policy ER8.
- 5) Align the Primary Shopping Area of Lightwater with the boundary of the Local Centre as defined on the Local Plan Policies Map and set out in Policy ER8.

Transport

- 6) Seek to improve cyclist access in the local area and to Bagshot Station, in accordance with Transportation Policy IN2 and Climate Change Policy SS3a.
- 7) Promote provision of pedestrian and cyclist access as part of any new major developments in accordance with Policy IN2.
- 8) Support the provision of public transport and highways improvements within the area in accordance with Policy IN2.

Green Infrastructure and Greenspaces

- 9) Provide protection to greenspaces in the Lightwater local area as shown on the Local Plan Policies Map, and in accordance with the requirements of Policy IN6.

Community Infrastructure

- 10) Community facilities in Lightwater will be protected in accordance with Policy IN4.



West End

- 9.106. The West End local area contains the village of West End itself and rural areas that are designated Green Belt or Countryside beyond the Green Belt. The settlement area of West End is inset within the Green Belt and Countryside beyond the Green Belt. Much of the rural area to the west of the settlement is heathland designated as Thames Basin Heaths Special Protection Area. In addition, a significant part of the settlement area of West End is also within the 400m exclusion zone of the Special Protection Area, where further residential development is very limited. The West End local area has a population of around 4,590¹⁷⁶.
- 9.107. West End's name originated as the settlement was initially considered to be the western part of nearby Chobham. Prior to the settlement's existence, the area consisted of open heathland and peat bogs. The local area of West End includes a number of Grade II Listed Buildings and a Grade II* Listed Building at Brook Place, located northeast of West End Village, which dates back to 1656. The Grade II listed Hookstone Farm, located north of West End Village is one of the oldest houses in the West End local area, with some parts pre-dating 1450.
- 9.108. In addition to the policies in the Local Plan, planning decisions in West End are also guided by the West End Village Design Statement Supplementary Planning Document which was adopted in 2016.
- 9.109. West End has a Neighbourhood Parade, which is centrally located at The Parade, Gosden Road. This provides a small range of shops for the local community. Many of West End Village's amenities are located in proximity of the A322 Guildford Road which is the main road through the village, running north to south towards Bracknell and Guildford respectively. West End also has a small High Street which has local amenities including a post office, convenience shop and social club. To the north of the High Street large green open spaces flanked by mature trees contribute to the verdant and open character of the village.
- 9.110. Limited public transport serves West End including some bus services providing connectivity with larger nearby towns such as Camberley, Woking and Guildford. The nearest train station is located 5km to the south of West End at Brookwood, and is also accessible from the village via the bus network.

¹⁷⁶ ONS ward level population estimates mid-2017:

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/wardlevelmidyearpopulationestimatesexperimental>

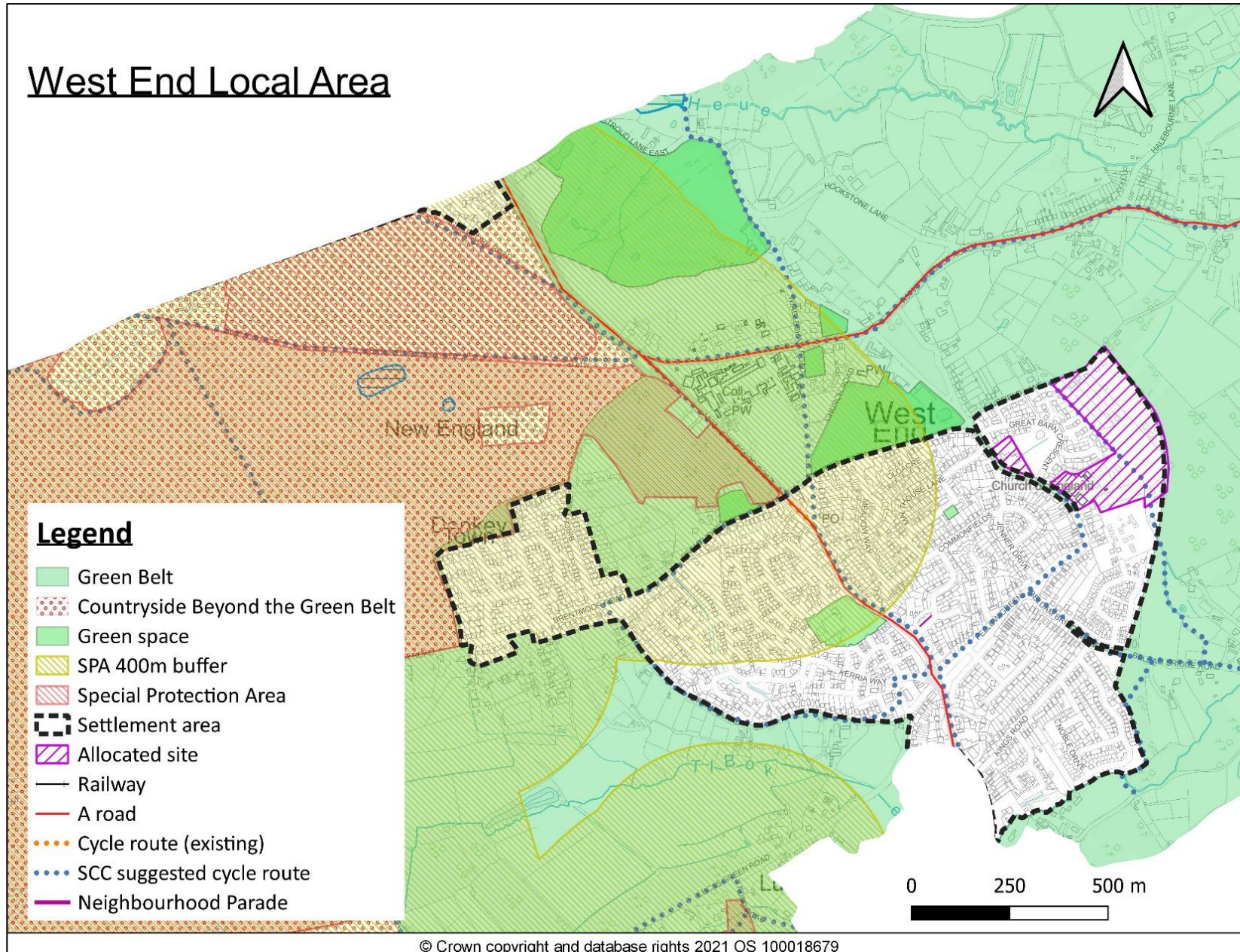


- 9.111. There is currently only one designated cycle route in West End, which runs for a short distance adjacent to Guildford Road. This does not provide connectivity to other parts of the settlement, or to neighbouring areas, and therefore the local area is disconnected from the wider cycle network. Opportunities to introduce cycle and pedestrian routes in West End that also provide connectivity to nearby settlements and Brookwood Train Station will be explored with Surrey County Council, the responsible authority for transport and public rights of way in Surrey.
- 9.112. West End includes a number of proposed protected greenspace designations and these are generally located within and adjacent to the settlement area. The designated greenspaces include recreation grounds, allotments and informal greenspaces. In addition, there are significant areas of Common Land within the vicinity of West End Village. One of the most notable areas of Common Land is at West End Parish Recreation Ground to the north of the settlement which provides a wide range of formal recreation amenities and informal recreation opportunities. The Common Land borders the edge of the settlement, and contributes positively to the character of West End. Future management of this land should seek to include replacement planting for the trees that flank the open space and contribute to the unique character of the area should any required felling take place, in accordance with Policy DH5.
- 9.113. The West End local area also contains a number of Sites of Importance for Nature Conservation (SINCs) including West End Churchyard SINC and The Folly SINC. There are a number of individual and woodland Tree Preservation Orders (TPOs) in the local area, particularly within the settlement area of West End, which help contribute to the green character of the village.
- 9.114. In the north of the West End local area, there is flood risk present from The Hale Bourne watercourse, and in the south of the local area, there is flood risk arising from The Bourne watercourse. Affected areas are covered by the Environment Agency's Flood Zone 2 and 3 designations.
- 9.115. The village of West End has seen significant growth in recent years at its eastern fringe, where previously allocated housing reserve sites have been granted planning permission. The sites are currently designated Countryside beyond the Green Belt but it is proposed to extend the settlement boundary to include the now largely developed sites within West End.



- 9.116. There are no further opportunities for development in the Countryside Beyond the Green Belt in West End, as this land is either designated Special Protection Area, or within the 400m exclusion zone around the Special Protection Area. Overall, it is considered that limited development in the West End local area will therefore largely come forward on small previously developed sites including windfall sites located outside of the above designated areas. It is also possible that housing could be delivered at rural exception sites within the Green Belt, subject to there being a demonstrable local need for this type of development, and proposals meeting the criteria in Policy H6.
- 9.117. The settlement area of West End is separated from the settlement of Bisley by a small stretch of Green Belt land. It is important that the gap between the two settlements is maintained, to prevent any coalescence of the villages.





Local Area Principles for West End

Design and Heritage

- 1) Ensure development complements the character of West End Village and the wider local area by providing good quality development in accordance with design policy DH1 Design Principles, and the West End Village Design Statement.
- 2) Conserve the open green setting of West End Village that is particularly recognisable at the northern edge of the settlement area by ensuring continued preservation of West End Parish Recreation Ground.
- 3) Preserve and enhance West End's designated heritage assets, and their setting in accordance with heritage Policy DH7, including the various Grade II listed buildings and the Grade II* listed building within the local area.
- 4) Protect West End's non-designated heritage assets where this is practically achievable, in accordance with Policy DH7.

Housing

- 5) Any development within the Green Belt should not impact its openness or rural character, in accordance with Policies GBC1 and GBC2, as required.
- 6) Amend the settlement boundary of West End to include the previously allocated West End housing reserve sites east of Benner Lane and south of Kings Road within the settlement area, as defined on the Local Plan Policies Map.
- 7) To promote the optimum use of land in sustainable locations apply the minimum density standards set out in Policy DH2 for non-allocated major sites. This policy sets minimum density standard of 30 dph in the West End settlement area.
- 8) Recognise that there may be potential opportunities for rural exception sites subject to development meeting identified needs and other criteria set out in Policy H9.

Employment and Retail

- 9) Retain the designation of identified Neighbourhood Parade in Gosden Road, as defined on the Local Plan Policies Map.

Transport

- 10) Seek to introduce a cycle network within the West End local area, promoting better connectivity between West End Village, neighbouring settlements, and Brookwood Station.
- 11) Promote provision of pedestrian and cyclist access as part of any new major developments in accordance with Policy IN2.



- 12) Support the provision of public transport and highways improvements within the area in accordance with Policy IN2.

Green Infrastructure and Greenspaces

- 13) Provide protection to greenspaces in the West End local area as shown on the Local Plan Policies Map, and in accordance with the requirements of Policy IN6.

Community Infrastructure

- 14) Community facilities in West End will be protected in accordance with Policy IN4.



Windlesham

- 9.118. Windlesham is defined as having two separate settlement areas. The area based around Snows Ride is the more northerly of the two and is largely residential. The older settlement area is the more southerly Windlesham Village which contains the village's centre at Updown Hill which provides retail uses and local services. Both settlement areas are inset from the Green Belt with the remaining local area of Windlesham being part of the Green Belt. The population of the local area of Windlesham is around 4,400¹⁷⁷.
- 9.119. The local area of Windlesham Village contains 17 listed buildings, 16 of which are Grade II listed and Benjamin's Mount and attached steps which is Grade II* listed. There are 26 locally listed buildings within the local area of Windlesham Village. Furthermore Windlesham Village has two designated Conservation Areas, one centred around Updown Hill and the other concentrated around Church Road. The northern edge of the settlement area at Snows Ride adjoins the A30, a historic coaching route linking London to Land's End.
- 9.120. Windlesham Village contains a proposed Strategic Employment Sites at Eli Lilly, which is the European Centre for Neuroscience research and development. The site has good links to the strategic motorway network as well as adjacent bus stops on the A30.
- 9.121. The southern settlement area of Windlesham contains the village's identified Local Centre which provides a range of shops and services concentrated around Updown Hill and Chertsey Road. The Local Centre has a strong presence of retail units in an E(a) use-class, according to the Retail Site Survey Paper 2021¹⁷⁸.
- 9.122. There is no rail service from Windlesham with the nearest rail station being at Bagshot, approximately 1.4 miles away which is located on the Ascot to Guildford Line. The railway station at Sunningdale is also within 2 miles of the settlement area of Windlesham Village and on a line that provides access to London Waterloo. One bus route serves Windlesham Village which provides access to neighbouring areas and larger settlements including Bagshot, Camberley and Staines. Windlesham is connected to some of the other eastern villages by pedestrian access via public rights of way and bridleways. Currently there are no cycle routes linking Windlesham Village to other areas. Opportunities to introduce cycle and pedestrian routes in Windlesham Village that also provide connectivity to nearby settlements will be explored with Surrey County Council, the responsible authority for transport and public rights of way in Surrey Heath.

¹⁷⁷ ONS ward level population estimates mid-2017:

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/wardlevelmidyearpopulationestimatesexperimental>.

¹⁷⁸ Retail uses in the Borough recorded in the Surrey Heath Retail Site Survey Paper 2019:

<https://www.surreyheath.gov.uk/residents/planning/planning-policy/evidence-base>.



- 9.123. A number of greenspaces are proposed for designation in the Windlesham local area. These include informal open spaces in residential localities within the two separate settlement areas of Windlesham and proposed allocations at Windlesham Field of Remembrance and Windlesham Cemetery, outside of the settlement areas. The Windlesham Field of Remembrance is a key asset of Windlesham that includes community and recreational facilities, and is wholly located within the Green Belt. The Windlesham local area also contains a number of Sites of Importance for Nature Conservation (SINCs) including Halebourne Copse and Fields SINC, Manor Farm Wood SINC and Burnt Pollard Lane SINC. There are a number of individual and area Tree Preservation Orders (TPO's) in Windlesham. These include area TPOs to the west of Snows Ride and south of Kennel Lane and also Woodhall Grange.
- 9.124. Some areas to the south and west of Windlesham are affected by flooding from the Windle Brook. These areas lie within Environment Agency Flood Zones 2 and 3.
- 9.125. The local area of Windlesham is predominately within the Green Belt and its rural setting has resulted in limited opportunities for public transport options. The potential for residential development within this area is limited as a consequence of this.
- 9.126. Housing in Windlesham will be primarily delivered through the redevelopment of existing brownfield sites within the settlement areas. The previously allocated housing reserve site at Heathpark Wood has now been granted planning permission. The site currently lies in Countryside beyond the Green Belt and it is proposed to extend the boundary of the southerly settlement area of Windlesham Village to incorporate the site. It is also possible that housing could be delivered at rural exception sites within the Green Belt, subject to there being a demonstrable local need for this type of development, and proposals meeting the criteria in Policy H9.
- 9.127. The Windlesham Neighbourhood Plan 2018-2028 was 'made' at Full Council on 12 June 2019 and now forms part of the Borough's Development Plan. The designated Neighbourhood Area for the Windlesham Neighbourhood Plan covers both settlement areas of Windlesham and surrounding Green Belt land, but does not include other areas of the Parish such as Lightwater and Bagshot. The Plan sets out policies for the neighbourhood area of Windlesham¹⁷⁹.

¹⁷⁹ In order for the policies in the Windlesham Neighbourhood Plan to be considered up-to-date, they must be compliant with the Local Plan.

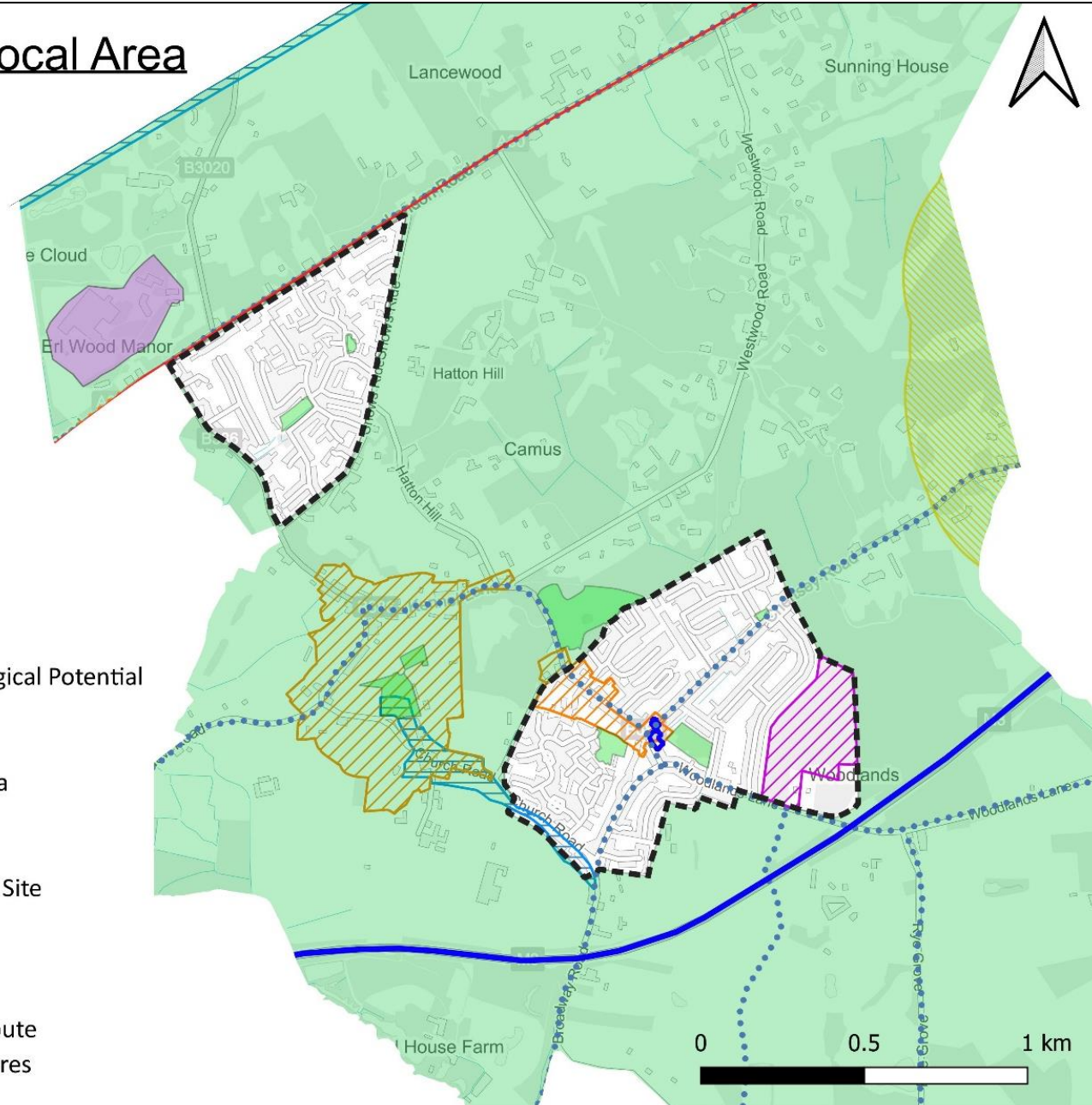


Windlesham Local Area



Legend

- Green Belt
- Conservation Area
- Area of High Archaeological Potential
- Green space
- SPA 400m buffer
- Special Protection Area
- Settlement area
- Allocated site
- Strategic Employment Site
- M3
- A road
- Cycle route (existing)
- SCC suggested cycle route
- District and Local Centres



Local Area Principles for Windlesham

Design and Heritage

- 1) Ensure residential development complements the character of Windlesham by providing good quality development in accordance with design policy DHI Design Principles and policies within the Windlesham Neighbourhood Plan.
- 2) Preserve and enhance Windlesham's designated heritage assets and their setting, particularly the Grade II* listed Benjamin's Mount and attached steps, Westwood Road in part in accordance with heritage Policy DH7.
- 3) Protect Windlesham's non-designated heritage assets where this is practically achievable, in accordance with Policy DH7.
- 4) Within Windlesham, Updown Hill Conservation Area and Windlesham, Church Road Conservation Area the design of shops fronts and signage should respect the character of the designated areas.

Housing

- 5) Amend the settlement boundary of Windlesham to incorporate the previously allocated reserve site at Heathpark Wood within the settlement area, as defined on the Local Plan Policies Map.
- 6) To promote the optimum use of land in sustainable locations apply the minimum density standards set out in Policy DH2 for non-allocated major sites. This policy sets a minimum density standard of 30 dph in the Windlesham settlement area.
- 7) Recognise that there may be potential opportunities for rural exception sites subject to them meeting identified needs and other criteria set out in Policy H9.

Employment and Retail

- 8) Protect employment land in Windlesham by allocating a Strategic Employment Site at Eli Lilly, as defined on the Local Plan Policies Map and set out in Policy ER2.
- 9) Retain the designation of Windlesham as a Local Centre, with revised boundaries that take account of the most up-to-date evidence in the Surrey Heath Retail Site Survey 2019, as defined on the Local Plan Policies Map and set out in Policy ER9.

Transport

- 10) Seek the creation of cycle links within the settlement area of Windlesham and improve cycle access to outlying areas and neighbouring settlements.
- 11) Promote provision of pedestrian and cyclist access as part of any new major developments in accordance with Policy IN2.
- 12) Support the provision of public transport and highways improvements within the area in accordance with Policy IN2.



Green Infrastructure and Greenspaces

- 13) Protect greenspaces in the Windlesham local area as shown on the Local Plan Policies Map, and in accordance with the requirements of Policy IN6.

Community Infrastructure

- 14) Community facilities in Windlesham will be protected in accordance with Policy IN4.



10. Surrey Heath Local Plan Monitoring and Implementation

Implementation

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

Monitoring

- 10.4. It is essential that the policies in this Local Plan are monitored so that early action can be taken to overcome any barriers to the delivery of the Plan's Vision and Objectives.
- 10.5. Monitoring is also important to enable communities and interested parties to be aware of progress and ensure that the overall development plan strategy is being delivered. The Council is required under the Localism Act to produce an annual Authority Monitoring Report (AMR) which must include information on how a Local Authority is implementing their Local Development Scheme and how Local Plan policies are being delivered. Amongst other things, the AMR will show the number of homes and amount of employment and retail space that have been delivered on an annual basis.
- 10.6. Annual housing monitoring will also inform the production of an annual five year housing land supply paper and response to the Housing Delivery Test.
- 10.7. A Monitoring Framework is set out in Table 9 below.
- 10.8. It should be noted that targets only apply where proposals require planning permission and therefore where the policies in the Local Plan are used. Some types of developments, for example certain changes of use do not require planning permission and are therefore outside of the control of the planning process. In addition, the Local Plan policies will only have weight in decision making once the Plan has progressed further in the preparation process so is unlikely to have significant weight in decisions on planning applications until 2023.



Review

- 10.9. Whilst the Council has a requirement to review the Local Plan every five years, annual monitoring will help to identify whether there is a need to review policies in advance of this period. Other factors might also require the Council to review the Local Plan including, significant changes to national planning policy, guidance or legislation, or if there are significant strategic cross boundary planning matters to be addressed across a wider geographic area.



Table 9 – Monitoring Framework

Local Plan Section	Indicator	Annual Target / Plan period target (2038)	Delivery Partners	Data Source
Objective A				
Objective	To deliver sustainable development that contributes to meeting housing needs, providing new homes of an appropriate housing mix and tenure, including specialist housing needs.			
Key Delivery policies	SS1 Spatial Strategy HA1 Housing Allocations HA2 London Road Block HA3 Land East of Knoll Road HA4 Mindenhurst H5 Range and Mix of Housing H6 Specialist Housing H7 Affordable Housing H8 Loss of Housing H9 Rural Exception Sites H10 First Homes H11 Gypsies, Travellers and Travelling Showpeople			
A1	Net additional dwellings in line with: a) Dwelling completions per annum	Annual target – average of at least 286 dpa up until 2032 and 327 dpa until 2038 and in line with current trajectory Plan target – delivery of at least 5,680 dwellings	Landowners, developers, Registered Providers, Other agencies such as the EM3LEP/ Natural England	Planning completions/appeals monitoring/Self Build Register
A2	Five year supply	Annual target – provision of 5 year housing land supply		
A3	Affordable housing completions	Annual and Plan target – 100% of qualifying schemes deliver 40% affordable housing unless provisions of H7 are met		

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Local Plan Section	Indicator	Annual Target / Plan period target (2038)	Delivery Partners	Data Source
A4	Net additional Gypsy and Traveller Pitches and Travelling Showpeople plots.	Annual target – in line with trajectory (to be prepared for Reg19 Local Plan) Plan target – GTAA target 32 pitches and 14 plots		
A5	Specialist housing delivered	Annual and Plan target – in line with 2020 HNA		
A6	Percentage of affordable and market units completed by type and size	Annual and Plan target – in line with Policies H5 and H7 and the 2020 HNA or any update		
A7	Number of self-build plots	Annual and Plan target – delivery of three-year rolling Self Build Register need.		
A8	Availability of SANG	Annual target – capacity to deliver 5 year housing supply. Plan target – sufficient to meet number of new homes set out in Policy SSI.		



Local Plan Section	Indicator	Annual Target / Plan period target (2038)	Delivery Partners	Data Source
Objective B				
Objective B	To protect Strategic and Locally important employment sites to ensure an appropriate supply of employment land to help fulfil the Borough's role in facilitating strong economic performance within the Functional Economic Area (Hart, Rushmoor and Surrey Heath) and wider EM3 LEP area.			
Key Delivery Policies	SS1 Spatial Strategy ER3 Locally Important Employment Sites	ER1 Economic Growth and Investment ER4 Yorktown Business Park	ER2 Strategic Employment Sites	
B1	Total amount of additional B2/B8 and E Class floorspace by type in identified Strategic and Locally Important Employment Sites	Annual and Plan target: No net loss	Landowners/ developers/ businesses	Planning applications/appeals monitoring Published data e.g. ONS Business Register Employment Survey (BRES) and Nomis
B2	Number of employee jobs in the Borough	Annual and Plan target: Increase on 2019 base ¹⁸⁰		
B3	Provision of accommodation for small/micro businesses	Annual and Plan target: Increase in small businesses over 2019 base ¹⁸¹		

¹⁸⁰ Source: ONS - https://www.nomisweb.co.uk/reports/lmp/la/1946157335/subreports/bres_time_series/report.aspx 55,000 jobs in 2019.

¹⁸¹ Source: ONS - <https://www.nomisweb.co.uk/reports/lmp/la/1946157335/report.aspx?#idbr> 4,585 micro and small businesses in 2019.



Local Plan Section	Indicator	Annual Target / Plan period target (2038)	Delivery Partners	Data Source
Objective C				
Objective	To enhance the vitality and viability of Camberley Town Centre and the other District and Local centres within the Borough.			
Key Delivery Policies	CTC 1 Camberley Town Centre, CTC 2 Camberley Town Centre Primary Shopping Area ER8 District Centres and Local Centres ER9 Neighbourhood Parades ER10 Old Dean			
C1	Total amount (gross) of floorspace for town centre uses in defined town, district and local centres.	Annual and plan target – no net loss	Surrey Heath Borough Council (as landowner)/ Developers/ landowners	Planning application/appeal monitoring/annual centre surveys
C2	Percentage of units in E(a) (retail) use in defined Primary Shopping Areas in town, district and local centres.	Plan and Annual target – no net loss in percentage against 2019 baseline.		
C3	% vacant units in defined town, district and local centres.	Annual – no increase in % of vacant units (over rolling 3 year period) 2038 – no increase in vacant premises over 2019		



Local Plan Section	Indicator	Annual Target / Plan period target (2038)	Delivery Partners	Data Source
Objective D				
Objective	To ensure that development within the Borough is supported by the necessary physical, social and green infrastructure to meet the needs of Surrey Heath residents.			
Key Delivery Policies	IN1 Infrastructure Delivery IN2 Transportation IN4 Community Facilities IN5 Green Infrastructure IN3 Digital Infrastructure and Telecommunications			
D1	Delivery of appropriate infrastructure to support development	Annual and Plan target – infrastructure delivered in line with policies and planning permissions on allocated sites and in line with the IDP	HCC / Infrastructure providers / Landowners / developers	Applications and appeals monitoring / liaison with infrastructure providers.
D2	Loss of open space and community facilities	Annual and Plan target – no net loss unless consistent with Local Plan policies.		



Local Plan Section	Indicator	Annual Target / Plan period target (2038)	Delivery Partners	Data Source
Objective E				
Objective	To ensure that development does not have a detrimental impact on the Boroughs environmental assets including designated international and national sites, landscape character, water quality and biodiversity and that new development provides for biodiversity and environmental net gains.			
Key Delivery Policies	E1 Thames Basin Heaths Special Protection Area, E2 Biodiversity and Geodiversity, E3 Biodiversity Net Gain, DH5 Trees			
E1	Change in area of biodiversity importance as set out in Policy E2	Annual and Plan target - Maintain 100% land area of all designated sites	Surrey Nature Partnership / Developers / Landowners / Natural England	Planning applications / Annual surveys
E2	Percentage of applications delivering Biodiversity Net gain	Annual and Plan target: 100% major applications.		
E3	Quality and area of SPA/SSSIs	Annual and Plan target – improvements bringing all SSSIs into favourable condition.		
E4	Condition status of SNCIs	Annual and Plan target – no net loss and an increase in the proportion considered to be in positive management.		



Local Plan Section	Indicator	Annual Target / Plan period target (2038)	Delivery Partners	Data Source
Objective F				
Objective	To ensure that new development minimises or mitigates the impact of development on air quality, noise, light pollution, odours, emissions and particulates.			
Key Delivery Policies	E4 Pollution and Contamination			
FI	Air quality and nitrogen deposition on European Sites	Annual and Plan target - Change in NO _x deposition Within the critical load for the relevant habitat.	SCC/Natural England/affected neighbouring local authorities	The Council will work with partners to consider the best way to monitor changes in air quality and nitrogen deposition on European Sites.



Local Plan Section	Indicator	Annual Target / Plan period target (2038)	Delivery Partners	Data Source
Objective G				
Objective	To ensure that new development, unless appropriate development under the Exceptions Test, is not located in areas of high or medium risk of flooding and that development does not increase surface water run-off.			
Key Delivery Policies	E6 Flood Risk and Sustainable Drainage			
G1	Number of planning permissions granted contrary to Environment Agency advice on flooding and water grounds	Annual and Plan target – 0% applications	Developers / Landowners / Environment Agency	Planning applications / appeals monitoring
G2	Number of developments completed with SUDs measures implemented.	Annual and Plan target – 100% of qualifying developments		



Local Plan Section	Indicator	Annual Target / Plan period target (2038)	Delivery Partners	Data Source
Objective H				
Objective	To support action on climate change and reduction of the Borough's carbon emissions, aiding the transition to net zero through a combination of mitigation and adaptation measures, including the appropriate delivery of opportunities for renewable energy, energy efficiency and improving resilience to the impacts of climate change.			
Key Delivery Policies	SS3a and SS3b Climate Change Mitigation and Adaptation DH4 Sustainable Water Use	E5 Renewable and Low Carbon Energy Schemes DH8 Building Emission Standards		
H1	Low and zero carbon decentralised energy networks	Plan period - Increase in number	Landowners / developers	Planning applications / appeals monitoring / National statistics / Building Regulation final certificates
H2	Average energy consumption/carbon emissions per person	Annual and Plan target - Reduction to meet UK average		
H3	Proportion of new homes built meeting the requirement of 110 litres/person/day	Annual and Plan target – 100%		
	Amount of waste sent for energy recovery/recycling	Annual and Plan target – increase on 2019 baseline ¹⁸²		

¹⁸² 62% in 2019/20 Defra Household waste recycling rate (England average 43.8%)



Local Plan Section	Indicator	Annual Target / Plan period target (2038)	Delivery Partners	Data Source
Objective I				
Objective	To protect the character and purpose of the Green Belt and the character of the Countryside beyond the Green Belt.			
Key Delivery Policies	GBC1 Development of new buildings in the Countryside GBC3 Equestrian Facilities Gordons School, West End	GBC2 Development of Existing Buildings in the Green Belt GBC4 Development within the Countryside		GBC5
11	Number of planning decisions, including appeals, granting permission for inappropriate development in the Green Belt.	Annual and Plan targets – 0%	Developers/ landowners	Planning application/appeal monitoring
12	Number of planning decisions, including appeals, granting permission for development in the countryside that is not in accordance with policy.	Annual and Plan target - 0%		

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Local Plan Section	Indicator	Annual Target / Plan period target (2038)	Delivery Partners	Data Source
Objective J				
Objective	To conserve and enhance the Borough’s built environment and heritage assets, both designated and non-designated.			
Key Delivery Policies	DHI Design Principles	DH6 Shopfronts, Signage and Advertisements	DH7 Heritage Assets	
J1	Number and quality of designated heritage assets.	Annual and Plan target - No loss of designated assets No assets at risk	Developers / Landowners / Historic England	Historic England records



Local Plan Section	Indicator	Annual Target / Plan period target (2038)	Delivery Partners	Data Source
Objective K				
Objective	To promote healthy, sustainable and cohesive local communities through good design and access to homes, employment, community and recreational facilities.			
Key Delivery Policies	DH1 Design principles DH3 Residential Space Standards IN4 Community Facilities IN7 Indoor and Built Sports and Recreational Facilities		DH2 Making Effective Use of Land Local Area Profiles	
K1	Amount of greenspace or recreational facilities lost to other uses.	Annual/2038 – No net loss unless consistent with Local Plan policies.	Developers / Landowners	Planning application / appeals monitoring
K2	Percentage of dwellings on previously developed land	Annual and Plan target – monitoring of development coming forward from the brownfield land register and non-allocated sites on greenfield sites.		
K3	Making effective use of land	Annual and Plan target – density of schemes permitted in line with Policy DH2 and Housing Allocations.		

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Local Plan Section	Indicator	Annual Target / Plan period target (2038)	Delivery Partners	Data Source
K4	Delivering good space standards	Annual and Plan targets - 100% new homes meet the Nationally Described Space Standards		
Objective L				
Objective	To support measures that prioritise active and sustainable travel modes including improved facilities for pedestrians and cyclists and improvements to public transport.			
Key Delivery Policies	CTC3 Camberley Town Centre – Movement and Accessibility IN1 Infrastructure Delivery IN2 Transportation			
L1	Percentage of all qualifying developments supported by a Travel Plan.	Annual and Plan target –100% of all major developments	Landowners/ developers/ Surrey County Council	Planning application / appeal monitoring / Assessment through AMR process / Infrastructure Funding Statement
L2	Provision of additional cycle infrastructure	Annual target – increase on 2019		



Local Plan Section	Indicator	Annual Target / Plan period target (2038)	Delivery Partners	Data Source
L3	Use of sustainable travel modes	Plan target – Increase in travel to work Modal share by sustainable travel modes in 2031 Census over 2011 Census baseline ¹⁸³		Census 2011, 2021 and 2031
L4	Transport Infrastructure associated with new development	Plan and Annual target – delivery in line with planning permissions for allocated sites and Infrastructure Delivery Plan.		Planning application/appeal monitoring/Assessment through AMR process/Infrastructure Funding Statement

¹⁸³ Available online at: <https://www.surreyi.gov.uk/2011-census/method-of-travel-to-work/>.



11. Appendix I: Glossary

Table 10: Glossary

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



Abbreviation	Term	Explanation
	Affordable Housing	The NPPF (2021) definition of affordable housing can be found at Annex 2 of the Glossary.
	Appropriate Assessment (Also known as Habitats Regulations Assessment)	If a proposed plan or project is considered likely to have a significant effect on a protected habitats site ¹⁸⁴ (either individually or in combination with other plans or projects) then an appropriate assessment of the implications for the site, in view of the site's conservation objectives, must be undertaken (Part 6 of the Conservation of Habitats and Species Regulations 2017 (or as amended ¹⁸⁵). This does not apply to plans or projects directly connected to the conservation management of the features for which the site was designated.
	Article 4 direction	A direction which withdraws automatic planning permission granted by the General Permitted Development Order. An Article 4 Direction can either remove all or specific General Permitted Development rights
AMR	Authority Monitoring Report	An annual report produced by the Council in accordance with the Localism Act 2011 which includes an update of how Local Plan policies are being delivered.
	Biodiversity	The existence of a wide variety of plant and/or animal species.
BOA	Biodiversity Opportunity Area	Areas where there are recognised concentrations of sites of biodiversity importance, both statutory and non-statutory.

¹⁸⁴ See: <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>.

¹⁸⁵ Available online at: <http://www.legislation.gov.uk/ukxi/2017/1012/part/6/made>.



Abbreviation	Term	Explanation
	Biodiversity Net Gain	Approach to development that seeks to leave the environment in a measurably better state than beforehand.
	Building Regulations	Ensures that the policies set out in legislation regarding building standards are carried out. Building Regulations approval is required for most building work in the UK.
BREEAM	Building Research Establishment Environmental Assessment Method	A method for assessing, rating and certifying the sustainability of buildings.
	Brownfield Land Register	Regulation 3 of The Town and Country Planning Act (Brownfield Land Register) Regulations 2017 requires local authorities to prepare, maintain and publish a register of brownfield land. The register identifies previously developed sites in the Borough that have been assessed as being suitable for housing.
	Climate Change Adaptation	Adjustments made to natural or human systems in response to the actual or anticipated impacts of climate change, to mitigate harm or exploit beneficial opportunities.
	Climate Change Mitigation	Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions. Mitigation can mean using new technologies and renewable energies, making older equipment more energy efficient, or changing management practices or consumer behaviour.



Abbreviation	Term	Explanation
	Community Facilities	Includes, but is not limited to, facilities such as community centres and other community meeting places, healthcare facilities, education facilities, childcare facilities, public houses, the voluntary sector, public service providers, places of worship and cultural facilities including theatres and arts centres.
CIL	Community Infrastructure Levy	A levy that local authorities can choose to charge on new developments in their area to fund infrastructure.
	Conservation Area	Areas of special architectural or historic interest which are designated to offer greater protection to the built and natural environment.
	Core Strategy Development Plan Document	It is a strategic planning document containing the Council's long-term vision for the Borough, and policies to guide and manage development in Surrey Heath until 2028.
	Cultural Facilities	Includes theatres, museums, galleries and cinemas.
DPD	Development Plan Document	The Town and Country Planning (Local Planning) (England) Regulations 2012 refers to these as the Local Plan. It is the main planning policy document produced by the Council and forms the statutory development plan for the area.
	Density	Housing density is represented by the number of dwellings per hectare (dph). Net dwelling density is calculated by including only those site areas which will be developed for housing and directly associated uses, including access roads within the site, private garden space, car parking areas, incidental open space and landscaping, and children's play areas, where these are provided.



Abbreviation	Term	Explanation
	District Centre	A District Centre is a large group of retail shops, together with appropriate supporting non-retail town centre uses.
	Duty to Co-operate	A legal duty on local planning authorities to engage constructively, actively and on an ongoing basis with prescribed bodies to maximise the effectiveness of local plan preparation in the context of strategic cross-boundary matters
ELR	Employment Land Review	A technical study that identifies employment land to meet the needs of the Hart, Rushmoor and Surrey Heath Functional Economic Area (FEA) over the local plan period.
LEP	Enterprise M3 Local Enterprise Partnership	LEPs are partnerships between local authorities and businesses within a specific geographic area which play a central role in determining local economic priorities and undertaking activities to drive economic growth and the creation of local jobs. The Enterprise M3 LEP covers North Hampshire and West Surrey, and includes Surrey Heath.
	Evidence Base	Information gathered by a local planning authority to support a local plan and other development plan documents.



Abbreviation	Term	Explanation
	Extra Care Housing	For people whose disabilities, frailty or health needs make ordinary housing unsuitable but who do not need or want to move to long-term care (residential or nursing homes). It is used to describe a range of developments that comprise self-contained homes which have been designed, built or adapted to facilitate the care and support needs that its owners/tenants may have now or in the future, with access to care and support 24 hours a day, either on site or by call. It is also known as 'assisted living'.
	Five Year Strategy	The Council's Five Year Strategy approved on the 27 th October 2021 sets out the approach to challenges in the Borough under the themes of Environment, Economy, Effective and Responsive Council and Health and Quality of Life. The Strategy forms the basis for the Council's Annual Plan.
	Flood Zones	Flood Zones refer to the probability of river flooding. They are shown on the Environment Agency's Flood Map and within the Council's Strategic Flood Risk Assessment (SFRA) which defines the Borough's flood maps. Flood Zone 1 is low probability; Flood Zone 2 is medium probability; Flood Zone 3a is high probability and Flood Zone 3b is functional flood plain where land has to be stored or flows at times of flooding.
FEA	Functional Economic Area	Considers the geographical extent of the local economy and its key markets.
	Geodiversity	The natural range of geological, geomorphological and soil features that make up a particular landscape.



Abbreviation	Term	Explanation
	Green Belt	A designation for land around certain Cities and large built-up areas, which aims to keep this land permanently open or largely undeveloped.
	Green Infrastructure	A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities
	Government's standardised methodology	A standardised approach set out by Government to determine the objectively assessed housing needs of an area.
	Gypsies and Travellers	Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.
GTAA	Gypsy and Traveller Accommodation Assessment	An assessment of need in respect of the Gypsy and Traveller and Travelling Showpeople communities.
HIA	Health Impact Assessment	A combination of procedures, methods and tools by which a policy, programme or project may be judged as to its potential effects on the health of a population, and the distribution of those effects within the population.



Abbreviation	Term	Explanation
	Heritage Asset	Parts of the historic environment that have significance because of their historic, archaeological, architectural or artistic interest. They include designated heritage assets (such as listed buildings and conservation areas) and assets identified by the local planning authority during the process of decision-making or through the plan-making process.
HMA	Housing Market Area	The general area within which people most often move home. These typically cover the administrative areas of multiple councils.
	Infrastructure	The set of services and facilities necessary for a development to function. Infrastructure includes transport, education, leisure and health facilities, as well as open space and utilities, such as water and sewerage.
	Infrastructure Funding Statement	An annual statement setting out the infrastructure projects or types of infrastructure that have been, and are intended to be funded, either wholly or in part by the Community Infrastructure Levy or planning obligations.
	Infrastructure Needs Assessment	Sets out the baseline of infrastructure in the Borough and forms the first part of developing an infrastructure needs study.
	Intermediate Housing	Homes for sale and rent provided at a cost above social rent but below market levels. They can include shared equity (shared ownership and equity loans), other low-cost homes for sale and intermediate rent, but not affordable rented housing.



Abbreviation	Term	Explanation
	Listed Building	Buildings which are identified as having special architectural or historic importance and so are protected from demolition or inappropriate alteration or development by legislation and by planning policies. Protection also applies to certain other structures within the curtilage of Listed Buildings. The categories of listed buildings are: · Grade I - buildings of exceptional interest, Grade II*- buildings of more than special interest, Grade II – buildings of special interest.
	Local Centre	A local centre offers a smaller range of facilities than those present in a District Centre. They play an important role in meeting the day-to-day shopping needs for communities.
LDF	Local Development Framework	This is the name given to a portfolio of local planning documents that help guide and manage development. These include Development Plan Documents and Supplementary Planning Documents.
LDS	Local Development Scheme	The LDS sets out Surrey Heath Borough Council's programme for preparing future planning documents. It outlines what documents the Council will be working on and a timetable for the production of these documents.
	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.



Abbreviation	Term	Explanation
	Locally Important Employment Site	A site that is recognised for the important role it plays in servicing the local economy. Such sites are generally smaller employment sites that provide locations to support local businesses.
	Local Transport Plan	A statutory document prepared by Surrey County Council to set out key transport issues across the County and to establish a series of objectives to address them, including a programme for achieving them.
	Low-carbon energy	This is energy that makes more efficient use of fossil fuels. An example of this would be a gas-powered combined heat and power unit. As well as using the energy generated, it also harnesses the heat to achieve an overall reduction in energy usage.
	Market Housing	Private housing for rent or for sale, where the price is set in the open market.
NNR	National Nature Reserve	Key places for wildlife and natural features in England, designated by Natural England. They were established to protect the most significant areas of habitat and of geological formations.
NPPF	National Planning Policy Framework	The NPPF sets out the Government's planning policies for England and how these are expected to be applied at the local level. Local Planning Authorities must take the content into account in preparing Local Plans and in decision making.
NIA	Nature improvement area	Areas of land that have been identified for the opportunity they offer to restore nature at a landscape scale in conjunction with other land uses.



Abbreviation	Term	Explanation
	Neighbourhood Centre	A small-scale centre which can include a mix of small-scale retail and service uses to provide for the needs of the local community.
	Neighbourhood Forums	Neighbourhood Forums comprise of an Organisation or group empowered to lead the neighbourhood planning process where a neighbourhood area is unparished. The Organisation or group must apply to the local planning authority for its formal designation.
	Neighbourhood Planning	Neighbourhood planning gives local communities greater power to shape development by having a direct role in the development of planning policies at a local level. Neighbourhood planning can be undertaken by Parish Councils or Neighbourhood Forums
	Open Space	Land that is not built on and which has some amenity value or potential for amenity value. Amenity value is derived from the visual, recreational or other enjoyment which the open space can provide, such as historic and cultural interest and value as well as opportunities for sport and recreation.
	Permitted Development Rights	Permitted Development Rights are a national grant of planning permission, enabled by the Town and Country Planning (General Permitted Development) (England) Order 2015 which allow certain building works and changes of use to be carried out without having to make a planning application. They are subject to conditions and limitations.



Abbreviation	Term	Explanation
	Planning Obligation	Described in the NPPF 2021 Glossary annex 2 as: ' A legal agreement entered into under Section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal'.
	Planning Permission in Principle	A type of permission that a Local Planning Authority may grant for housing-led development either on application or through identifying land in qualifying documents, such as Local Plans, Neighbourhood Plans or Brownfield Registers.
PPG	Planning Practice Guidance	The PPG is a web based resource which contains guidance to supplement the NPPF. It was first published March 2014, and is regularly updated.
	Policies Map	A map of the Borough showing the Local Plan's proposals and where policies apply.
	Pollution	The introduction of contaminants into the environment that cause adverse change. Pollution can take the form of chemical substances or energy, such as noise, heat or light.
	Previously Developed Land	Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. The Glossary (Annex 2) of the NPPF 2021 also provides a list of exclusions for land that is considered not to fall in the category of being previously developed.
	Primary Shopping Area	An area where retail development is concentrated.



Abbreviation	Term	Explanation
	Priority Habitat	Cover a wide range of semi-natural habitat types and are habitats identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan (UK BAP).
	Renewable Energy	Energy from natural resources that can be naturally replenished, such as sunlight, wind or rain. Examples of renewable energy technologies include wind turbines and photovoltaics.
	Rural Exception Housing Site	Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. Small numbers of market homes may be allowed at the local authority's discretion, for example where essential to enable the delivery of affordable units without grant funding.
	Section 106 Agreement	An agreement under Section 106 of the Town and County Planning Act which contains legally enforceable obligations to mitigate the impact of development proposals.
	Self-Build and Custom Housebuilding Register	The Self-Build and Custom Housebuilding Act 2015 places a duty on local councils in England to keep and have regard to a register of people who are interested in self-build or custom-build projects in their area.



Abbreviation	Term	Explanation
	Self-build/Custom Build	Self-Build refers to projects where an individual or an association of individuals directly organises the design and construction of new homes. Custom build refers to projects where an individual or an association of individuals work with a specialist developer to deliver new homes.
	Settlement Boundary	The boundary set in a Local Plan around settlements in the Borough.
SINC	Site of Importance for Nature Conservation	Sites of Importance for Nature Conservation (SINCs) are a series of non-statutory local sites designated to seek to ensure, in the public interest, the conservation, maintenance and enhancement of species and habitats of substantive nature conservation value.
S.S.S.I	Sites of Special Scientific Interest	Areas of special interest by reason of their flora, fauna, geological or physiological features. They are protected under the Wildlife and Countryside Act.
	Small and Medium-Sized Enterprise	A small business, which has no single definition. It can be based on the number of employees, turnover, balance sheet information or audit threshold. Some definitions are based on a maximum of 250 employees.
SAC	Special Areas of Conservation	Annex 2 (Glossary) of the NPPF 2021 states that Special Areas of Conservation (SACs) are strictly protected sites defined by regulation 3 of the Conservation of Habitats and Species Regulations 2017 which have been given special protections as important conservation sites.



Abbreviation	Term	Explanation
	Specialist Housing	Housing specifically designated to meet the identified needs of older people and people with support needs. It can include extra care housing.
	Step up Town	The Enterprise M3 Local Enterprise Partnership (LEP) sets out that a Step up Town is one that with the right investment, has the potential to contribute more to the economy.
SCI	Statement of Community Involvement	The Statement of Community Involvement (SCI) sets out the Council's approach for involving the community in the preparation and revision of local development documents and planning applications.
	Strategic Employment Area	Areas which contain sites that are considered to fulfil a strategic economic function within the Functional Economic Area (FEA).
SEA	Strategic Environmental Assessment	Strategic Environmental Assessment (SEA) is the process by which environmental considerations are required to be fully integrated into the preparation of plans and programmes. In plan making it is usually incorporated into the Sustainability Appraisal document.
SFRA	Strategic Flood Risk Assessment	A study that provides information on the probability of flooding from all sources, such as that from rivers, surface water, groundwater and sewers. The SFRA is used to ensure that, in allocating land or determining applications, development is located in areas at lowest risk of flooding.



Abbreviation	Term	Explanation
SHMA	Strategic Housing Market Assessment	An assessment of the estimated demand for market housing and need for affordable housing in a defined geographical area, in terms of distribution, house types and sizes and the specific requirements of particular groups and which considers future demographic trends.
SLAA	Strategic Land Availability Assessment	The SLAA identifies parcels of land and assesses their suitability, availability and viability for residential, economic and other uses to meet Surrey Heath's needs over a 15 year period. The SLAA does not make decisions about which sites should be allocated for development.
SRN	Strategic Road Network	The road network of trunk roads and motorways managed by Highways England.
SANG	Suitable Alternative Natural Green Space	SANGs are areas that currently are not in use for recreation and so are a new alternative provision or are existing areas that are significantly under-used and so have the capacity to absorb additional recreational use. SANGs are a central element of the Council's Avoidance and Mitigation Strategy for the protection of the Thames Basin Heaths SPA.
SPD	Supplementary Planning Document	These are documents produced by the Council that provide further information and additional detail to the policies within the Local Plan.



Abbreviation	Term	Explanation
SA/SEA	Sustainability Appraisal incorporating a Strategic Environmental Assessment	A Sustainability Appraisal (SA) is a tool used to appraise planning policy documents in order to promote sustainable development. Social, environmental and economic aspects are all taken into consideration. Sustainability Appraisal (SA) is a compulsory requirement under the 2004 Planning and Compulsory Purchase Act and the 2001/42/EEC European Directive.
	Sustainable Development	There is no definitive or legal definition of sustainable development. The Brundtland Commission (1987), formerly the World Commission on Environment and Development, defines sustainable development as ' <i>development that meets the needs of the present without compromising the ability of future generations to meet their own needs</i> '.
SuDS	Sustainable Drainage System	The term Sustainable Drainage Systems covers the range of drainage elements for managing surface water in a way which is more sympathetic to the natural and human environment than conventional below-ground drainage systems.
	Sustainable Transport Modes	Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low- and ultra-low emission vehicles, car sharing and public transport.
	Tenure	Housing tenure describes the status under which people occupy their accommodation.



Abbreviation	Term	Explanation
SPA	Thames Basin Heaths Special Protection Area	A European designated site which has been identified as being of international importance for the breeding, feeding, wintering or migration of rare and vulnerable species of birds. The Thames Basin Heaths SPA includes areas of heathland across Surrey, Hampshire and Berkshire.
	Town Centre	A principal centre that provides major retail, service, leisure, entertainment, cultural and other town centre uses, together with employment and housing. In Surrey Heath the main town centre is Camberley
TA	Transport Assessment	A study of the patterns of movement around the Borough by all modes of transport. A transport assessment can also set out transport issues relating to a proposed development, identifying measures required to improve accessibility and safety for all modes of travel. The study tests the impacts of Local Plan development on the transport infrastructure in the Borough, including a defined highway network. It forms part of the evidence base for the Local Plan.
	Travelling Showpeople	Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.



Abbreviation	Term	Explanation
	Viability Assessment	A financial appraisal of the profit or loss arising from a proposed development, taking into account the estimated value of a scheme when completed and the building cost and other development costs incurred in delivering a scheme. A Viability Assessment can also relate to the viability of a set of policies and form part of the local plan evidence base.
	Vitality	An overall measure of the health of a town centre.
WCS	Water Cycle Study	The purpose of the Water Cycle Study (WCS) is to seek to ensure that future development does not have a damaging effect on the water environment across the study area.
	Windfall Sites	Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously developed sites that have unexpectedly become available.



12. Appendix 2: Housing Trajectory

Table 11 – Housing Trajectory

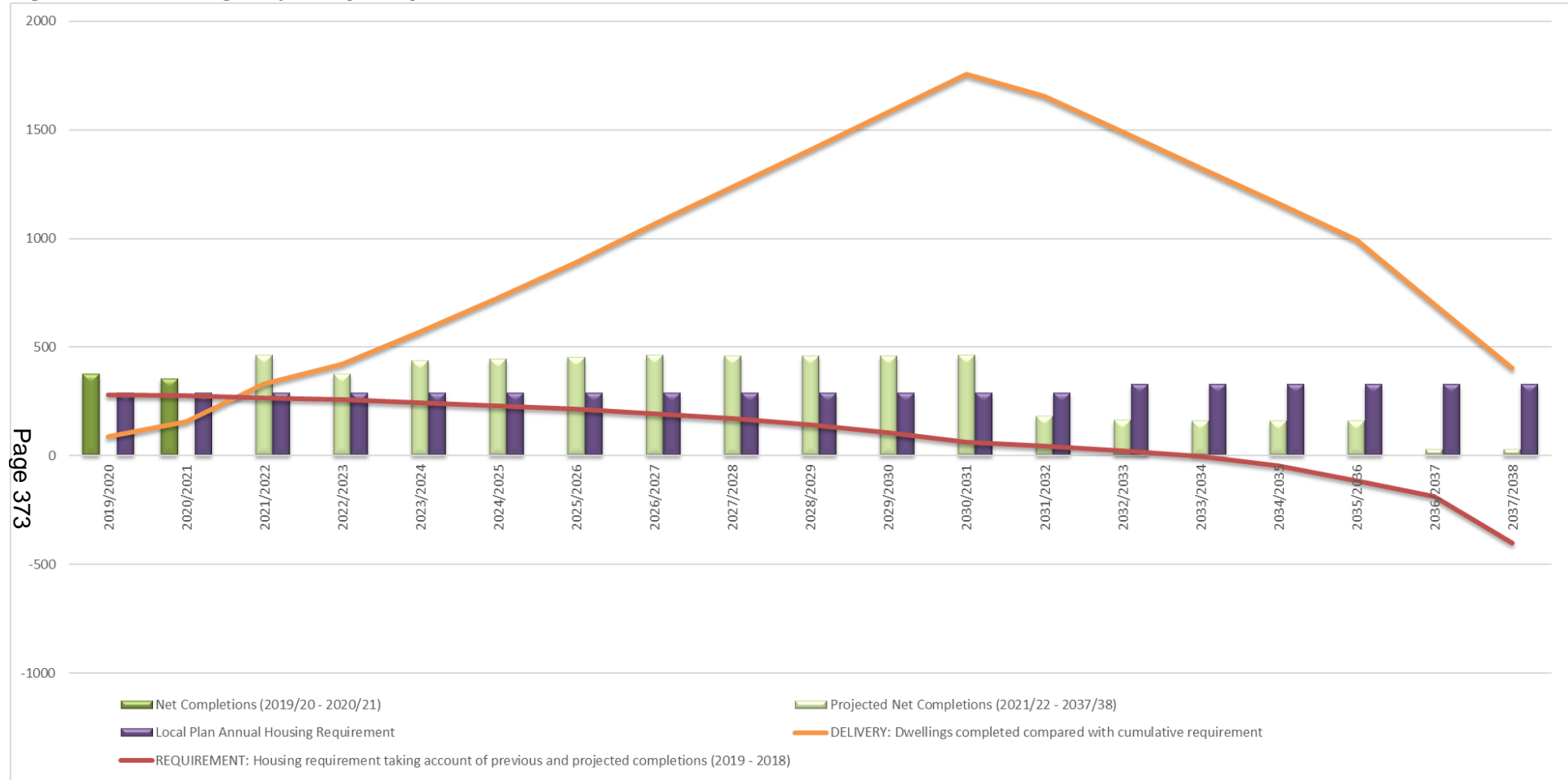
Housing Trajectory

Category	Past completions	1 - 5 YEARS					6 - 10 YEARS					11 - 15 YEARS					16 - 17 YEARS		Total
	2019/20 - 2020/21	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	2031/2032	2032/2033	2033/2034	2034/2035	2035/2036	2036/2037	2037/2038	
Completions	728	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	728
C3 Outstanding capacity (Commenced)	0	460	376	172	171	171	107	107	107	107	107	20	0	0	0	0	0	0	1905
C3 Outstanding capacity (Approved) - detailed permissions	0	0	0	80	80	83	0	0	0	0	0	0	0	0	0	0	0	0	243
C3 Outstanding capacity (Approved) - outline permissions	0	0	0	38	39	39	13	12	12	13	13	0	0	0	0	0	0	0	179
Care Homes (C3 equivalent) - detailed permissions	0	0	0	27	27	28	6	6	6	7	7	0	0	0	0	0	0	0	113
Lapse Rate Application (-3%) on non-commenced Permissions	0	0	0	4	4	5	1	1	1	0	0	0	0	0	0	0	0	0	16
SLAA sites																			
Care Homes (C3 equivalent)	0	0	0	17	18	19	2	2	2	2	2	6	6	6	7	7	0	0	96
Windfall (Small Sites, Prior Notifications, and Rural Exception Sites)	0	0	0	30	30	31	30	30	30	31	32	30	30	30	31	32	30	30	457
Bagshot	0	0	0	4	5	5	24	24	24	24	24	0	0	0	0	0	0	0	134
Bisley	0	0	0	5	6	6	2	1	1	1	1	2	2	2	2	1	0	0	32
Camberley	0	0	0	1	2	2	187	187	187	187	187	95	95	95	95	95	0	0	1415
Chobham	0	0	0	2	3	3	22	21	21	21	21	0	0	0	0	0	0	0	114
Deepcut	0	0	0	0	0	0	16	16	16	16	16	10	10	10	9	9	0	0	128
Frimley	0	0	0	0	0	0	41	41	41	41	41	0	0	0	0	0	0	0	205
Frimley Green	0	0	0	53	53	54	0	0	0	0	0	4	4	3	3	3	0	0	177
Lightwater	0	0	0	5	6	6	0	0	0	0	0	0	0	0	0	0	0	0	17
Mylott	0	0	0	0	0	0	4	3	3	3	3	2	2	1	1	1	0	0	23
West End	0	0	0	0	0	0	5	5	5	4	4	15	15	15	14	14	0	0	96
Winkham	0	0	0	6	7	7	4	3	3	3	3	0	0	0	0	0	0	0	36
Total housing provision	728	460	376	436	443	449	462	457	457	459	461	184	164	162	162	162	30	30	6082
Total within each period	728			2164					2296				834				60		6082

Category	PREVIOUS DELIVERY		1 - 5 YEARS					6 - 10 YEARS					11 - 15 YEARS					16 - 17 YEARS	
	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	2031/2032	2032/2033	2033/2034	2034/35	2035/36	2036/37	2037/38
Net completions (2019-2021)	376	352	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Projected net completions (2021-2038)	0	0	460	376	436	443	449	462	457	457	459	461	184	164	162	162	30	30	30
Cumulative completions (past and projected)	376	728	1188	1564	2000	2443	2892	3354	3811	4268	4727	5188	5372	5536	5698	5860	6022	6052	6082
Cumulative annual target	286	572	858	1,144	1430	1716	2002	2288	2574	2860	3146	3432	3718	4045	4372	4699	5026	5353	5680
PLAN: Annual target	286	286	286	286	286	286	286	286	286	286	286	286	286	327	327	327	327	327	327
MONITOR: Dwellings completed above or below cumulative target	90	156	330	420	570	727	890	1066	1237	1408	1581	1756	1654	1491	1326	1161	996	699	402
MANAGE: Housing requirement taking account of past and projected completions 2019-2038	279	275	264	257	245	231	214	194	170	141	106	62	44	24	-4	-45	-114	-186	-402



Figure 12 – Housing Trajectory Graph



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13. Appendix 3: Strategic Policies for the Purpose of Neighbourhood Plans

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

Spatial Strategy

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

Housing

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

Economy and Town Centre Uses

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

Infrastructure

- IN1 Infrastructure Delivery
- IN2 Transportation
- IN4 Community Facilities



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

Environment

E1 Thames Basin Heaths SPA
E2 Biodiversity and Geodiversity
E3 Biodiversity Net Gain
E6 Flood risk and sustainable drainage systems

Green Belt and Countryside

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

Design and Heritage

DH1 Design Principles
DH7 Heritage Assets



14. Appendix 4 – Saved Policies to be superseded by the Surrey Heath Local Plan (2019 – 2038)

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

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

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

Table 12 – Superseded Policies

Draft Surrey Heath Local Plan: Preferred Options (2019 – 2038) Policy	Existing Policy Source: Saved Local Plan (SLP) Core Strategy (CS) Camberley Town Centre AAP (AAP)	Policies to be superseded
Spatial Strategy		
SS1: Spatial Strategy	Core Strategy	CP1: Spatial Strategy CP3: Scale and Distribution of new housing CP9: Hierarchy and role of centres CP10: Camberley Town Centre
	Camberley Town Centre Area Action Plan	TC4: Housing
SS2: Presumption in Favour of Sustainable Development	Core Strategy	CP2: Sustainable Development and Design
SS3a: Climate Change Mitigation	Core Strategy	CP2: Sustainable Development and Design DM7: Facilitating Zero Carbon Development
SS3b: Climate Change Adaptation	Core Strategy	CP2: Sustainable Development and Design DM7: Facilitating Zero Carbon Development



Housing		
HA1: Housing Allocations	Core Strategy	CP3: Scale and Distribution of new housing
	Saved Local Plan	H3: Housing Allocation Sites 2001 – 2006 H6: Land at Notcutts Nursery and Woodside Cottage, Bagshot H8: Housing Reserve Sites E8: Land at Half Moon Street Bagshot
	Camberley Town Centre Area Action Plan	TC4: Housing TC15: Camberley Station TC19: Former Magistrates Court
HA2: London Road Block	Camberley Town Centre Area Action Plan	TC14: London Road Block
HA3: Land East of Knoll Road	Camberley Town Centre Area Action Plan	TC18: Land East of Knoll Road
HA4: Mindenhurst, Deepcut	Core Strategy	CP4: Deepcut
	Saved Local Plan	H3: Housing Allocation Sites 2001 - 2006
H5: Range and Mix of Housing	Core Strategy	CP6: Dwelling Size and Type
H6: Specialist Housing	Core Strategy	CP6: Dwelling Size and Type
H7: Affordable Housing	Core Strategy	CP5: Affordable Housing
H8: Loss of Housing		No specific existing policy
H9: Rural Exception Sites	Core Strategy	DM5: Rural Exception Sites
H10: First Homes Exception Sites		No specific existing policy
H11: Gypsies and Travellers and Travelling Showpeople (criteria based)	Core Strategy	CP7: Gypsies and Travellers and Travelling Showpeople DM6: Gypsy and Traveller and Travelling Showpeople Accommodations
HA11A: Gypsy and Traveller allocations	Core Strategy	CP7: Gypsies and Travellers and Travelling Showpeople



Economy and Town Centre Uses		
CTC1: Camberley Town Centre	Camberley Town Centre Area Action Plan	TC1: General Policy for new development within the Town Centre TC2: Retail Development TC3: Food and Drink TC5 Employment TC6: Leisure, Community and Cultural Uses TC11: General Design TC12: High Street Character Area TC13: The Public Realm
	Core Strategy	CP10: Camberley Town Centre
CTC2: Camberley Town Centre Primary Shopping Area	Camberley Town Centre Area Action Plan	TC2: Retail Development
CTC3: Camberley Town Centre Movement and Accessibility	Camberley Town Centre Area Action Plan	TC7: Accessibility TC8: Improvements to the Highway network
ER1: Economic Growth and Investment	Core Strategy	CP8: Employment DMI3: Employment Development outside Core Employment Areas & Camberley Town Centre
	Camberley Town Centre Area Action Plan	TC5: Employment
ER2: Strategic Employment Sites	Core Strategy	CP8: Employment
	Saved Local Plan	RE17: Major Developed Sites in the Green Belt
ER3: Locally Important Employment Sites	Core Strategy	CP8: Employment
	Saved Local Plan	RE17: Major Developed Sites in the Green Belt M21: Development at Fairoaks Airport
ER4: Yorktown Business Park	Core Strategy	CP8: Employment



ER5: The Rural Economy	Core Strategy	DMI: The Rural Economy
ER6: Frimley Park Hospital		No site specific existing policy
ER7: Edge of Centre and Out of Centre Proposals	Saved Local Plan	TC1: Maintaining and Enhancing the role of the Town Centre
ER8: District Centres and Local Centres	Core Strategy	DMI2: District and Local Centres and neighbourhood Parades
ER9: Neighbourhood Parades	Core Strategy	DMI2: District and Local Centres and Neighbourhood Parades
ER10: Old Dean		No specific existing policy
Infrastructure		
IN1: Infrastructure Delivery	Core Strategy	CPI2: Infrastructure Delivery and Implementations
IN2: Transportation	Core Strategy	CPI 1: Movement DMI 1: Traffic Management and Highway Safety
IN3: Digital Infrastructure and telecommunications	Core Strategy	CPI2: Infrastructure Delivery and Implementations DM9: Design Principles
IN4: Community Facilities	Core Strategy	DMI4: Community & Cultural Facilities
IN5: Green Infrastructure	Core Strategy	CPI3: Green infrastructure
IN6: Green Space	Core Strategy	DMI6: Provision of Open Space and Recreational Facilities
IN7: Indoor and Built Sports and Recreational Facilities	Core Strategy	DMI6: Provision of Open Space and Recreational Facilities
IN8: Safeguarded land – Land at the Sturt Road “chord”, Frimley Green	Saved Local Plan	M18: Safeguarded land for Future Transport Provision



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



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

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

Delete

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



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Draft Surrey Heath Local Plan: Preferred Options (2019 – 2038)

Mapping Booklet

Proposed Changes to the Adopted Policies Map



February 2022

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Introduction

- I.1. This document should be read alongside the Draft Surrey Heath Local Plan Preferred Options (2019 -2038). It shows how the ‘adopted policies map’ would be amended by the policies within the emerging Local Plan. This Mapping booklet forms part of the consultation on the Draft Local Plan taking place between 14 March 2022 and 09 May 2022. Further information on this consultation and how to respond can be found on the Council’s website at [xx](#).

The adopted policies maps currently show policy and allocation boundaries for the:

- Adopted Surrey Heath Core Strategy and Development Management Policies 2011 – 2028;
- Adopted Camberley Town Centre Area Action Plan; and
- Saved policies in the Surrey Heath Local Plan 2000

The current Policies Maps can be viewed at (links):

- Saved Local Plan Policies and Core Strategy and
- Camberley Town Centre AAP

This Mapping Booklet is split into the following sections:

- 1) Tables showing mapping changes that would be made to the existing Development Plan policies maps
- 2) Schedule of new or amended policy boundary maps
- 3) Maps 1-92

The Mapping changes include changes to settlement boundaries either to reflect new development that has taken place since the boundaries on the current Policies Maps were drawn, proposed Draft local plan allocations, or to make factual updates. The Local Area Profile Maps are included within the Draft Local Plan in Section 9.



Section I Amendments to the Adopted Policies Maps

Note – Existing boundaries which are to be deleted can be viewed on the existing Policies Maps (see previous links to maps) and are not shown in this Mapping Booklet.

Table I Amendments to the Saved Surrey Heath Local Plan 2000 Policies Map Boundaries

Designation	Adopted Local Plan 2000 Policy	Proposed Action and Draft Plan Policy Reference	Boundary Changes Map Reference
Major Developed Site in the Green Belt i. The DERA test and Evaluation Centre, Chobham Lane, Longcross	RE17	Policy deleted Boundary retained - DERA site identified as a Strategic Employment Site under Policy ER2	Map 1
ii. Gordons School, West End		Boundary amended to reflect permission for sports hall granted in 2018 – Gordons School covered under Policy GBC5	Map 2 and 3
iii. Fairoaks Airport		Boundary amended to reflect addition of Chobham Business Centre – Fairoaks identified as a Locally Important Employment Site under Policy ER3	Map 4 and 5



Major Highway Proposal (a) A322 (Bisley) Southern Extension; and (b) A325, Frimley Roundabout.	M1	Deleted - no replacement policy proposed.	N/A
Additional car parking: On land to the rear of the Parade, Frimley as shown on the Proposals Map; and On land to the rear of Half Moon Street and High Street, Bagshot as part of any major redevelopment of the land.	M4	Deleted proposals. Superseded by planning consents.	N/A
Rear service roads: To the rear of Nos. 423-469 London Road, Yorktown; To the rear of Nos. 319-369 London Road and I-13 Frimley Road, Camberley; To the rear of Nos. 279-299 London Road, Camberley; and At Land to the rear of Half Moon Street/High Street, Bagshot	M9	Deleted – no replacement policy proposed.	N/A
Employment Revitalisation Areas Nos.279-299 London Road and nos. 309-369 London Road with nos I- 17 Frimley Road, Camberley; and Nos 411-543 London Road, Yorktown, Camberley.	E6	Deleted - no replacement policy proposed.	N/A



Land at Half Moon Street Bagshot	E8	Deleted. This site has planning permission permitted and is no longer allocated. The site has come forward as smaller parcels of land which has included the planning application 18/083 granted for 42-44 London Road.	N/A
Land for future public transport provision Land at the Sturt Road "chord", Frimley Green	M18	Retain under Policy IN8	No change

Table 2 Amendments to the Core Strategy and Development Management Policies Map boundaries

Designation	Adopted Core Strategy Policy	Proposed Action and Draft Plan Policy Reference	Boundary Changes Map reference
Sites of Special Scientific Interest: Ash to Brookwood Heath Basingstoke Canal Broadmoor to Bagshot Woods and Heaths Chobham Common Colony Bog to Bagshot Heath	CPI4 A+B	Boundary changes to reflect current mapping designation of Natural England on 18.11.21. Retained under Policy reference E1 and E2.	Map 8



Special Areas of Conservation	CPI4A and B	Boundary change to reflect current mapping designation of Natural England on 12.10.21 Retained under Policy reference E1 and E2	Map 9
Special Protection Area	CPI4A and B	Boundary change to reflect current mapping designation of Natural England on 29.06.21 Retained under Policy reference E1 and E2	Map 10
Site of Nature Conservation Importance	CPI4A and B	No boundary change Retained under Policy reference E1 and E2	No change
National Nature Reserve	CPI4A +B	Boundary changes to reflect current mapping designation of Natural England on 26.11.21 Retained under Policy reference E1 and E2	Map 11
Area of High Archaeological Potential	DM17	Boundary changes to reflect amended and new Areas of Archaeological Potential Retained under Policy reference DH7	Maps 12-32
Conservation Areas	DM17	No boundary change Retained under Policy reference DH7	No change
Potential Site of Nature Conservation Importance	CPI4A+B	Deleted designation.	Boundaries deleted
Countryside beyond the Green Belt	CPI/DM1/DM3/DM6)	Boundary changes to reflect developments, permissions, allocations and factual corrections. Retained under Policy reference SSI/GBC4	Map 33
Settlement Area		Boundary changes to reflect developments, permissions,	Map 33 and 93



		allocations and factual corrections. Revision of Chobham settlement boundary. Policy reference SS1	
Green Belt	CPI/DM2	Boundary changes to reflect the exclusion of Chobham village from the Green Belt in line with the findings of the Chobham Village Green Belt Study 2022. Policy reference SS1	Map 33 and 34
Local Shopping Centre/Parade	CP9/DM1 2	Boundary changes to reflect changes in national Policy. Policy reference ER8 and ER9	Maps 35 to 58
Green space within settlement areas	DM15	Boundary changes to reflect 2018 Green Space background paper. Policy reference IN6	Changes shown in the 2018 Green Spaces background document.
Historic Parks	DM17	Addition of Frimley Park Retained under Policy reference DH7	Map 59
Deepcut boundary (Mindenhurst)	CP4	Amended boundary to reflect planning permission. Retained under Policy reference HA4	Map 60 and 61.
Core Employment Area	CP8	Replaced by Strategic and Locally Important Employment Areas Policy reference ER2 and ER3	New designations shown on Maps 62 to 72
Employment Revitalisation Areas	CP8	Policy deleted	Policy boundary will be deleted.
Frimley Primary Shopping Area	CP9/DM1 2	Amendments proposed Retained under Policy reference ER8	Maps 37 and 38
Bagshot Primary Shopping Area	CP9/DM1 2	Amendments proposed Retained under Policy reference ER9	Maps 35 and 36



Scheduled Ancient Monument	DMI7	No boundary change Retained under Policy reference DH7	No change
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Table 3 Amendments to the Camberley Town Centre Area Action Plan Proposals Map

Designation	Adopted AAP Policy	Proposed Action and Draft Plan Policy Reference	Boundary Changes Map reference
Primary shopping frontages		Boundary changes and replaced as CTC 2	Map 73
Secondary shopping frontages		Policy Deleted	Policy Boundary will be deleted.
High Street Character Area	TC12	Policy Deleted	N/A
Knoll Road Commercial Area (Employment)	TC5	Boundary changes and replaced as ER2 Strategic Employment Area.	Map 62
Camberley Station (Site Allocation)	TC15	Boundary changes and replaced by HA1/06 housing allocation	Map 75
The Granary	TC20	Policy Deleted	Policy Boundary will be deleted.
Land East of Knoll Road (site allocation)	TC15	Boundary changes and replaced by Policy HA3 housing site allocation	Map 76
Land at Park Lane	TC16	Policy Deleted	Policy Boundary will be deleted.
Highway Improvements	TC8	Policy Deleted	N/A
Pembroke Broadway	TC17	Policy Deleted	Policy Boundary will be deleted.
Pedestrian Friendly Area	TC9	Policy Deleted	N/A



Former Magistrates Court	TC19	Policy Deleted	Policy Boundary will be deleted
Improved pedestrian route	TC9	Policy Deleted	N/A
London Road Block	TC14	Boundary Changes and replaced by Policy HA2 housing site allocation	Map 77



Section 2 Schedule of new or amended Policy boundary Maps

Table 4 Proposed new/amended mapping designations in the Draft Surrey Heath Local Plan

Designation	Local Plan Policy Reference	Map Number
Spatial Strategy		
Settlement Boundaries and Chobham settlement boundary revision.	SSI	Map 33 and 93
Countryside beyond the Green Belt changes	SSI	Map 33
Green Belt Boundary revisions	SSI	Map 34
Housing		
Housing Allocations		
134 and 136 London Road, Bagshot	HA1/01	Map 78
Bagshot Highway Depot and Archaeology Centre, London Road, Bagshot	HA1/02	Map 79
Land East of Park Street, North of Princess Way	HA1/03	Map 80
84-100 Park Street, Camberley	HA1/04	Map 81
Camberley Centre, France Hill Drive, Camberley	HA1/05	Map 82
Camberley Station, Station House, Pembroke Broadway, Camberley	HA1/06	Map 75
York Town Car Park, Sullivan Road, Camberley	HA1/07	Map 83
Land at Frimhurst Farm, Deepcut Bridge Road, Deepcut	HA1/08	Map 84
Sir William Siemens Square, Frimley	HA1/09	Map 85
Land West of Sturt Road, Frimley Green	HA1/10	Map 86
Land East of Benner Lane (partial housing reserve site), West End	HA1/11	Map 87



Housing Reserve Site East of Heathpark Drive, Windlesham	HA1/12	Map 7
Chobham Rugby Club, Windsor Road, Chobham	HA1/13	Map 88
Pinehurst 141 Park Road, Camberley	HA1/14 – site promoted for extra care or residential care uses.	Map 89
London Road Block	HA2	Map 77
Land East of Knoll Road	HA3	Map 76
Mindenhurst, Deepcut	HA4	Map 61
Green Belt and Countryside		
Gordons School	GBC5	Map 3
Infrastructure		
Green Infrastructure – Green Spaces	IN5	Changes shown in the 2018 Green Spaces background document
Green Infrastructure - SANGS	IN5	Map 90
Environment		
Biodiversity and Geodiversity – Site of Special Scientific Interest (SSSI)	E1 and E2	Map 8
Biodiversity and Geodiversity – Special Areas of Conservation (SAC)	E1 and E2	Map 9
Thames Basin Heaths Special Protection Area	E1 and E2	Map 10
Flood Risk and Sustainable Drainage Systems	E6	Map 91
Areas of High Archaeological Potential		
WWII POW camp, Brick hill, Chobham	DH7	Map 12
Romano British Finds, Whitwell Farm, Frimley Green	DH7	Map 13
Roman Road, Devils Highway, Windlesham	DH7	Map 14



Organic environmental sequence, Park Street, Camberley	DH7	Map 15
Military earthworks, Ship Hill, Chobham	DH7	Map 16
Medieval watermill, Emmetts Mill, Philpot Lane, Chobham	DH7	Map 17
Medieval watermill, Hook Mill, West End	DH7	Map 18
Medieval moated site, Corner of Clappers Lane and Bagshot Road, Chobham	DH7	Map 19
Late Roman findspots, west of Queenswood farm golf club, Chobham	DH7	Map 20
Langshott Bog, Chobham	DH7	Map 21
Enclosure of possible Roman date, Pennyhill, Bagshot	DH7	Map 22
19 th Century military earthwork, Staples hill, Chobham	DH7	Map 23
19 th Century military earthwork. Oystershell hill, Chobham	DH7	Map 24
Bagshot Historic Town Core	DH7	Map 25
Bisley Historic Town Core	DH7	Map 26
Chobham Historic Town Core and 11 th Century Church of St Lawrence	DH7	Map 27
Frimley Historic Town Core	DH7	Map 28
St John Baptist Church Bisley	DH7	Map 29
St Johns Baptist Well Bisley	DH7	Map 30
Windlesham Historic Town Core	DH7	Map 31
Possible barrow, West Pipers Green Farm, Chobham	DH7	Map 32
Historic Park and Gardens		
Frimley Park Historic Park and Garden	DH7	Map 59
Employment Boundary changes: Strategic Employment Sites		
Former Defence Evaluation and Research Agency (DERA) site, Longcross	ER2	Map 1
Camberley Town Centre	ER2	Map 62
Erl Wood, Windlesham	ER2	Map 63



Former British Oxygen Site, Windlesham	ER2	Map 64
Albany Park, Frimley	ER2	Map 65
Frimley Business Park, Frimley	ER2	Map 65
Lyon Way, Frimley	ER2	Map 65
Mytchett Place, Mytchett	ER2	Map 66
Admiralty Park, Camberley	ER2	Map 67
Watchmoor Business Park, Camberley	ER2	Map 67
Yorktown Business Park, Camberley	ER2 and ER4	Map 67
Locally Important Employment Sites		
Fairoaks Airport Employment land	ER3	Map 5
Bridge Road Trade and Industrial Park, Camberley	ER3	Map 68
Linsford Business Centre, Mytchett	ER3	Map 69
SC Johnson, Frimley Green	ER3	Map 70
St George's Industrial Estate and Helix Business Park, Camberley	ER3	Map 71
Tanners Yard, Bagshot	ER3	Map 72
Frimley Park Hospital	ER6	Map 74
Retail/centre boundary changes:		
Bagshot District Centre	ER8	Map 36
Frimley District Centre	ER8	Map 38
Chobham Local Centre	ER8	Map 40
Deepcut Neighbourhood Centre	ER8	Map 42
Frimley Green Local Centre	ER8	Map 44
Lightwater Local Centre	ER8	Map 46
Windlesham Local Centre	ER8	Map 48
Bisley Neighbourhood Parade	ER9	Map 50
Frimley Road/London Road Neighbourhood Parade	ER9	Map 52
Mytchett Neighbourhood Parade	ER9	Map 54
Old Dean Neighbourhood Parade	ER9	Map 56
Watchetts Local Centre	ER8	Map 58



Old Dean	ER10	Map 56
Gypsy and Travelling Showpeople accommodation		
Diamond Ridge Woods	H11/H12	Map 92
Local Area Profiles		See Section 12 of the Draft Local Plan.

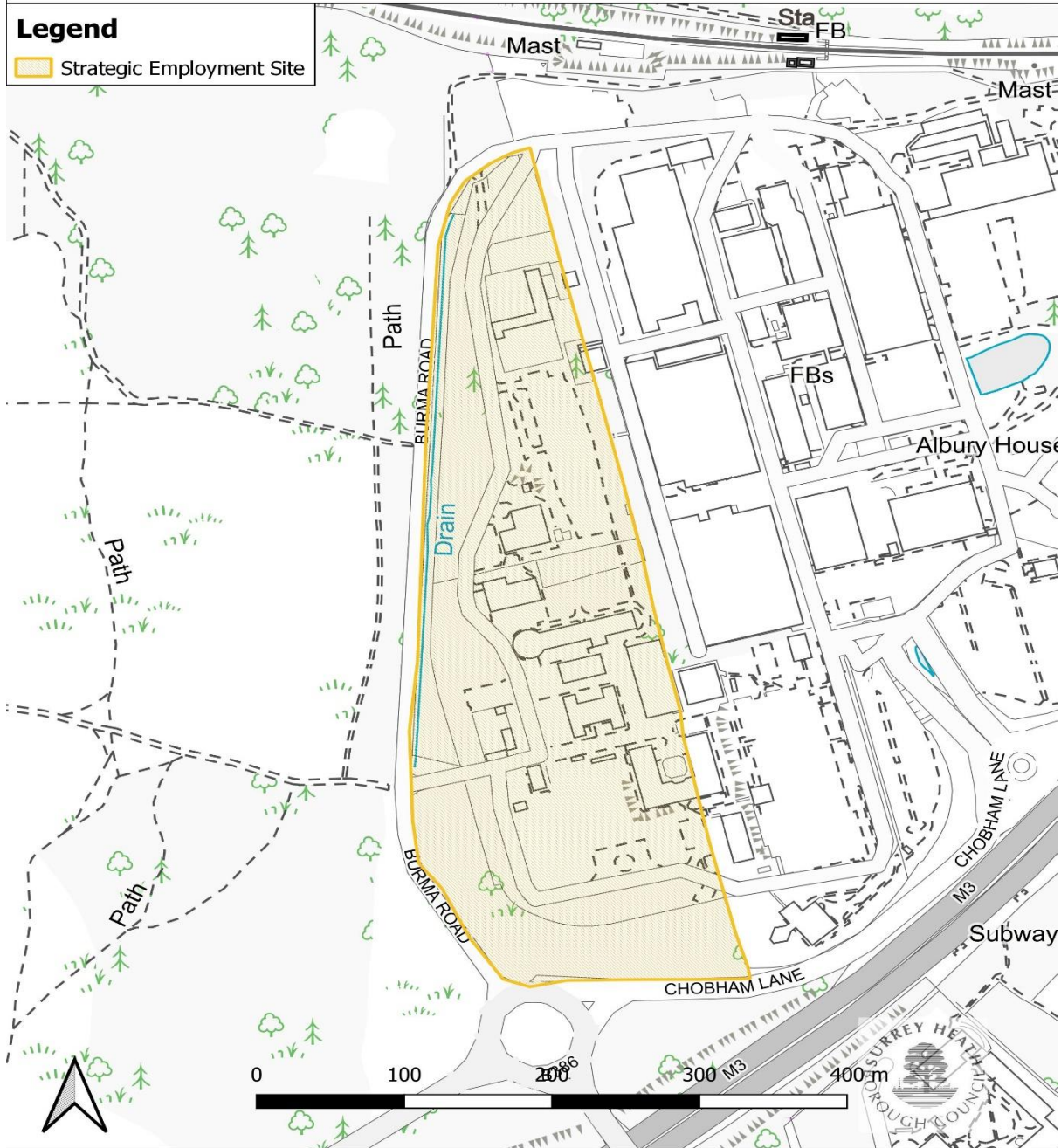


Section 3 Mapping Changes

Map I.

Policy ER2 Strategic Employment Sites, Former DERA site, Longcross near Chobham

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Map 2.



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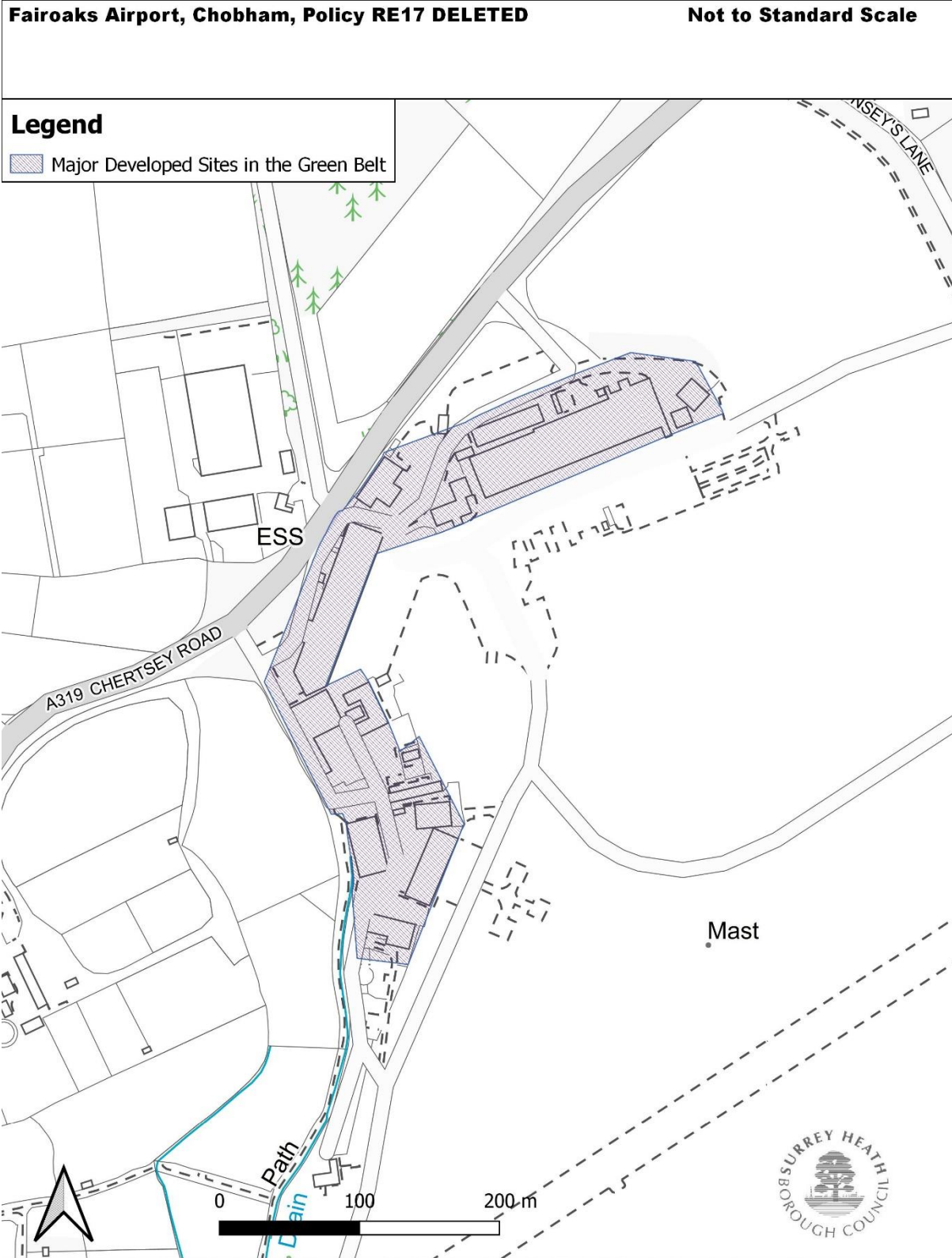
Map 3.



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Map 4.



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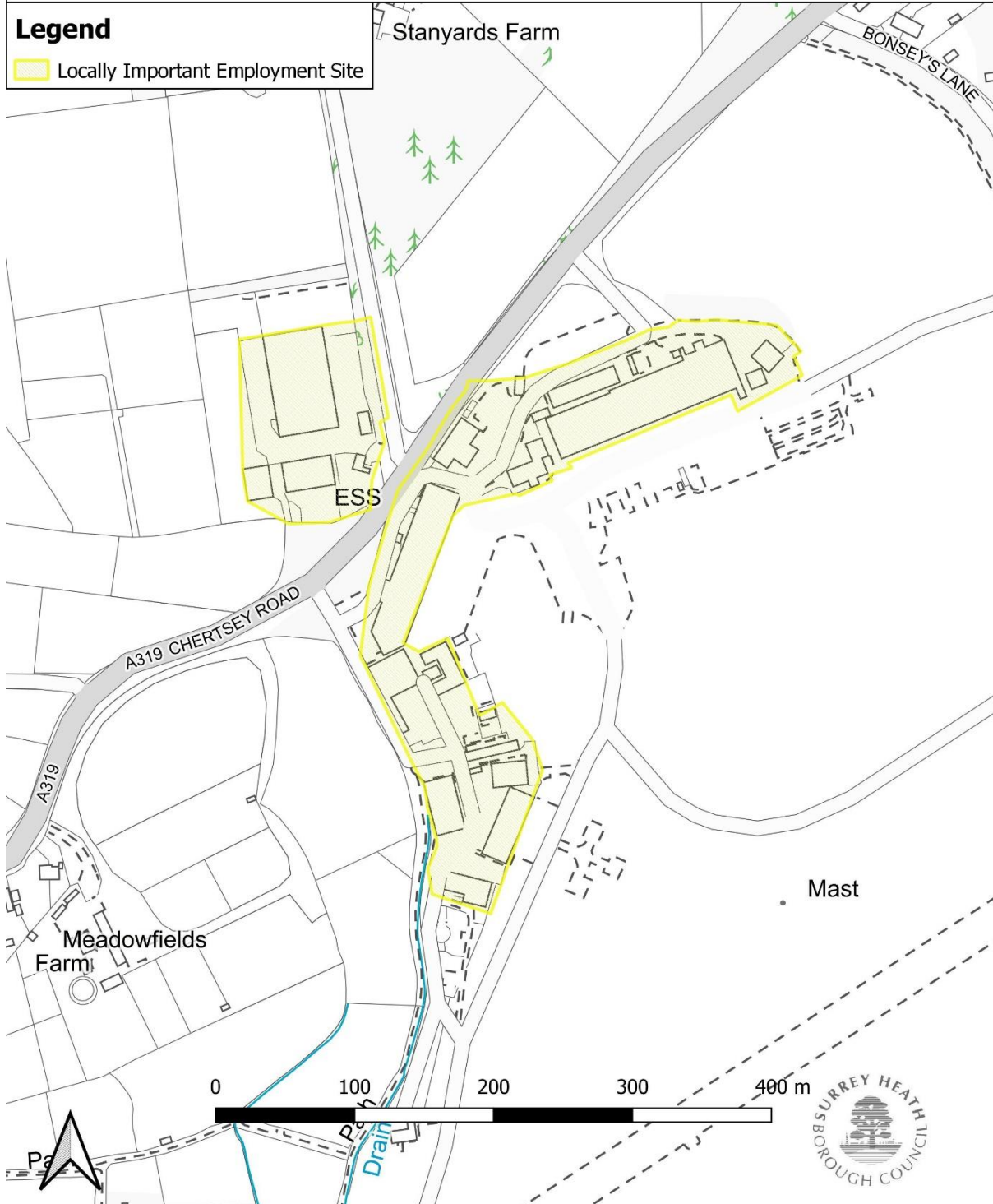
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Map 5.

Policy ER3 Locally Important Employment Site, Fairoaks Airport Not to Standard Scale



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Map 6.

Policy H8 Housing Reserve Sites, Land east of Heathpark Drive, Windlesham - Partial Amendment to Policy HA1/12

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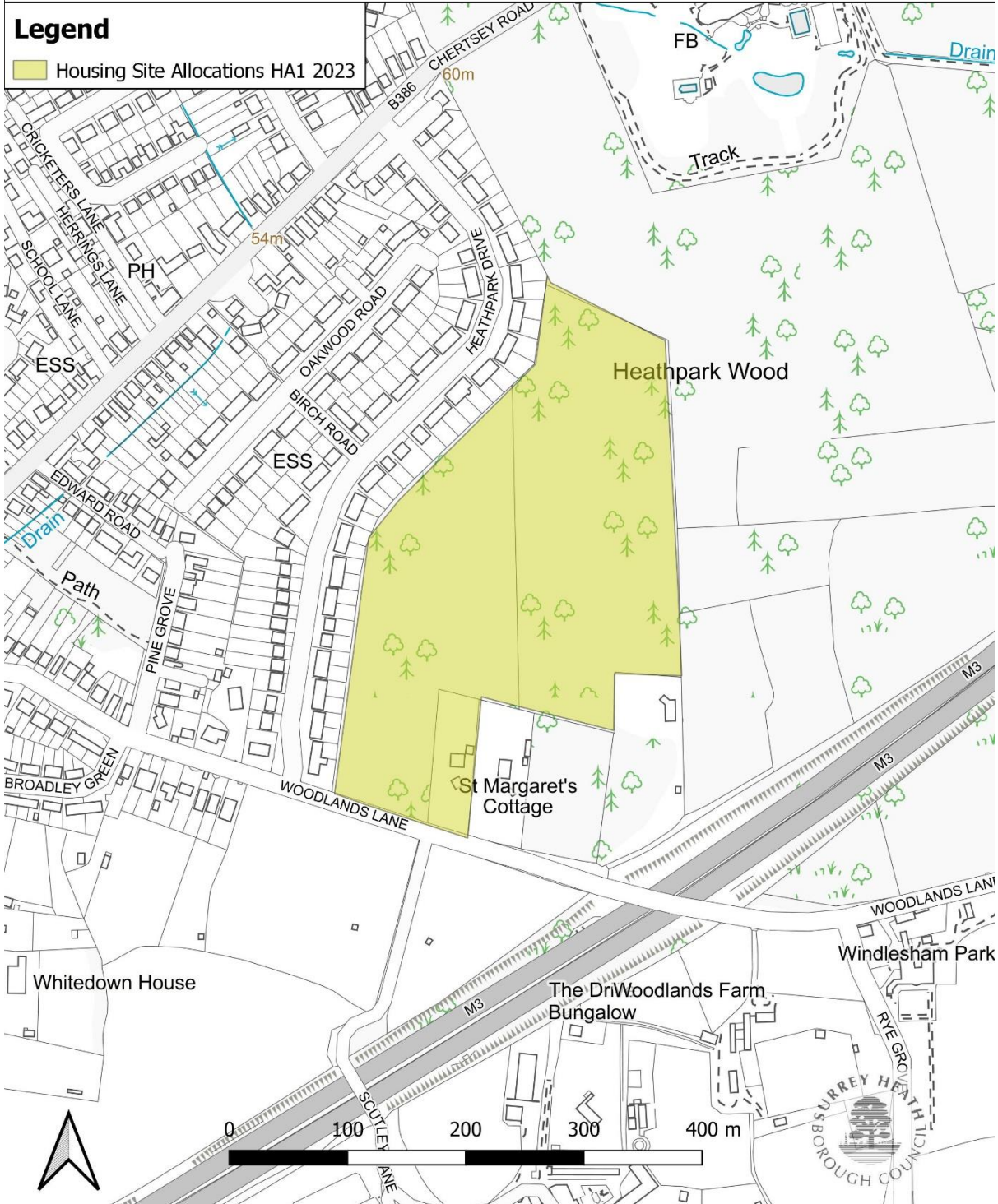
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Map 7.

Policy HA1/12 Housing Reserve Site East of Heathpark Drive, Windlesham
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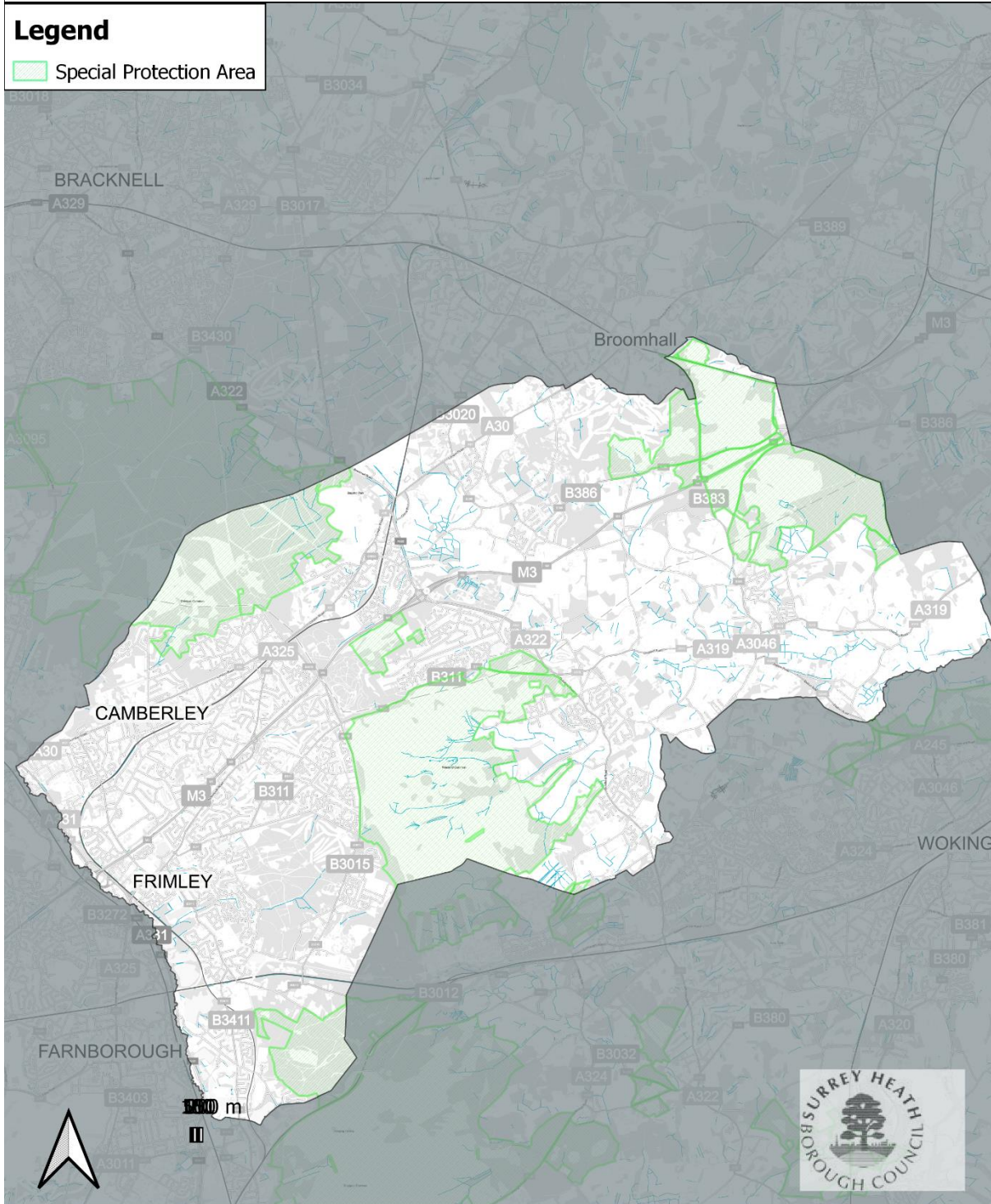


Map 10.

Policy E1 Thames Basin Heaths Special Protection Area and Policy E2 Biodiversity and Geodiversity
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 Special Protection Area



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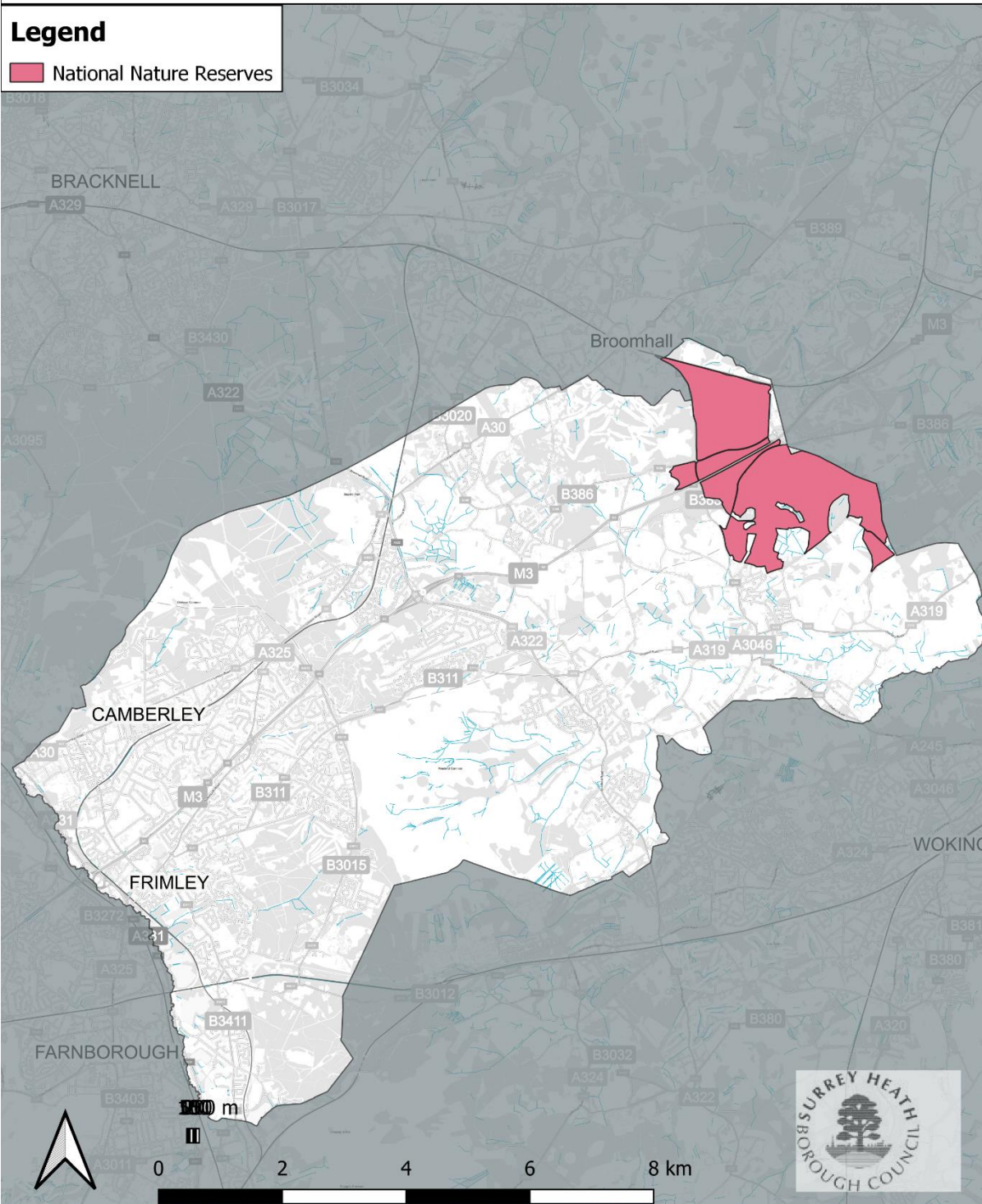
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Map 11.

Policy E2 Biodiversity and Geodiversity

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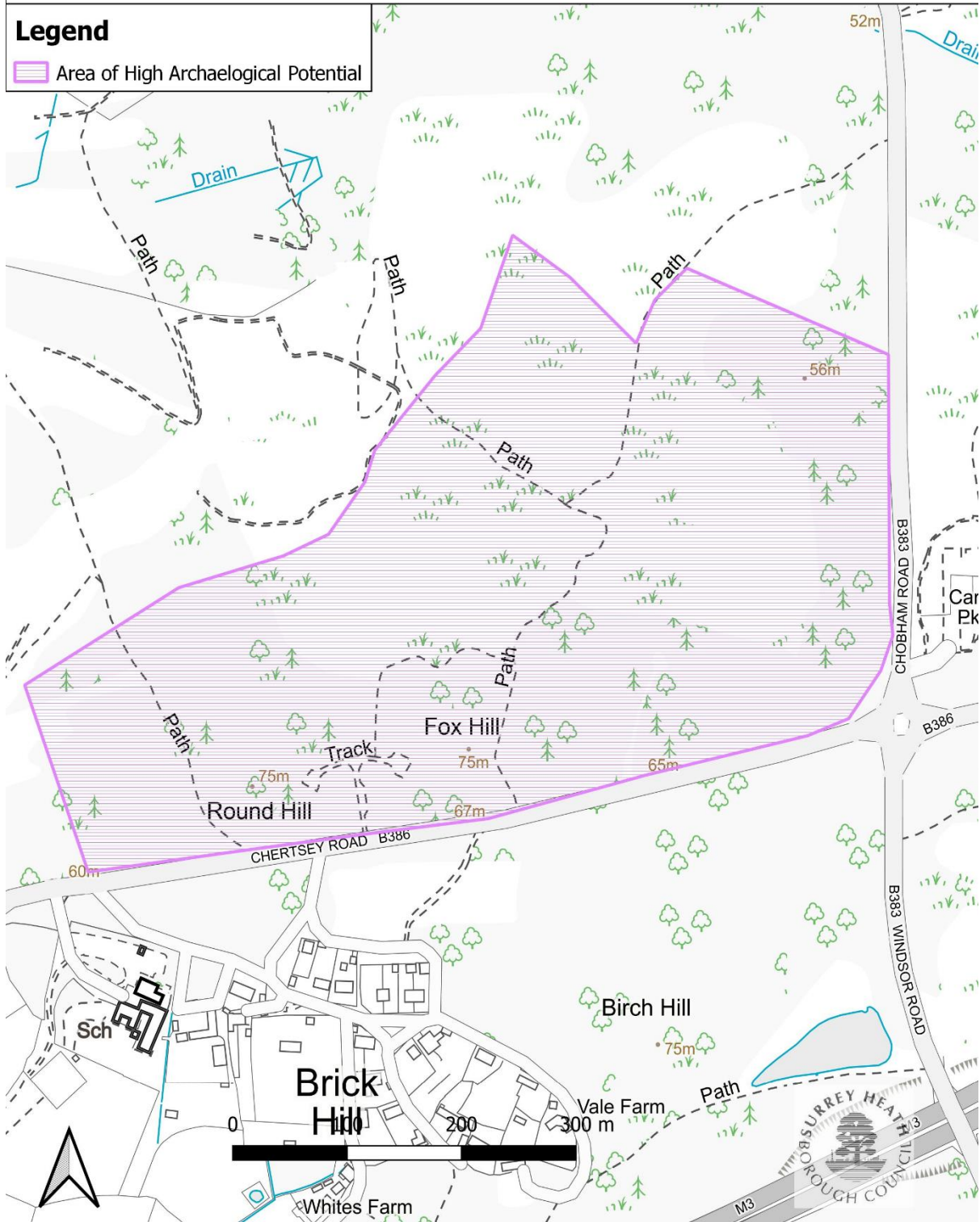
Map 12.

WWII Prisoner of War camp, Brick Hill, Chobham Common, AHAP, Policy DH7

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 Area of High Archaeological Potential



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Map 13.

Romano-British finds, Whitwells Farm, Frimley Green AHAP, Policy DH7

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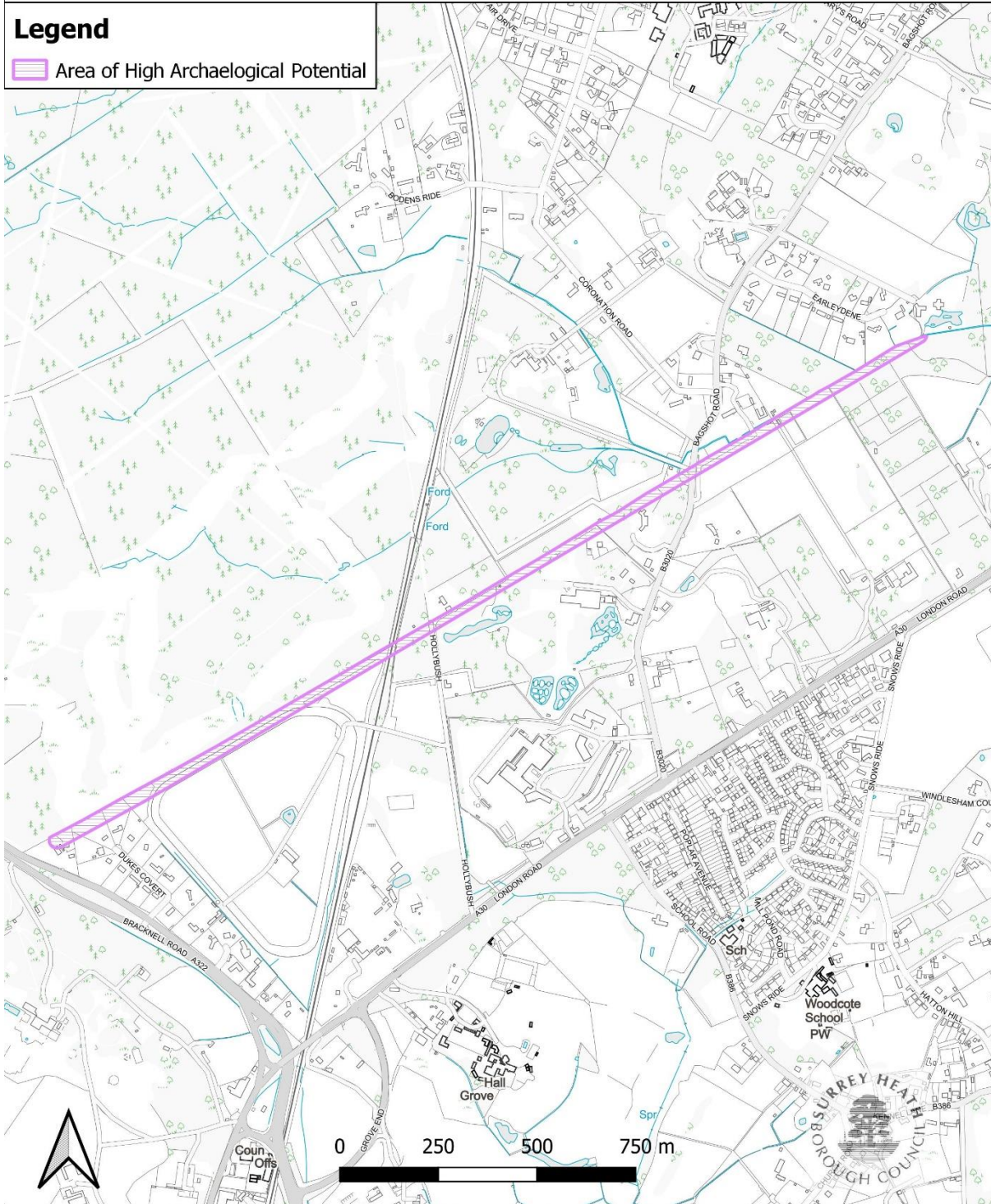


Map 14.

Roman Road, The Devils Highway, Windlesham AHAP, Policy DH7 Not to Standard Scale

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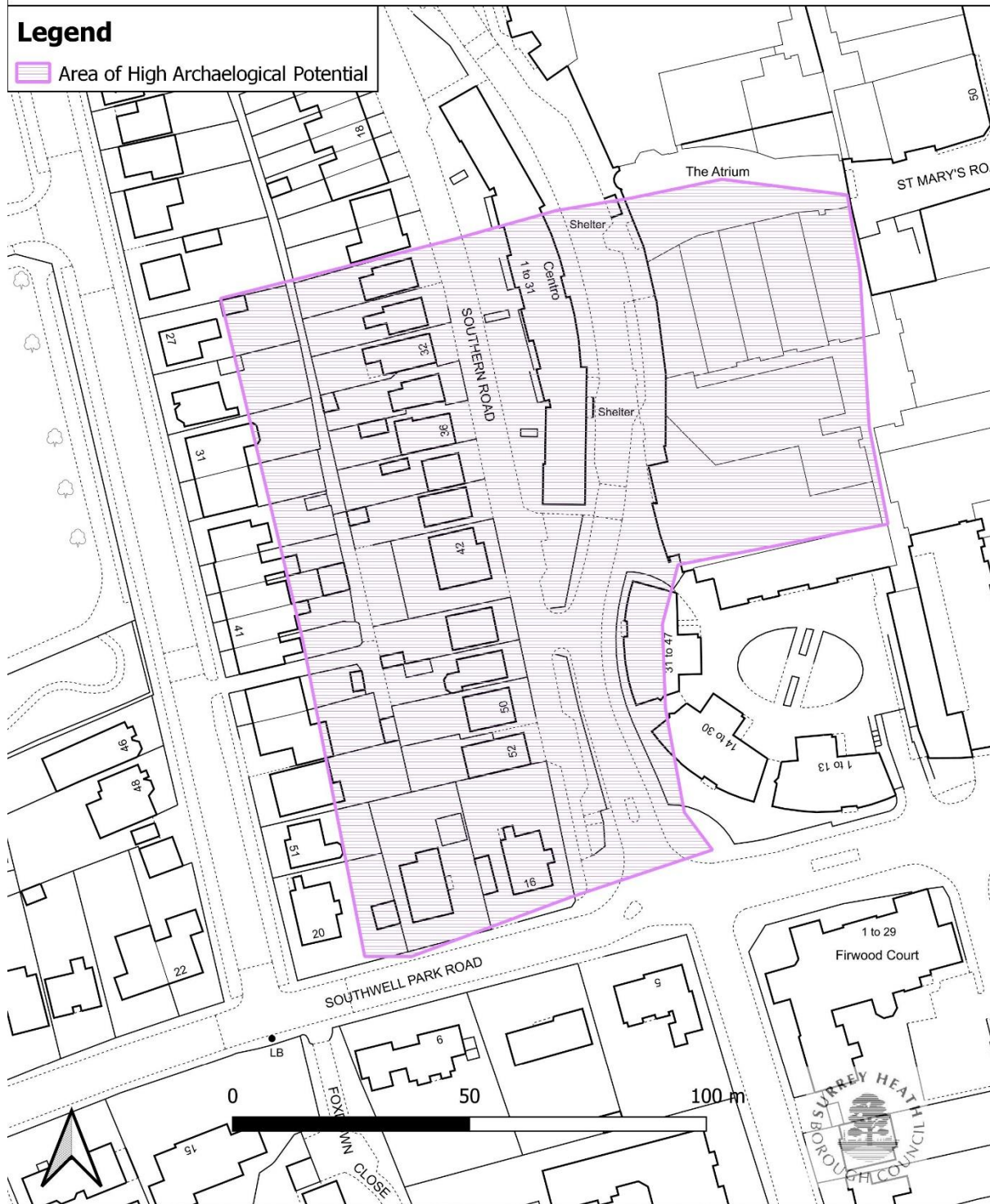
Map 15.

Organic environmental sequence, Park Street, Camberley AHAP, Policy DH7

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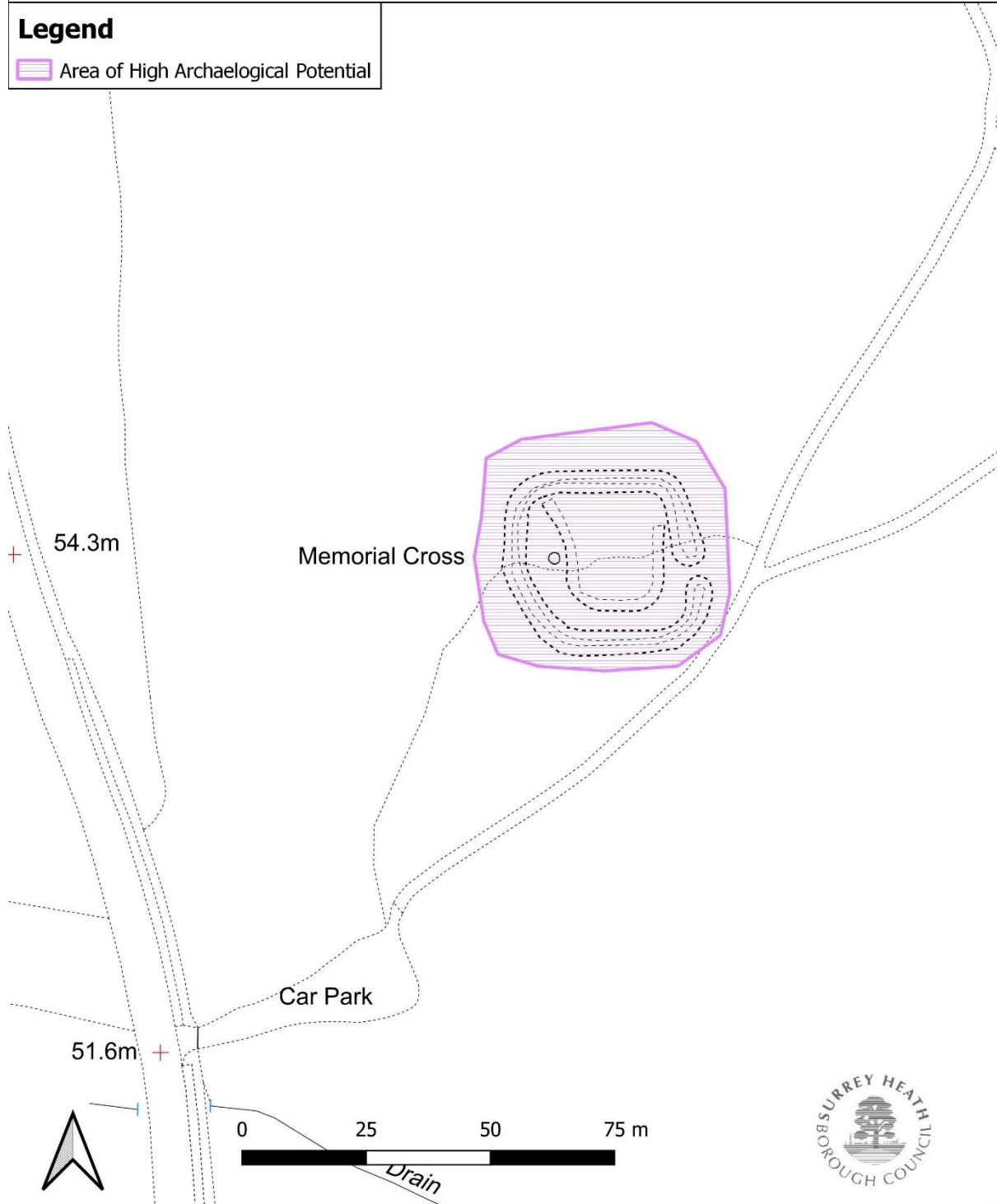
Map 16.

Military Earthworks, Ship Hill, Chobham Common, AHAP, Policy DH7

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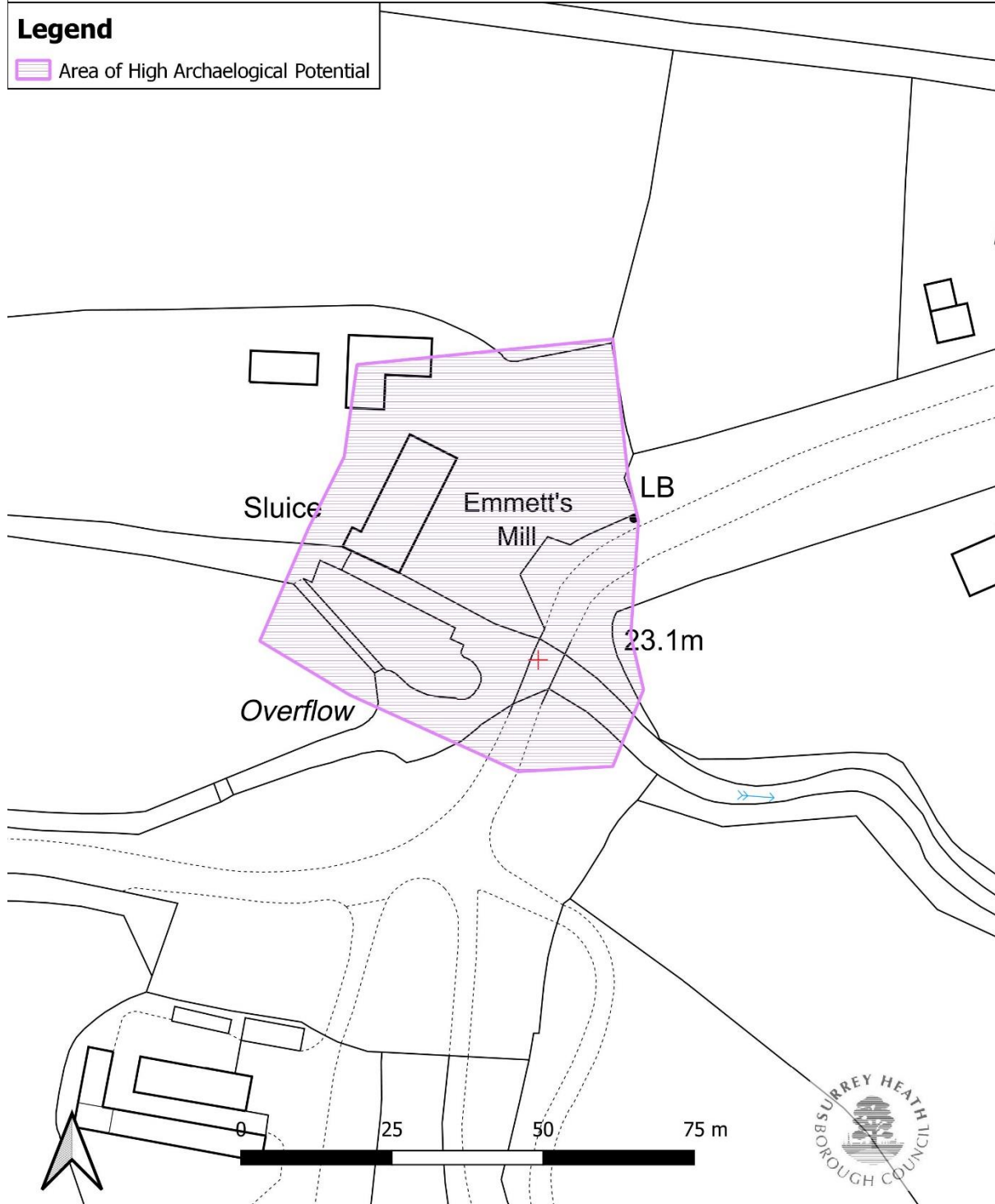
Map 17.

Medieval Watermill, Emmett's Mill, Philpot Lane, Chobham AHAP, Policy DH7

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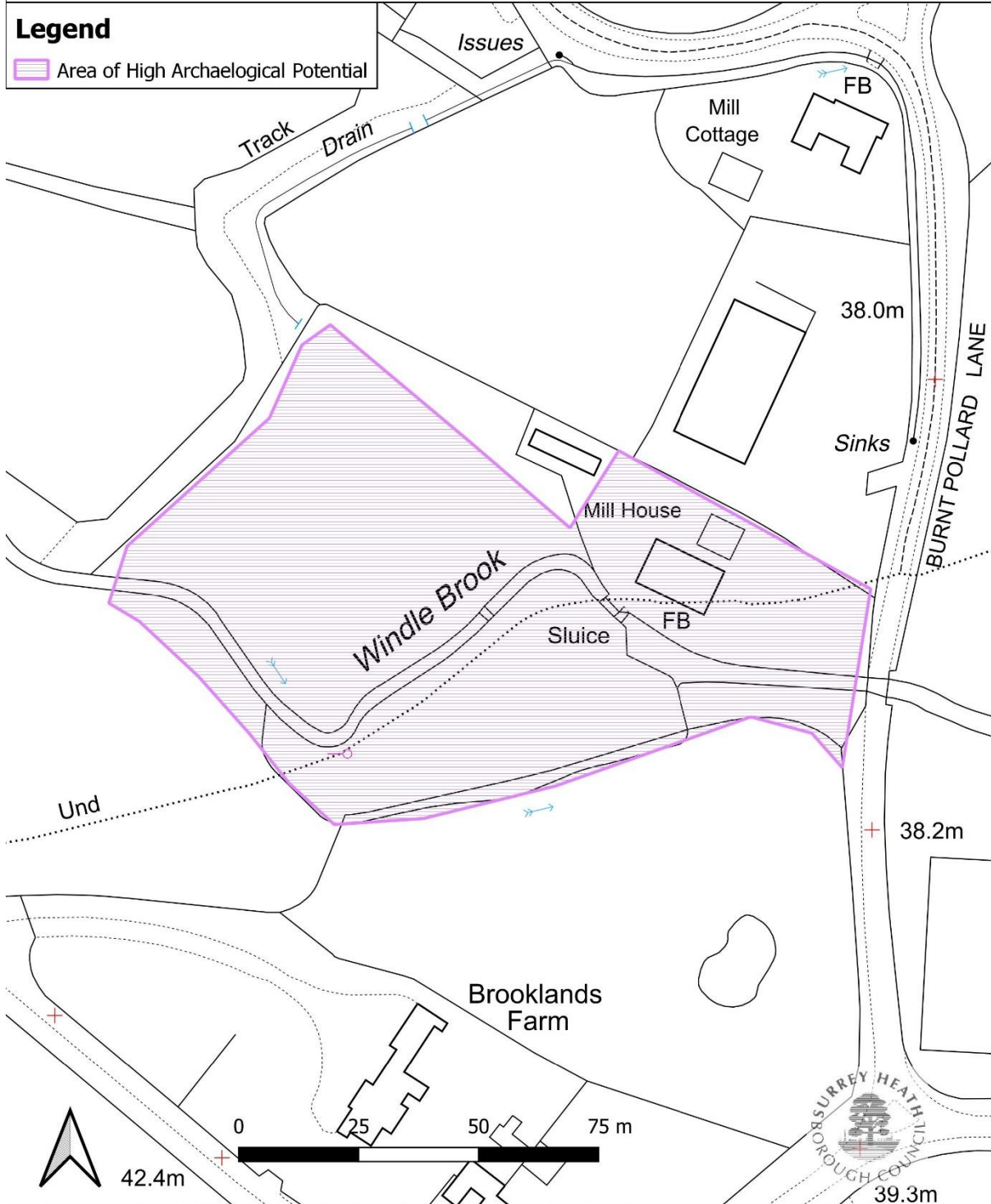
Map 18.

Medieval Watermill, Hook Mill, West End, AHAP, Policy DH7

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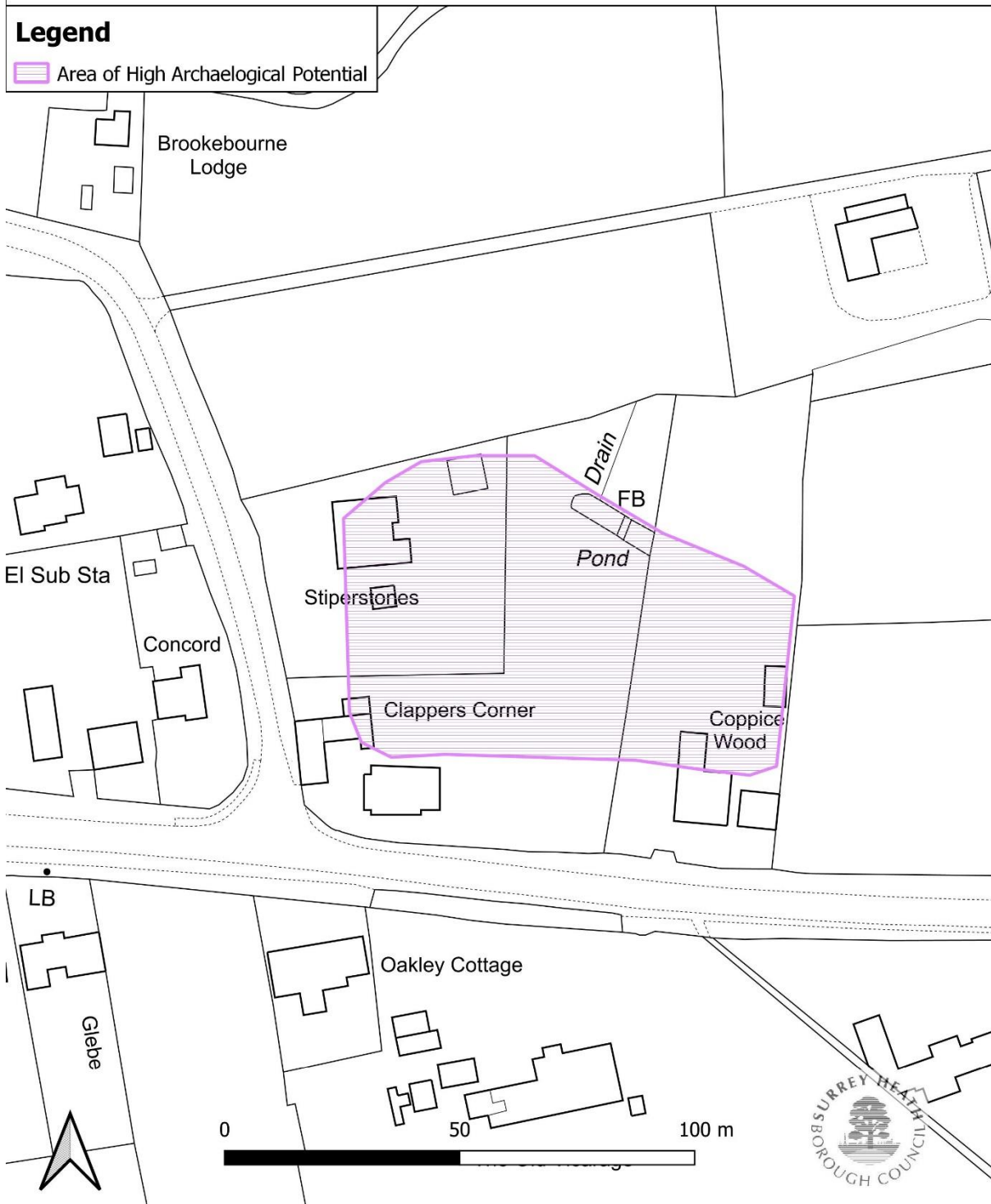
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Map 19.

Probable medieval moated site, corner of Clappers Lane and Bagshot Road, Chobham AHA Policy DH7

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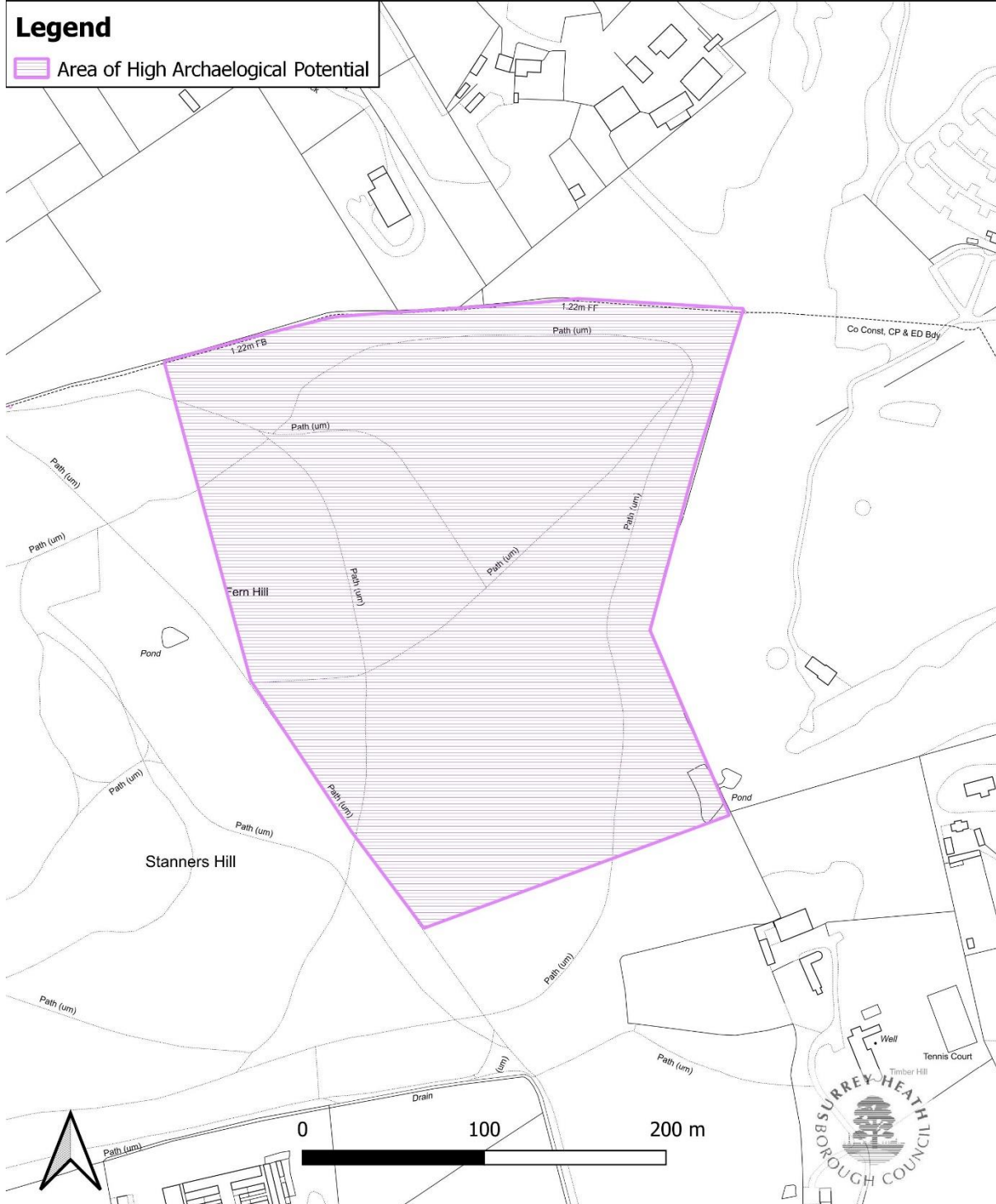


Map 20.

Late Roman findspots, west of Queenswood Farm Golf Club, Chobham AHAP, Policy DH7
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 Area of High Archaeological Potential



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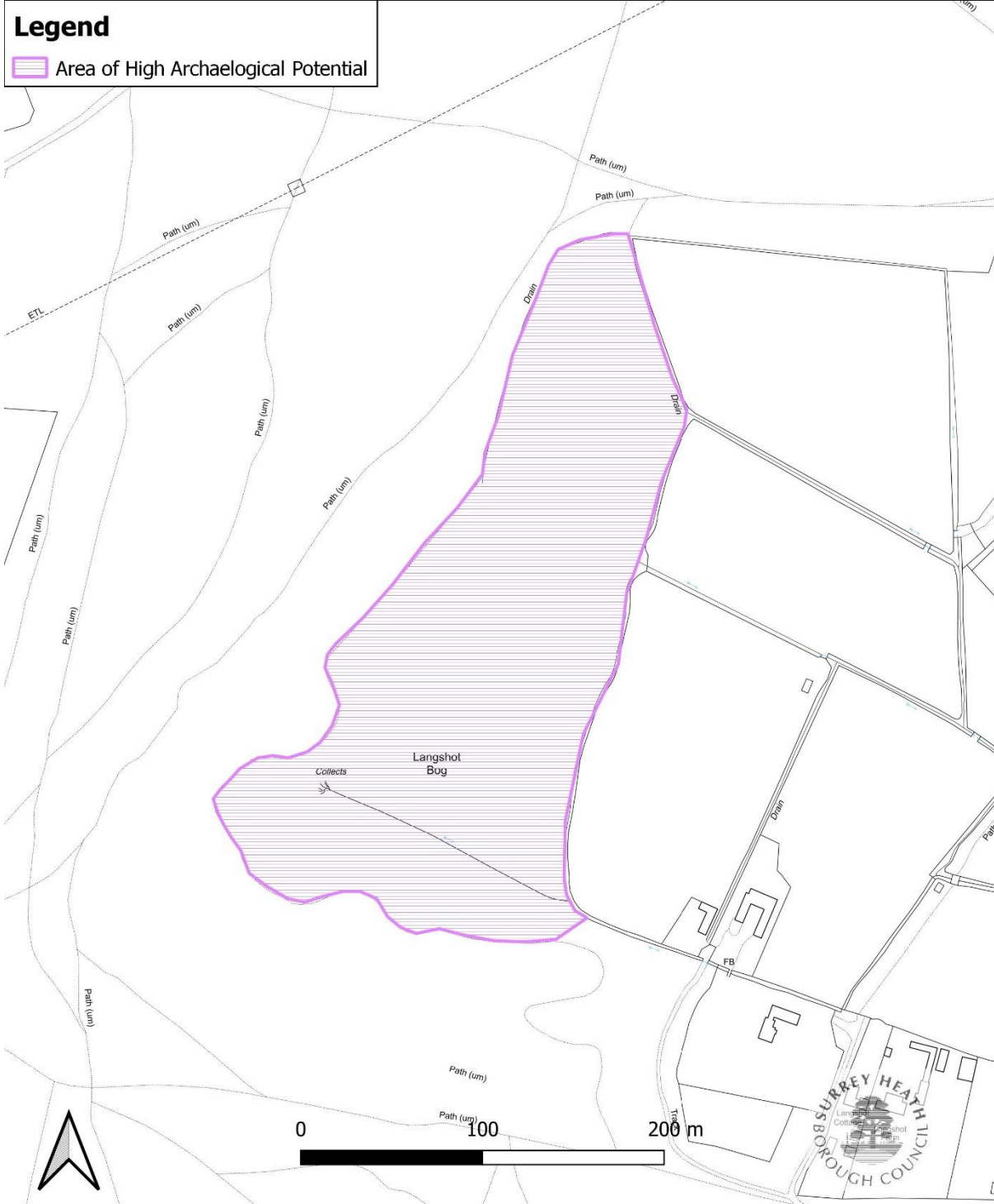


Map 21.

**Prehistoric environmental sequence, Langshott Bog, Chobham Common AHAP, Policy DH7
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 Area of High Archaeological Potential



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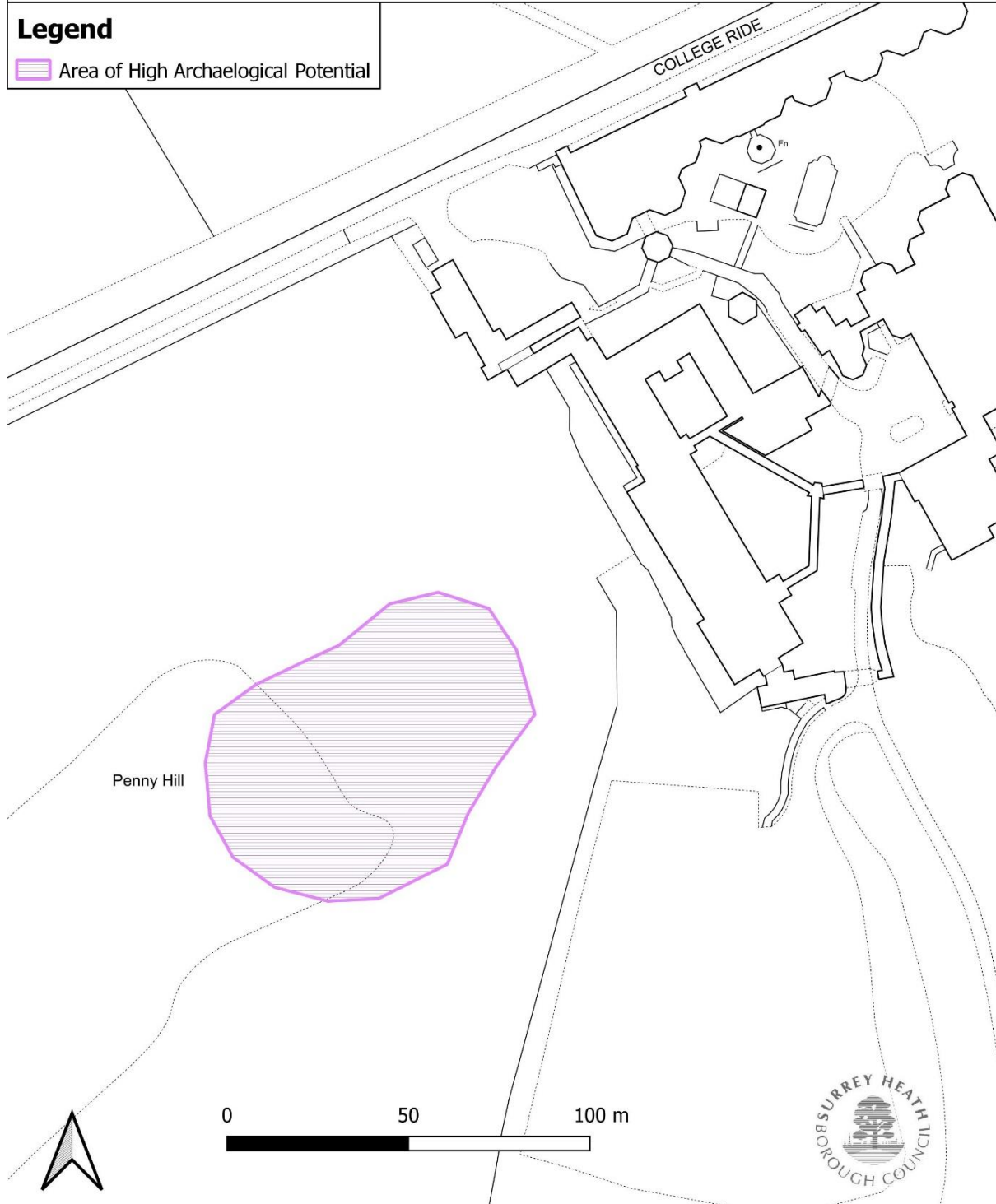
Map 22.

Enclosure of possible Roman date, Penny Hill, Bagshot, AHAP, Policy DH7

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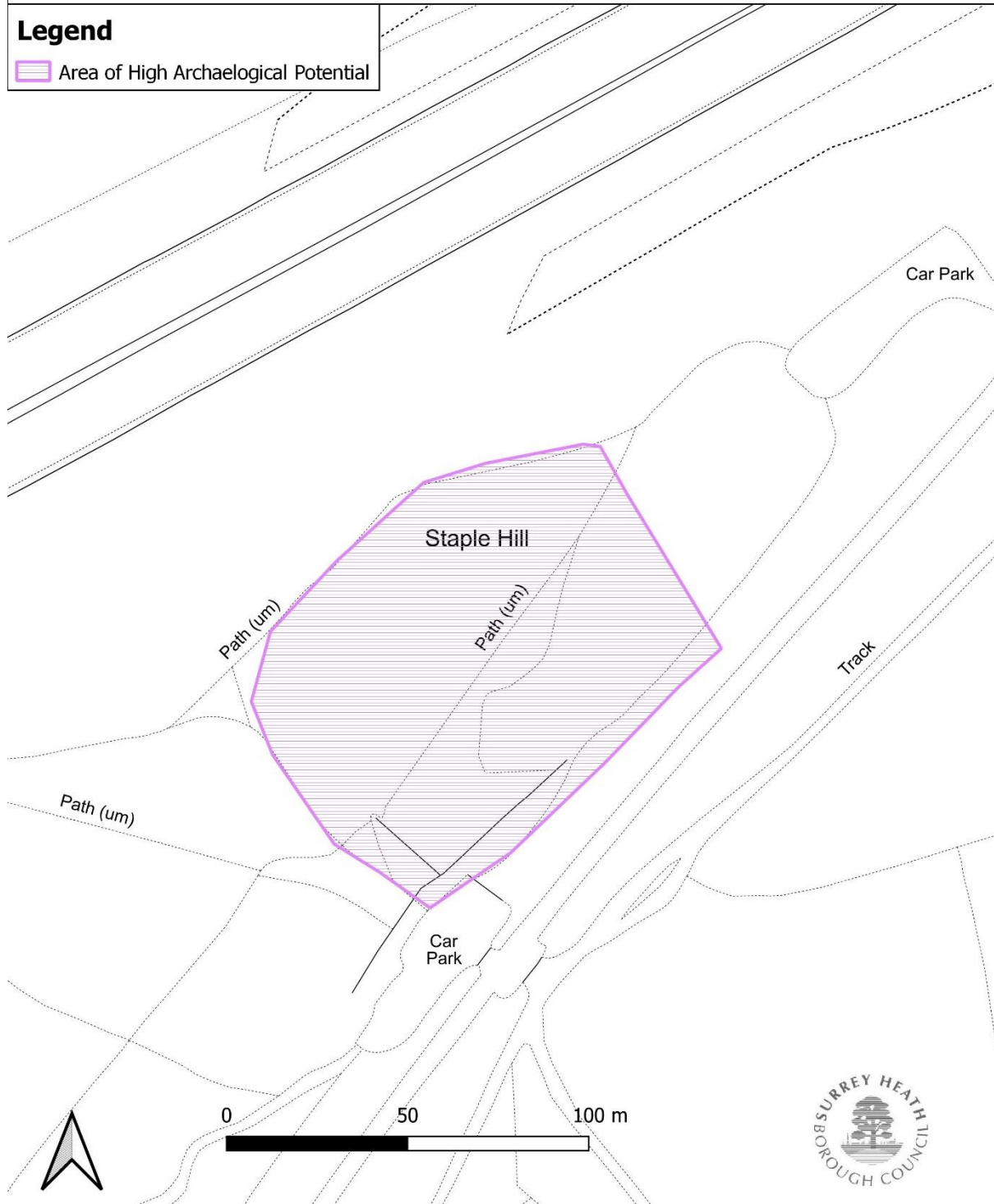
Map 23.

19thC Military Earthwork, Staples Hill, Chobham Common, AHAP, Policy DH7

Not to Standard Scale

Legend

 Area of High Archaeological Potential



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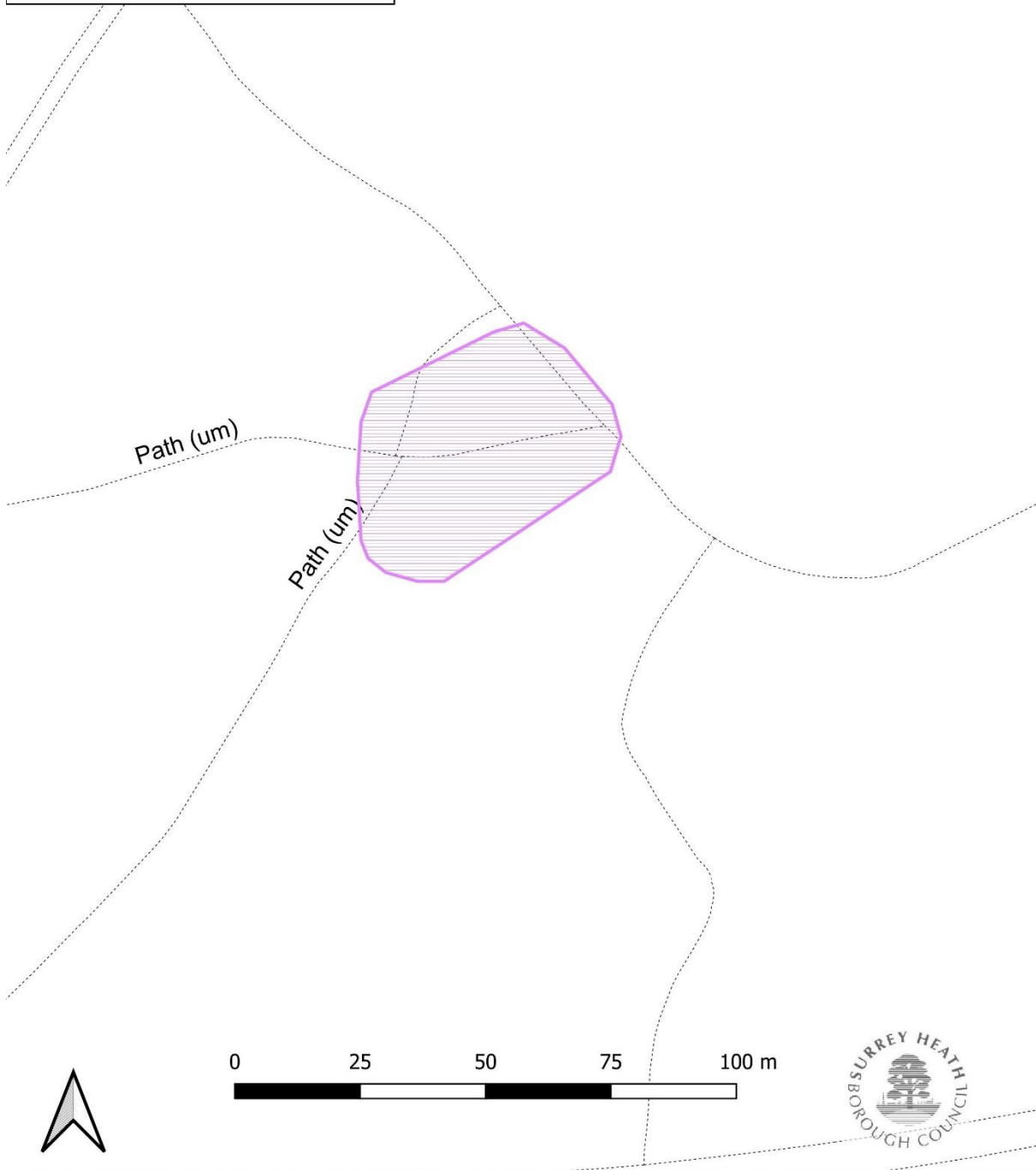
Map 24.

19th C Military Earthwork, Oystershell Hill, Chobham Common, AHAP, Policy DH7

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Legend

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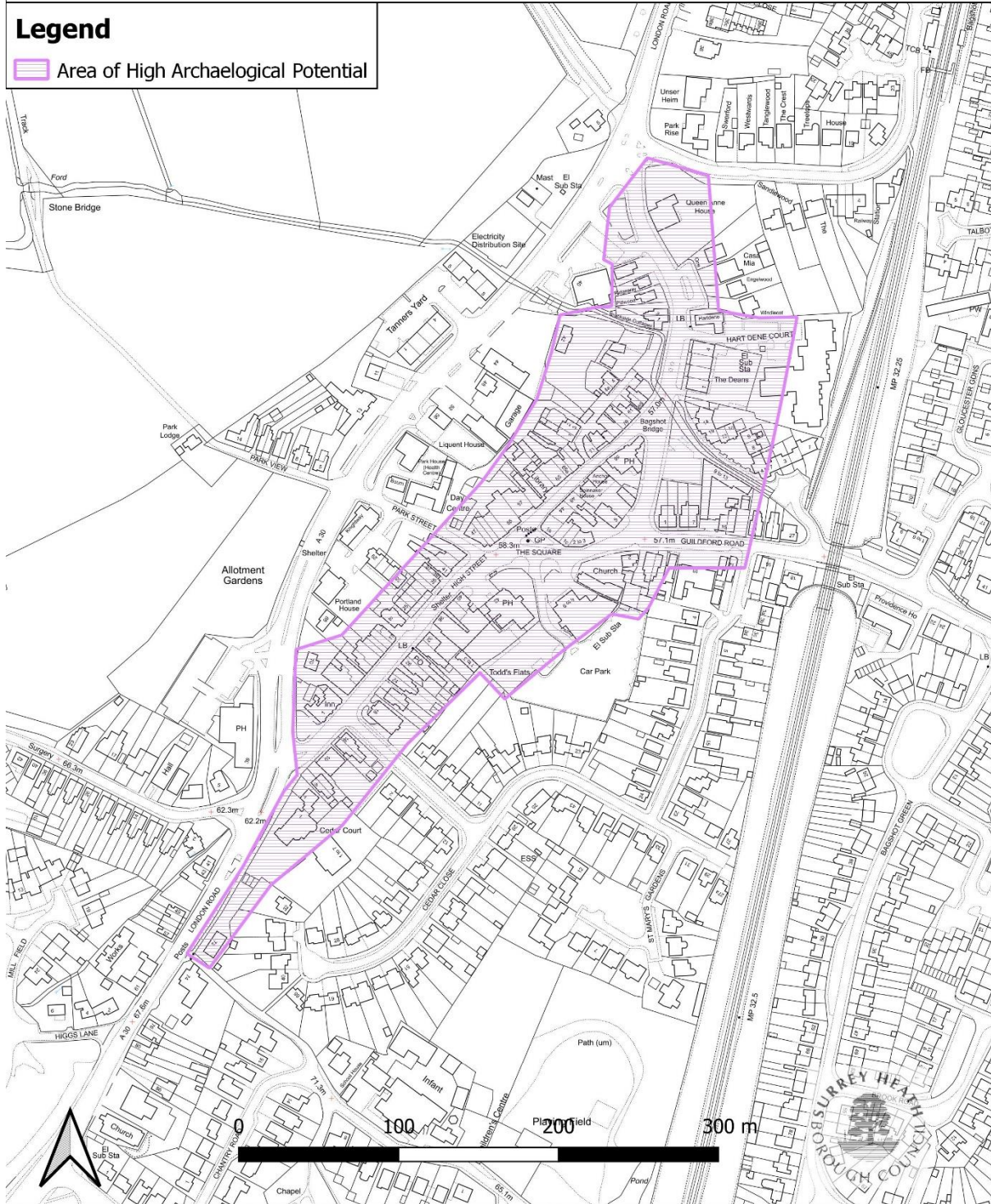
Map 25.

Bagshot Historic Town Core, AHAP, Policy DH7

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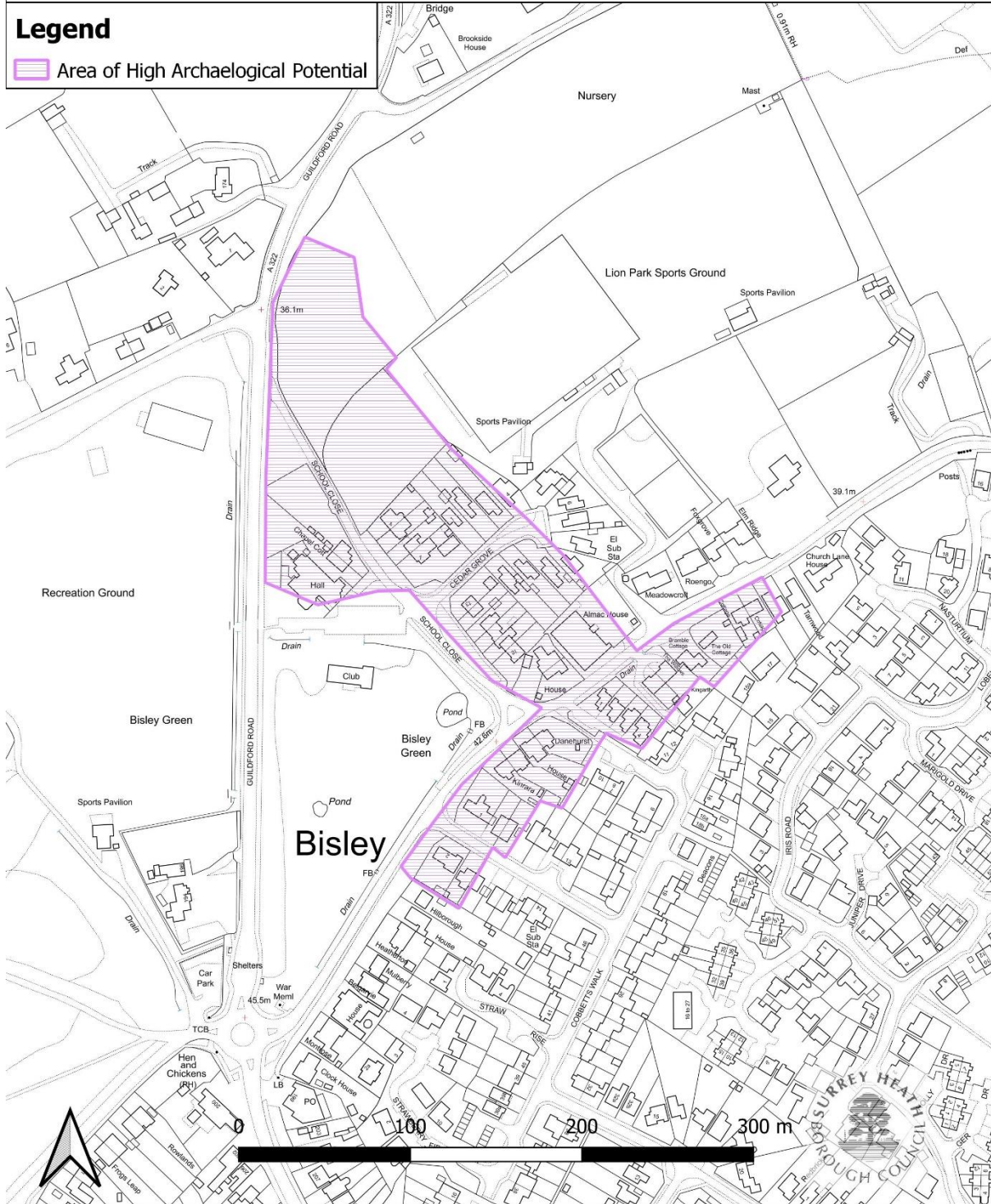
Map 26.

Bisley Historic Town Core, AHAP, Policy DH7

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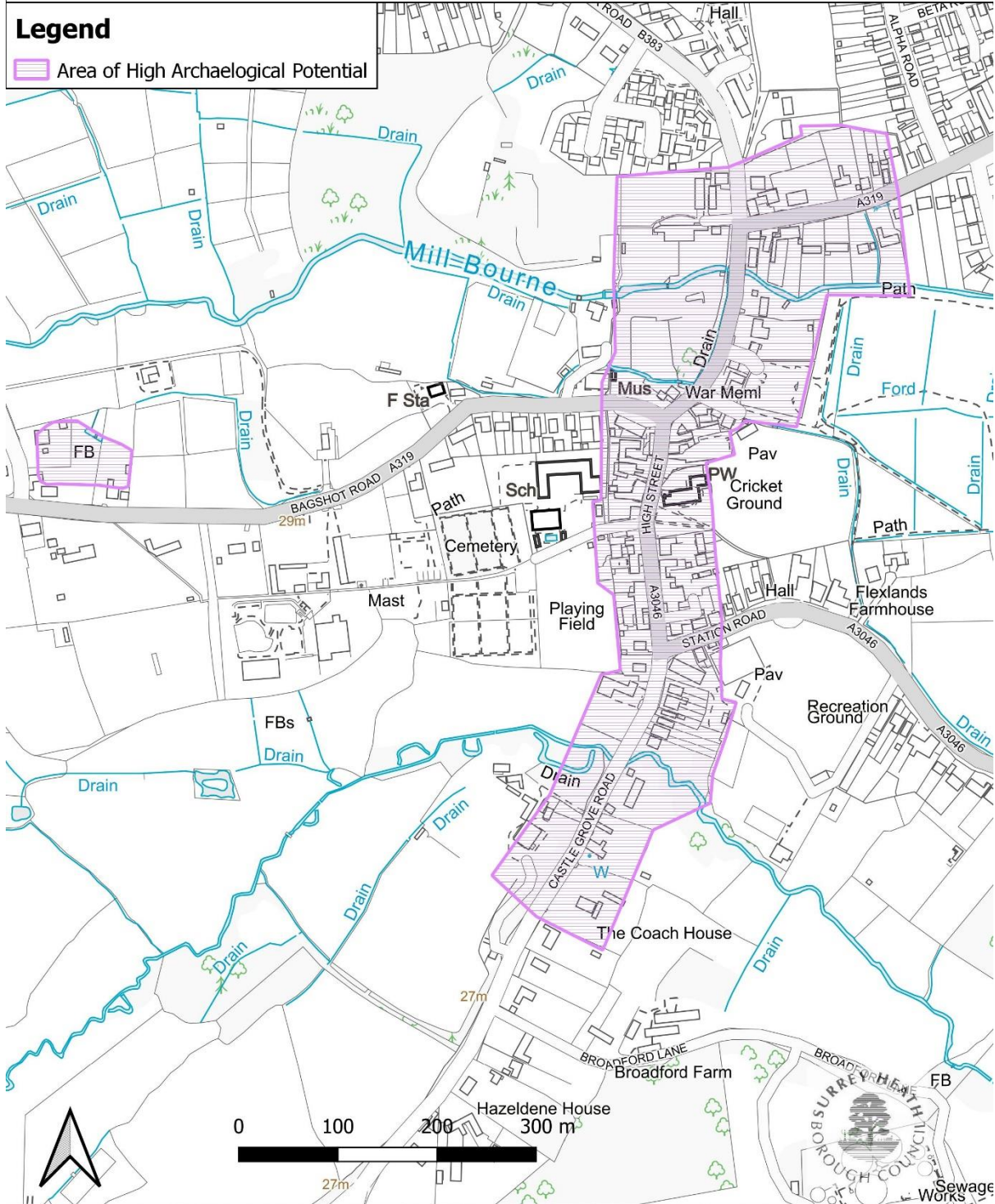
Map 27.

Chobham Historic Town Core and 11th Century Church of St Lawrence, Policy DH7

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Legend

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Map 28.



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Map 29.

St Johns Baptist Church, Bisley AHAP, Policy DH7

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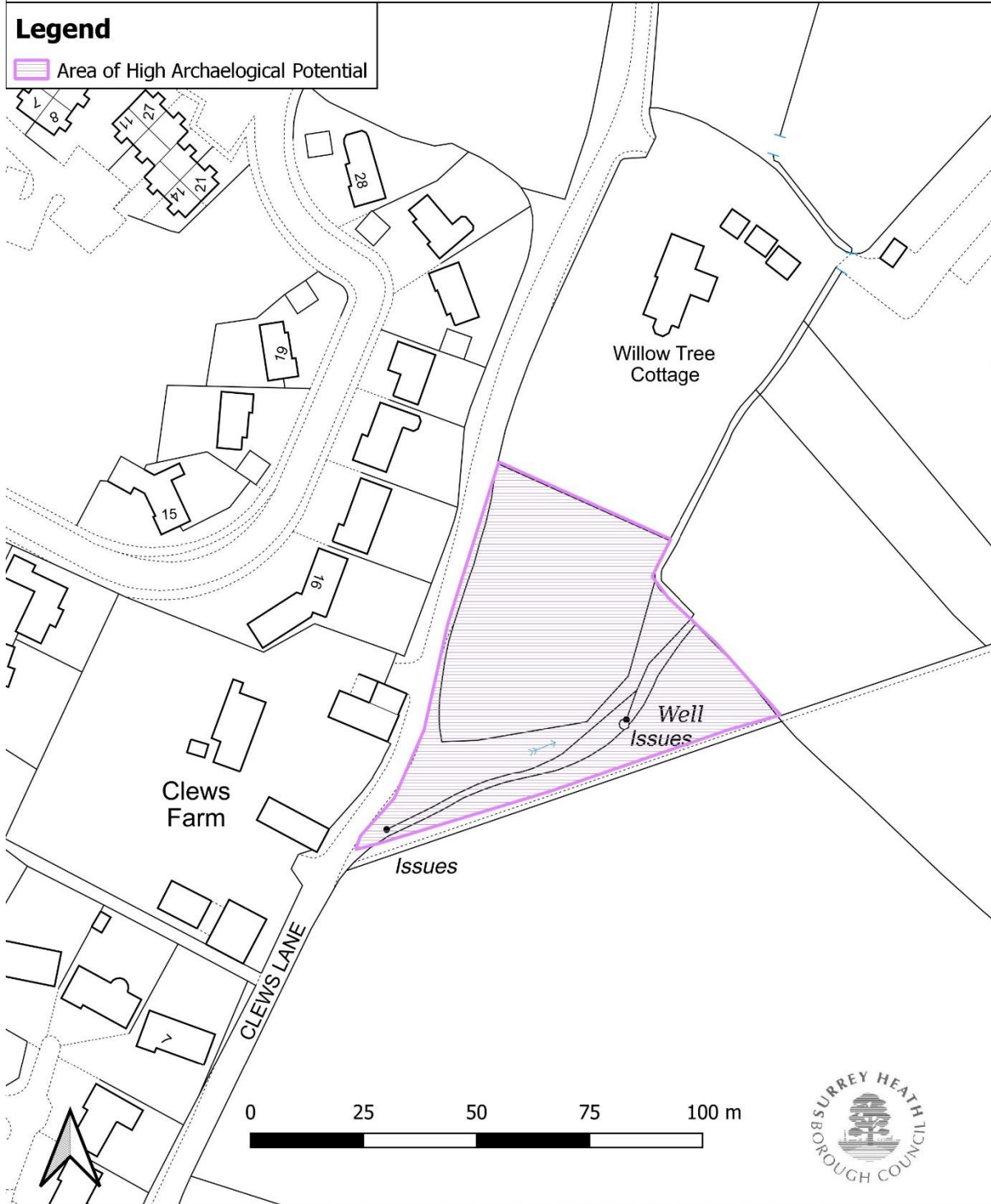
Map 30.

St Johns Baptist Well, Bisley AHAP, Policy DH7

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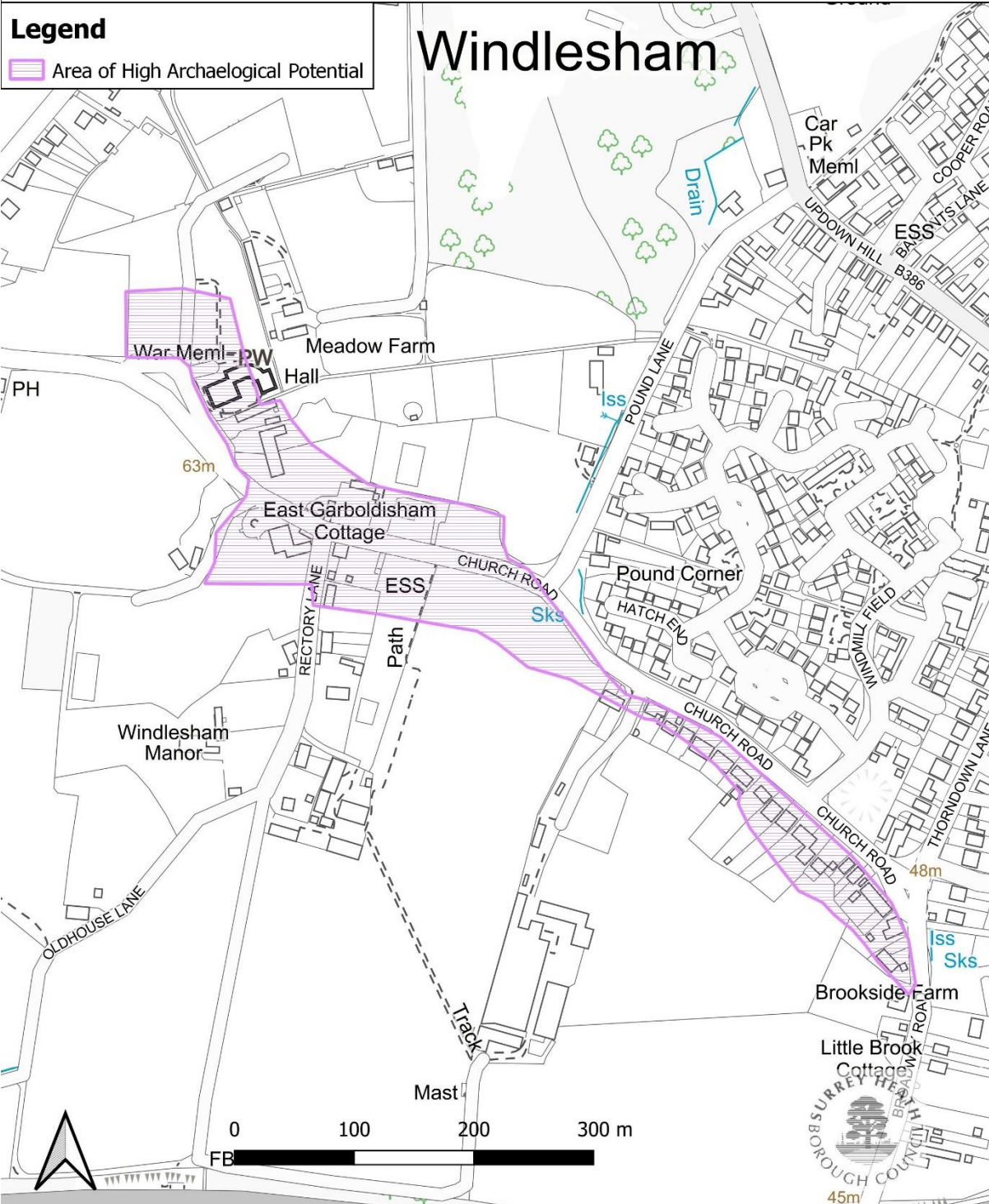
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Map 31.

Windlesham Historic Town Core, AHAP, Policy DH7

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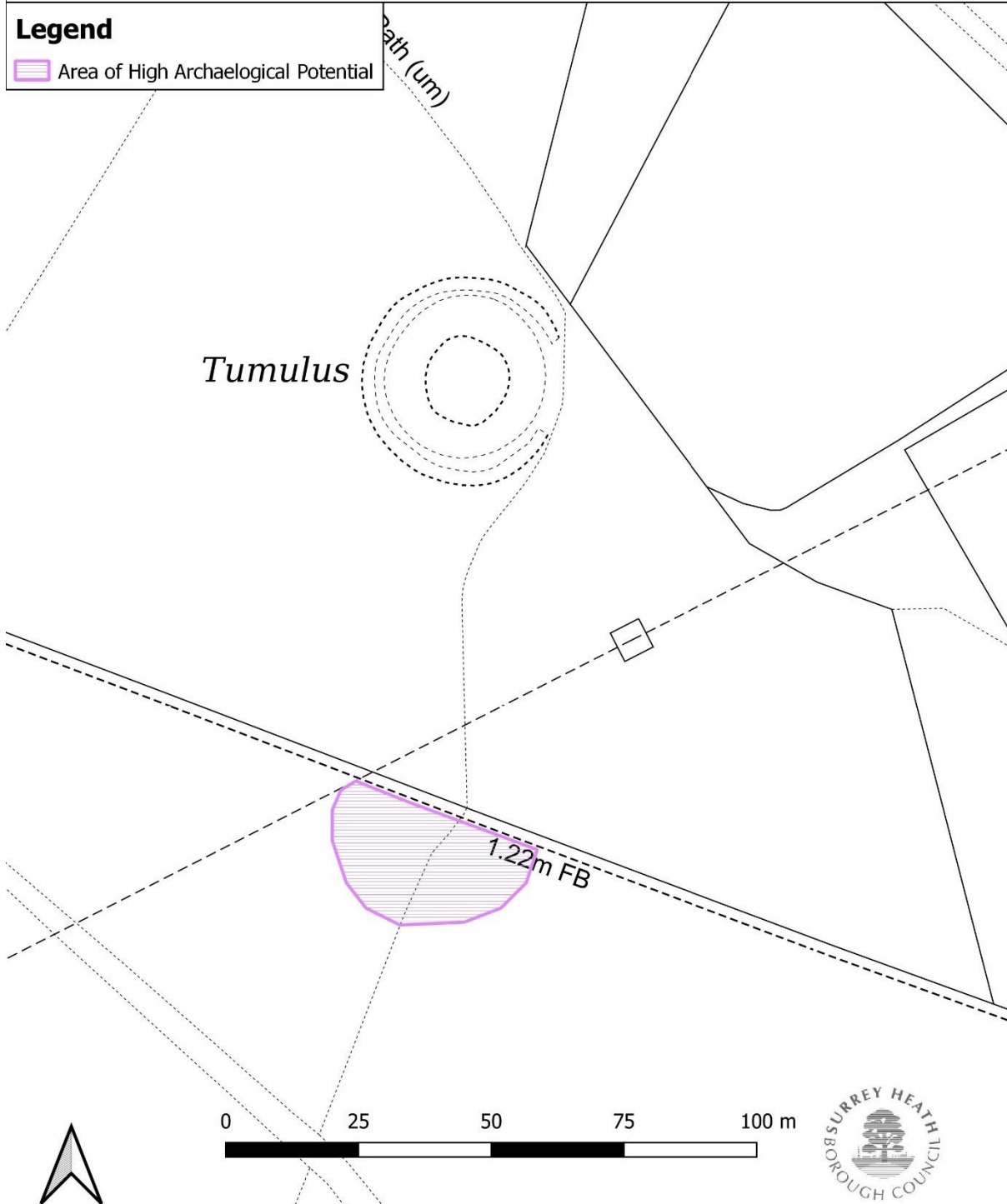
Map 32.

Possible barrow, west Pipers Green Farm, Chobham Common AHAP, Policy DH7

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Legend

 Area of High Archaeological Potential



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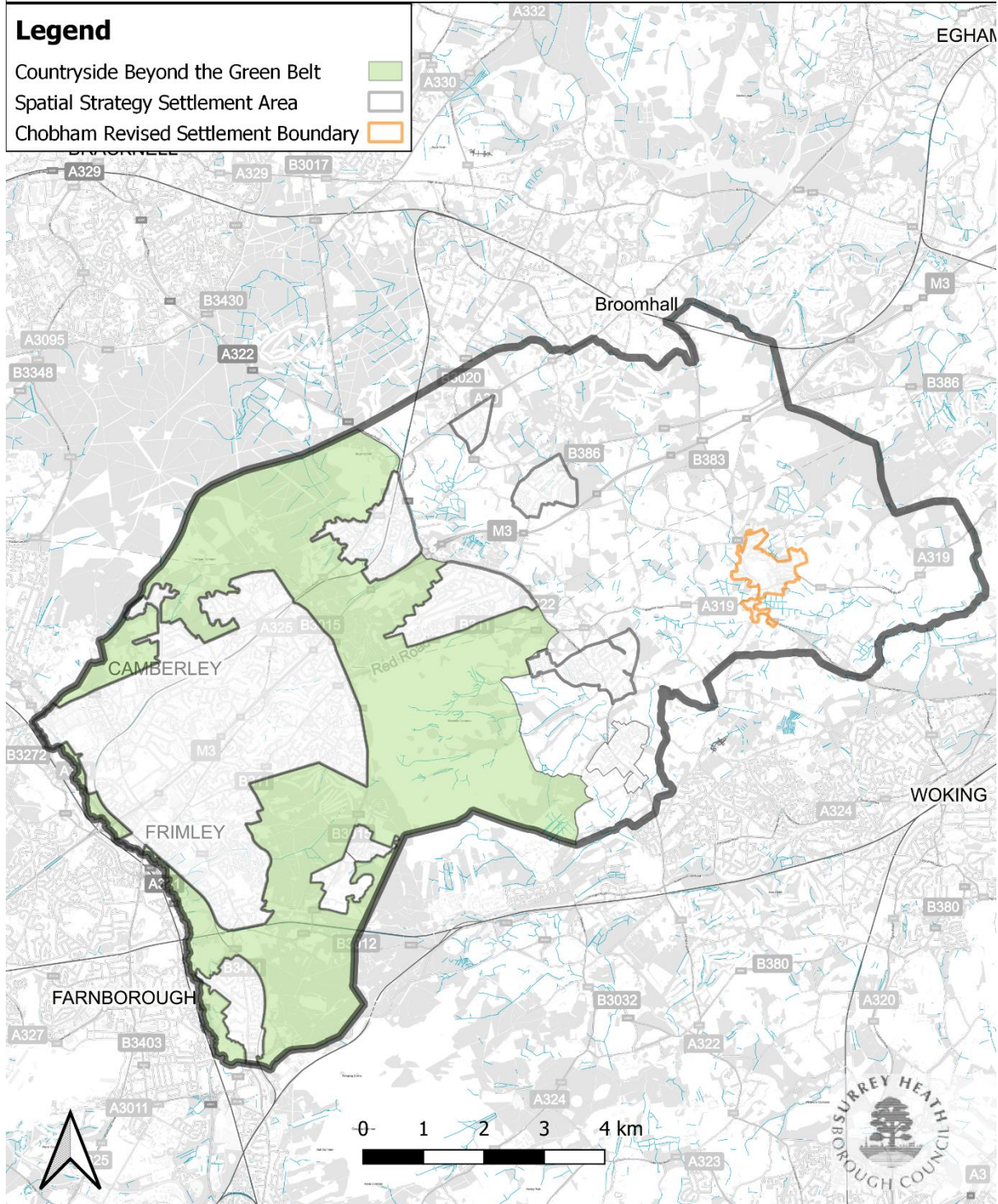
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Map 33.

Policy SS1 Spatial Strategy and Policy GBC4 Development within the Countryside

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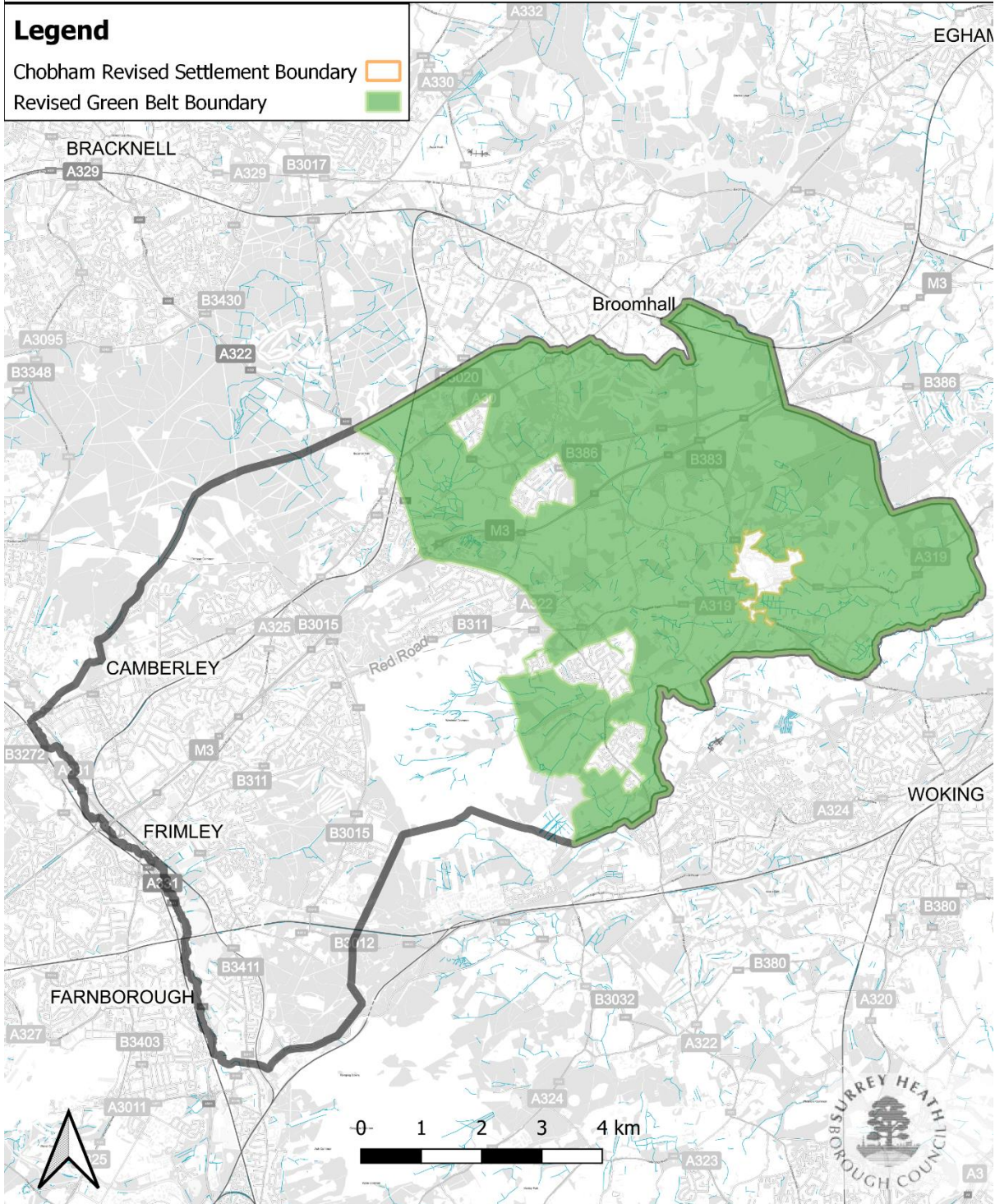
Map 34. Revised Green Belt boundary

Policy SS1 Spatial Strategy

Not to Standard Scale

Legend

- Chobham Revised Settlement Boundary 
- Revised Green Belt Boundary 



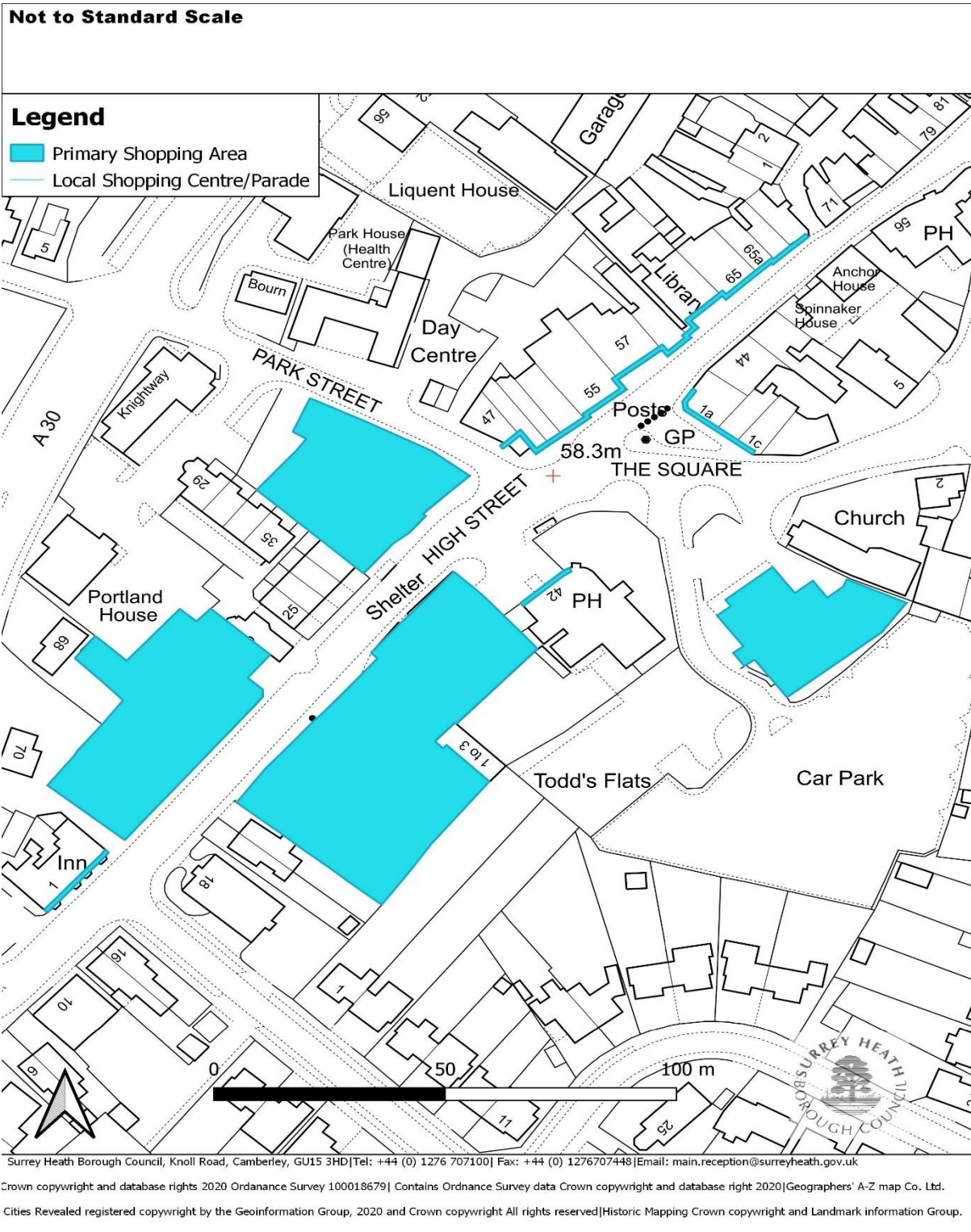
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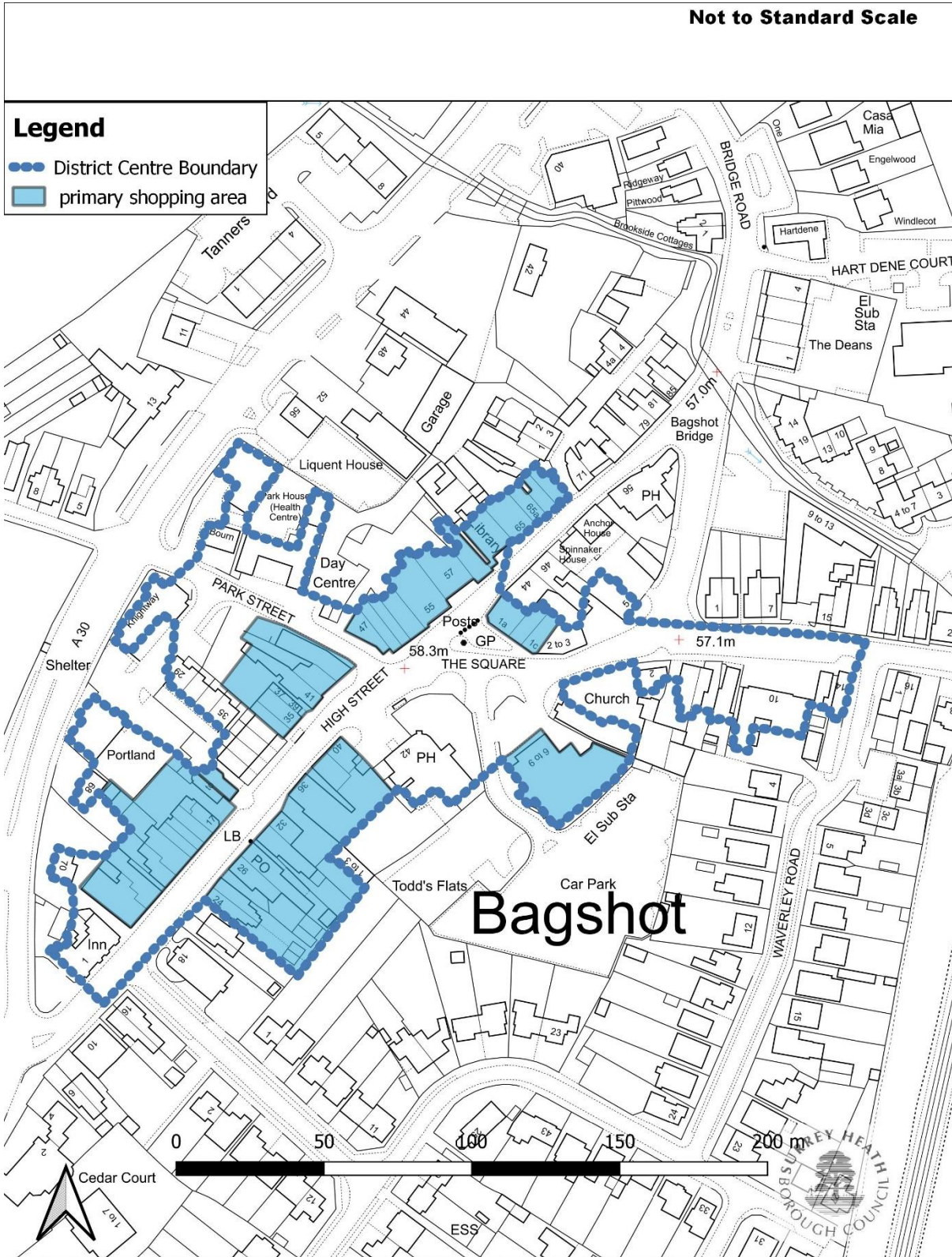
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Map 35. Bagshot District Centre (Core Strategy 2012CP9/DM12) -Delete



Map 36. Bagshot District Centre (Amended Policy ER9)



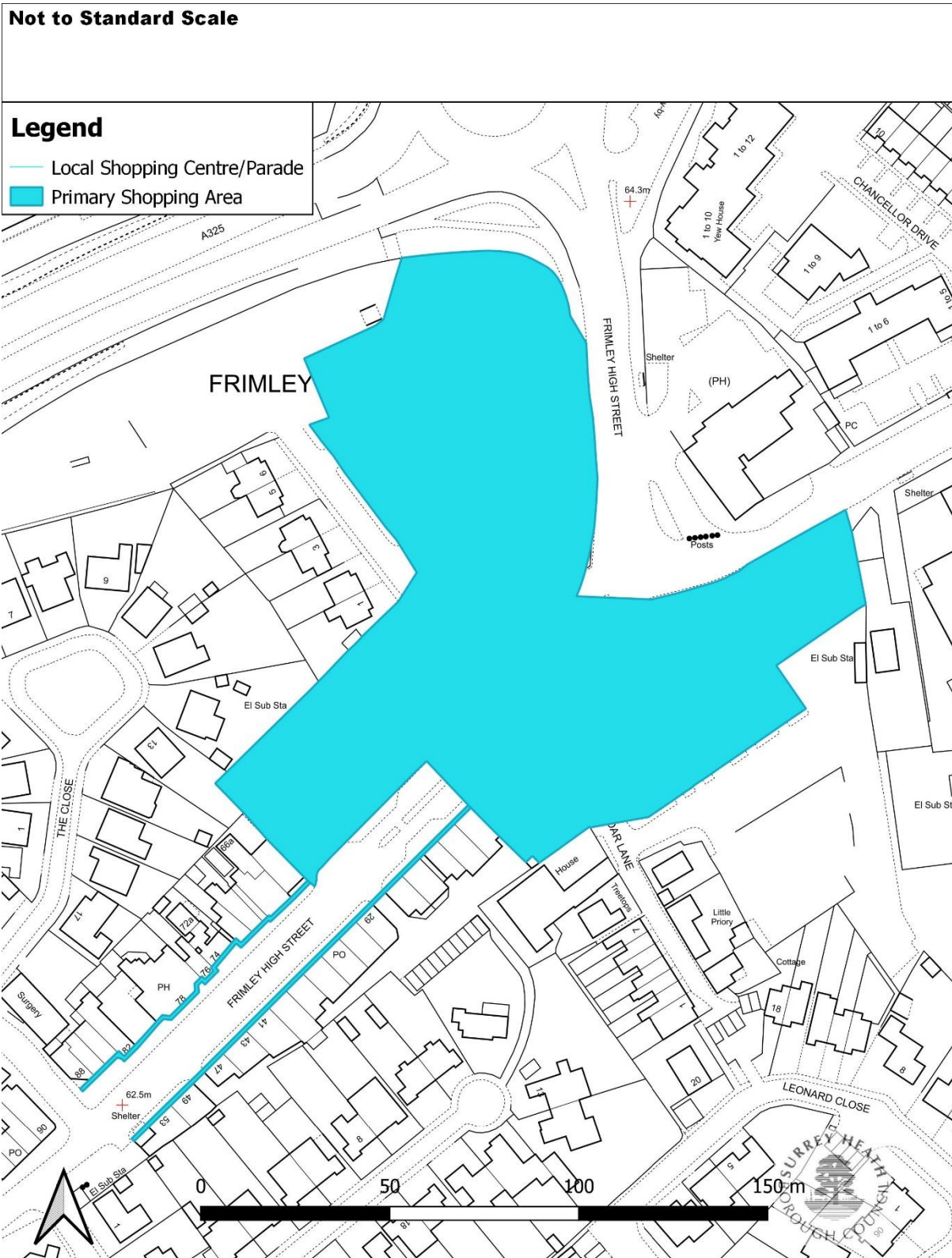
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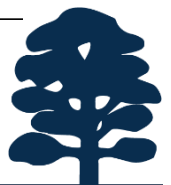
Map 37. Frimley District Centre (Core Strategy 2012, CP9/DMI2) - Delete



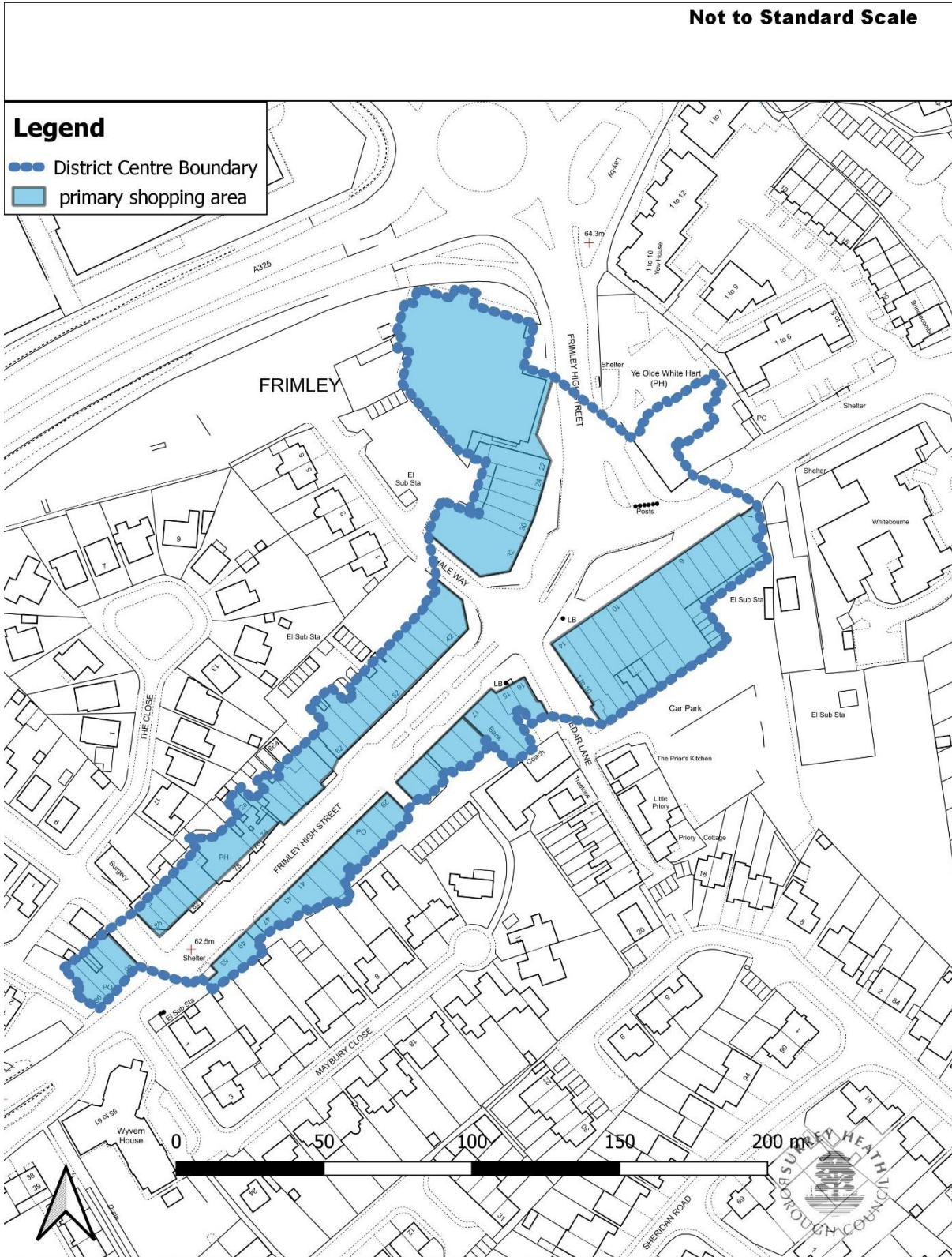
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Map 38. Frimley District Centre (Amended Policy ER9)



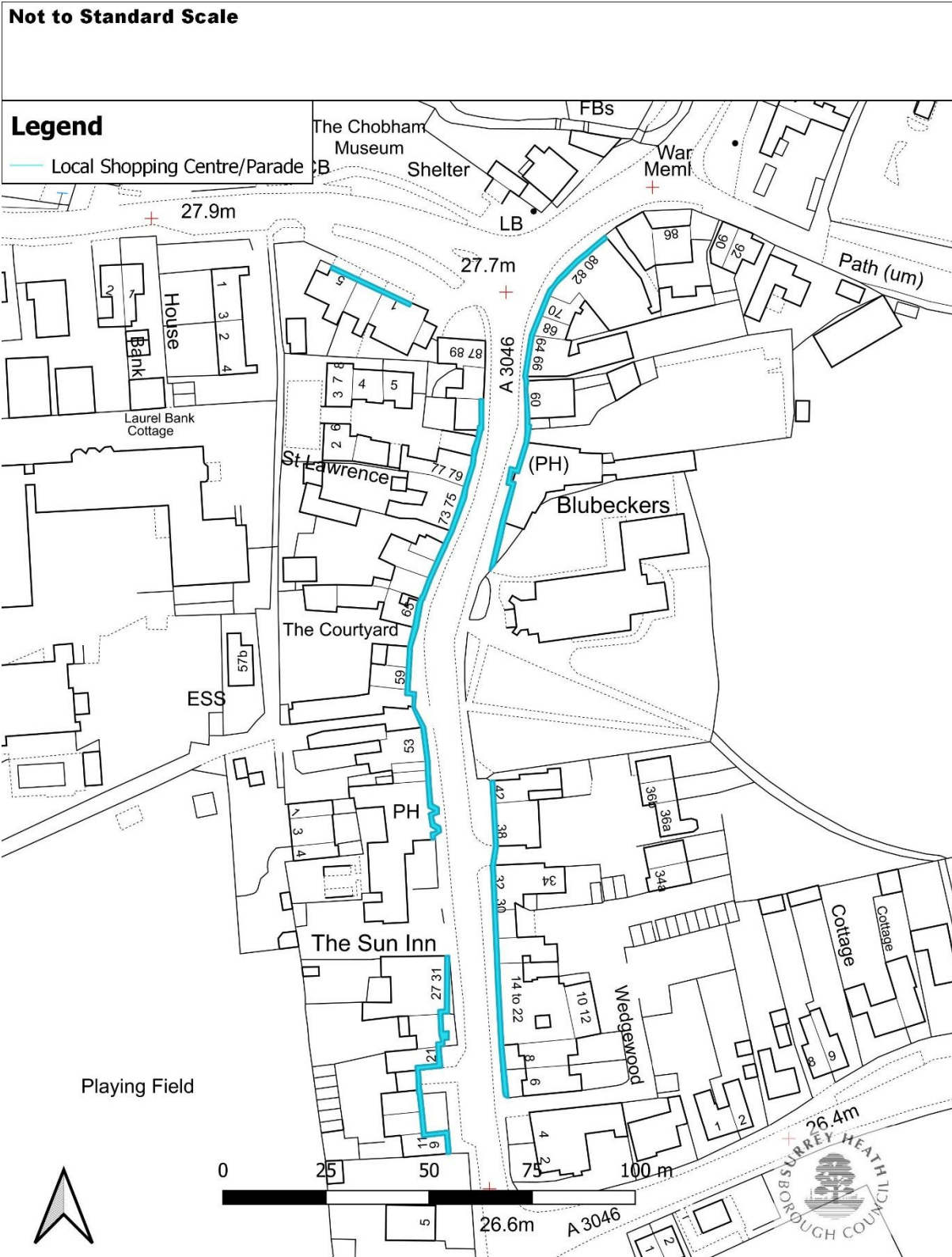
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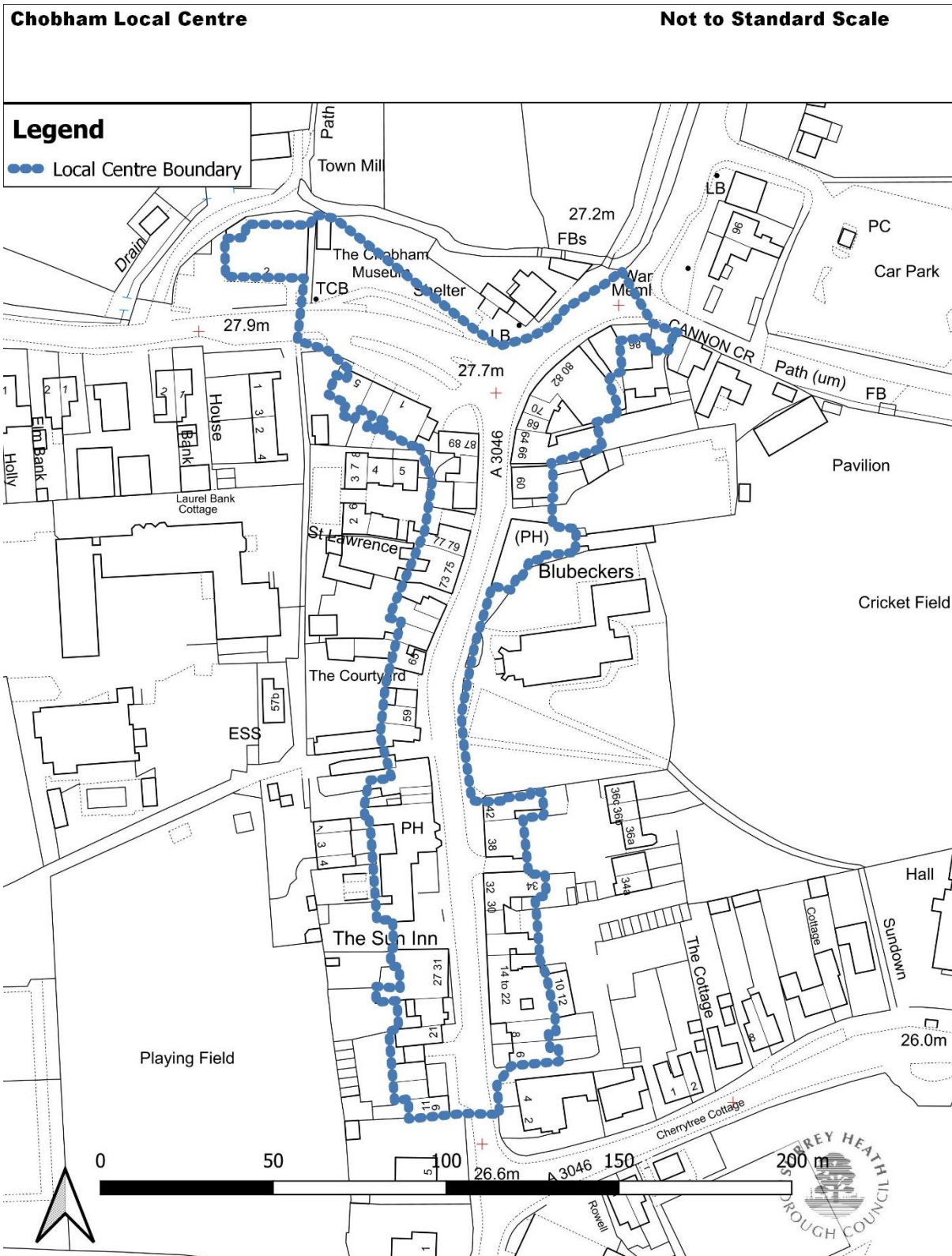
Map 39. Chobham Local Centre (Core Strategy 2012, CP9/DMI2) - Delete



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Map 40. Chobham Local Centre (Amended Policy ER9)



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Map 41. Deepcut Local Centre (Core Strategy 2012, CP9/DM12) - Delete



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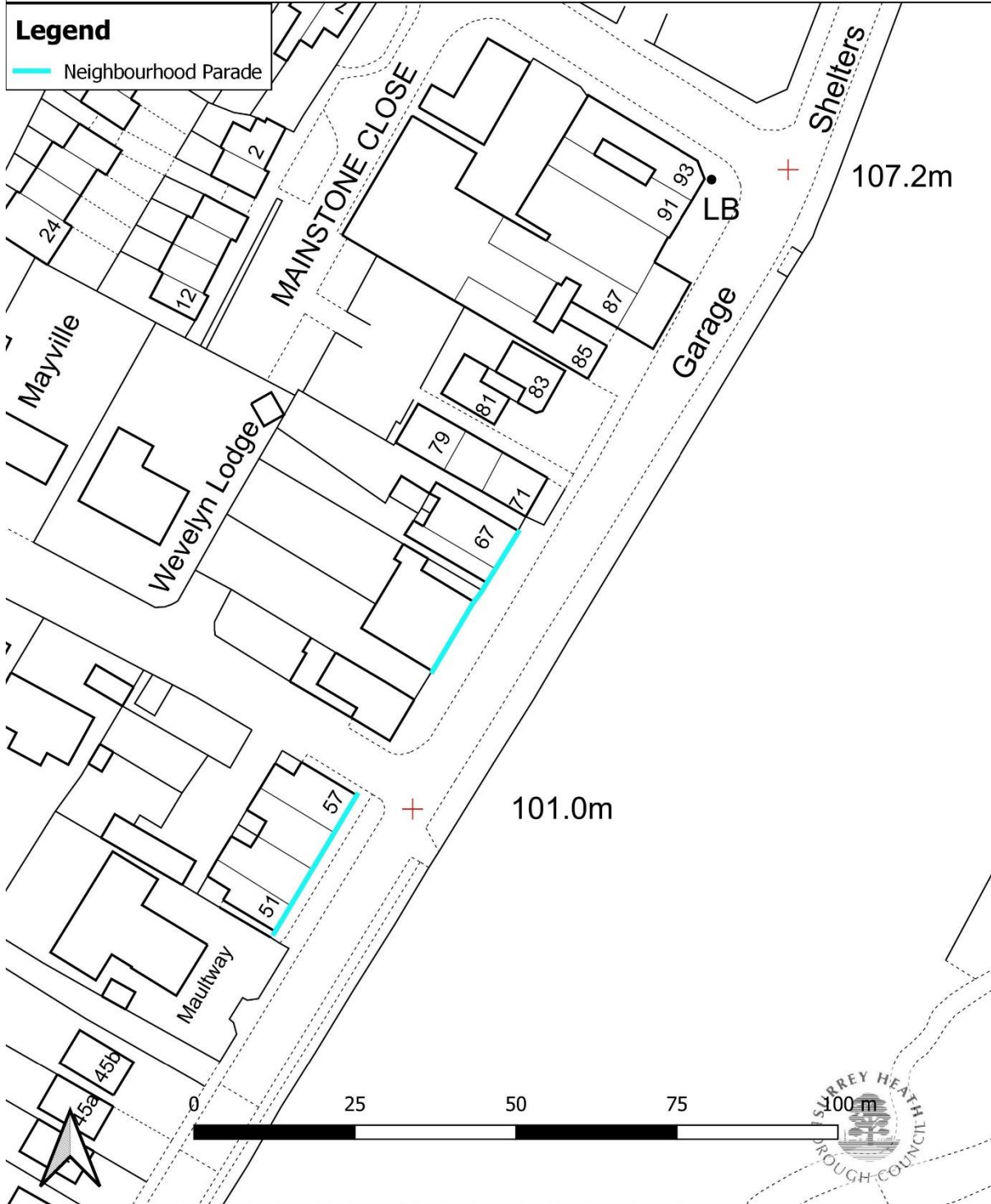


Map 42. Deepcut Neighbourhood Centre (de-designated from a Local Centre Policy)

Deepcut Neighbourhood Parade **Not to Standard Scale**

Legend

Neighbourhood Parade



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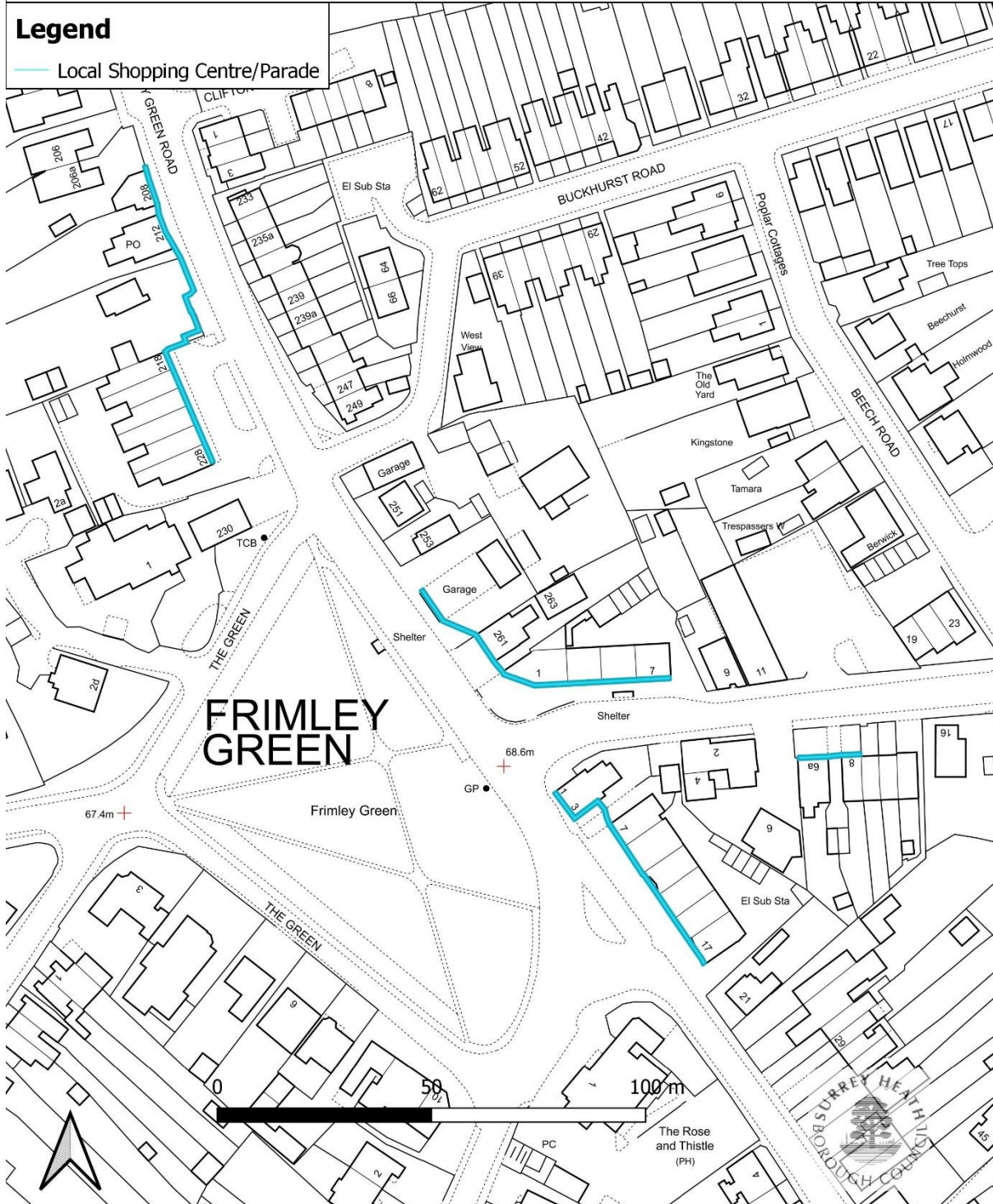


Map 43. Frimley Green Local Centre (Core Strategy 2012, CP9/DM12) - Delete

Not to Standard Scale

Legend

Local Shopping Centre/Parade



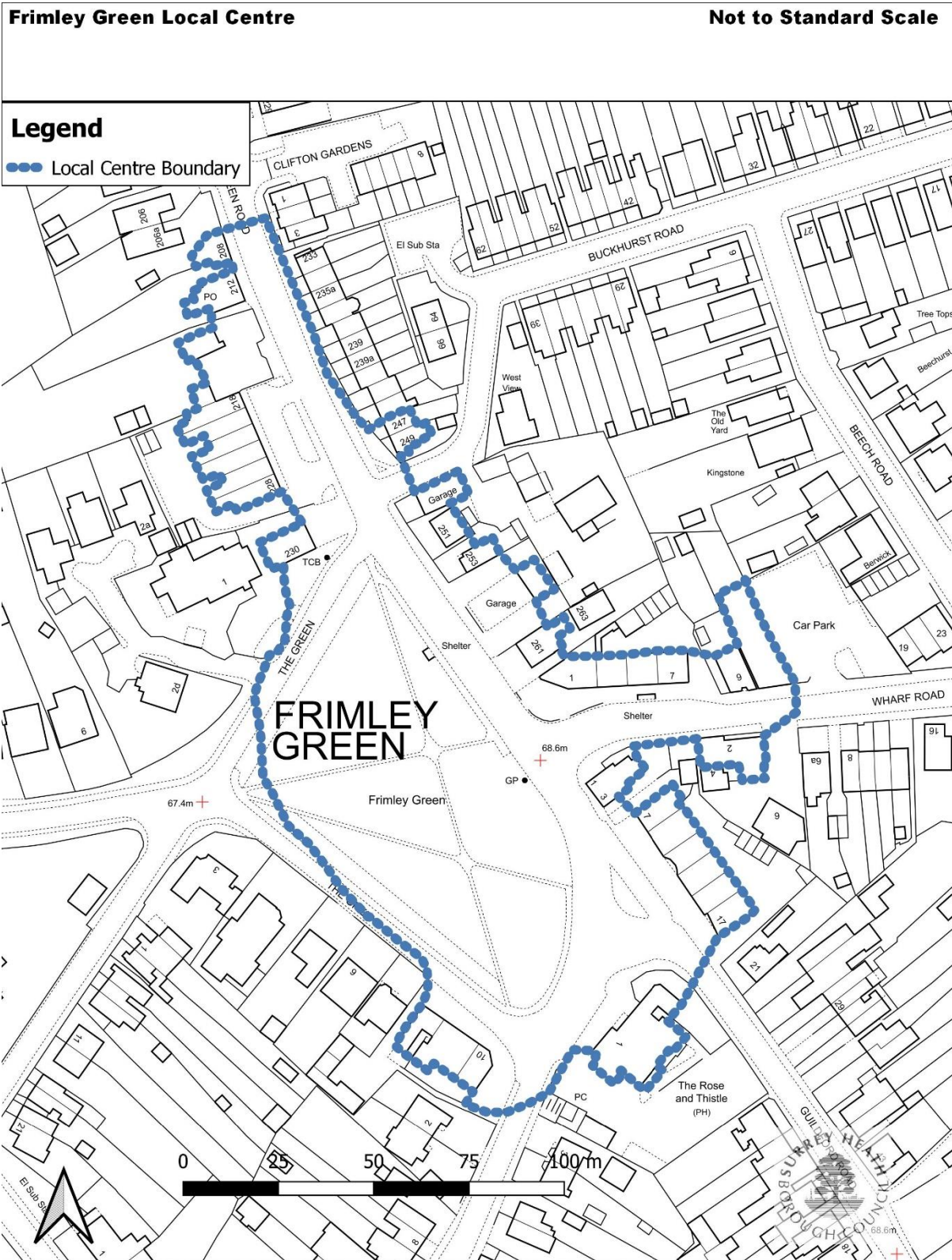
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Map 44. Frimley Green Local Centre (Amended Policy ER9)



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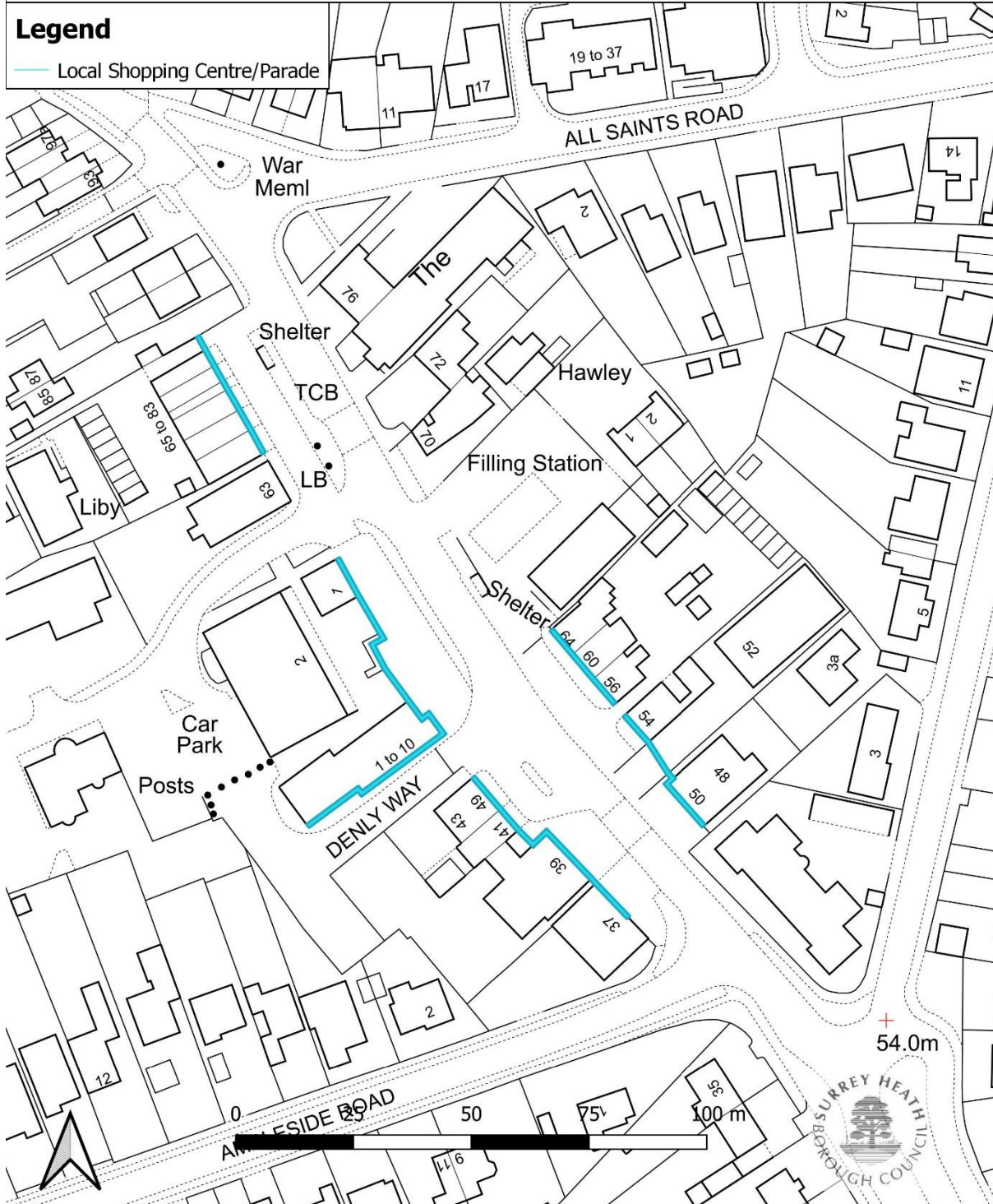


Map 45. Lightwater Local Centre (Core Strategy 2012, CP9/DMI2) - Delete

Not to Standard Scale

Legend

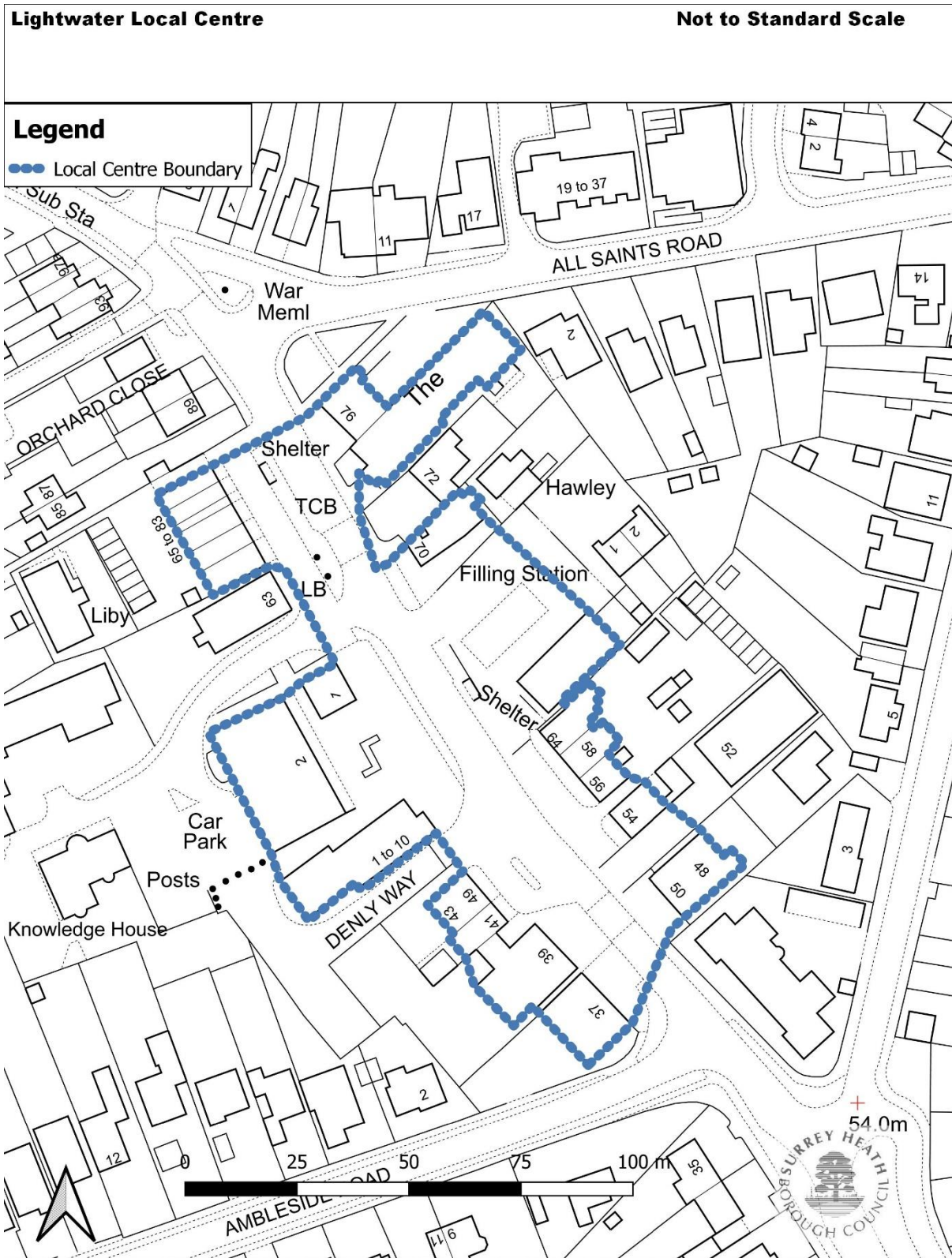
Local Shopping Centre/Parade



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Map 46. Lightwater Local Centre (Amended Policy ER9)



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Map 47. Windlesham Local Centre (Core Strategy 2012, CP9/DM12) - Delete

Not to Standard Scale

Legend

Local Shopping Centre/Parade



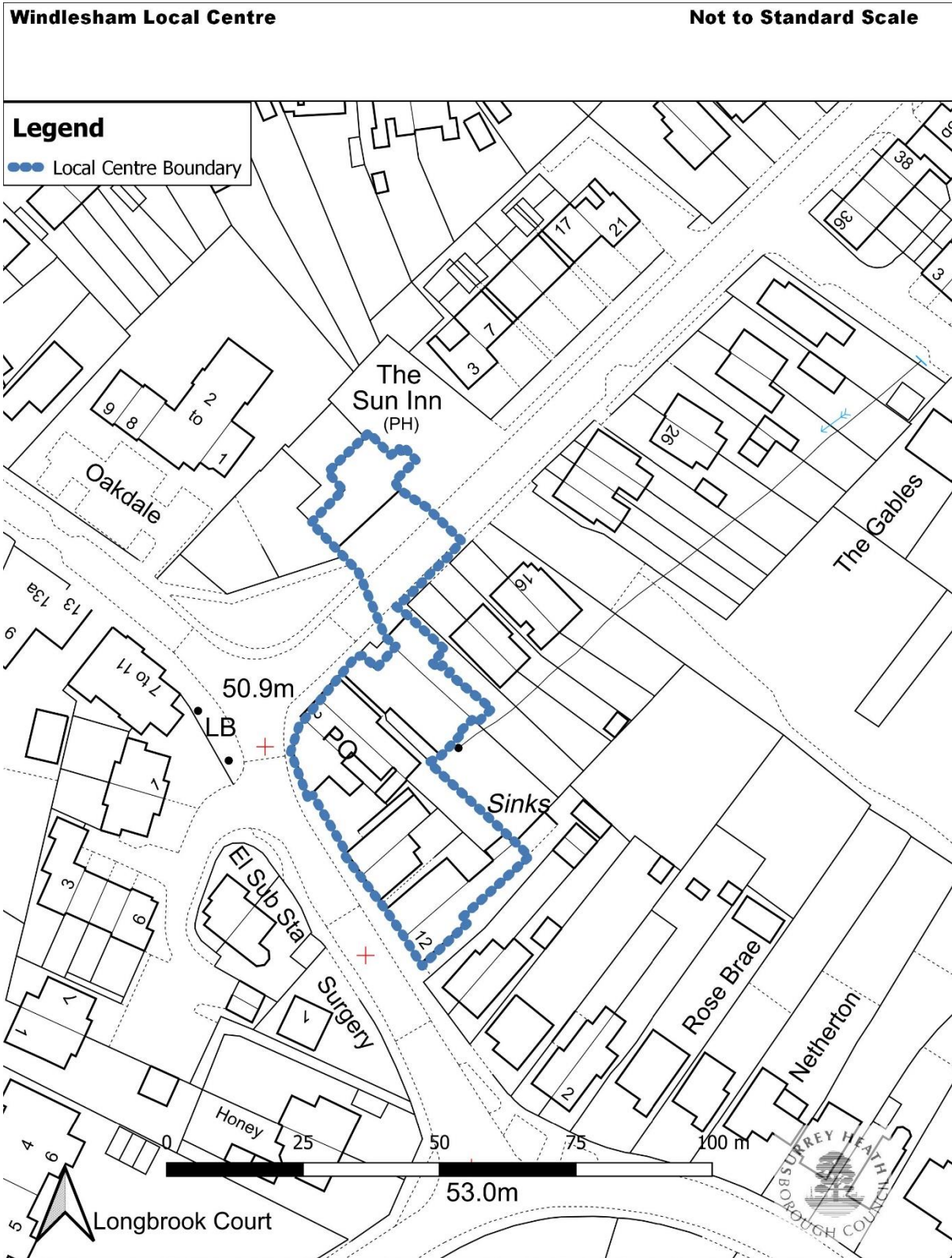
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Map 48. Windlesham Local Centre (Amended Policy ER9)



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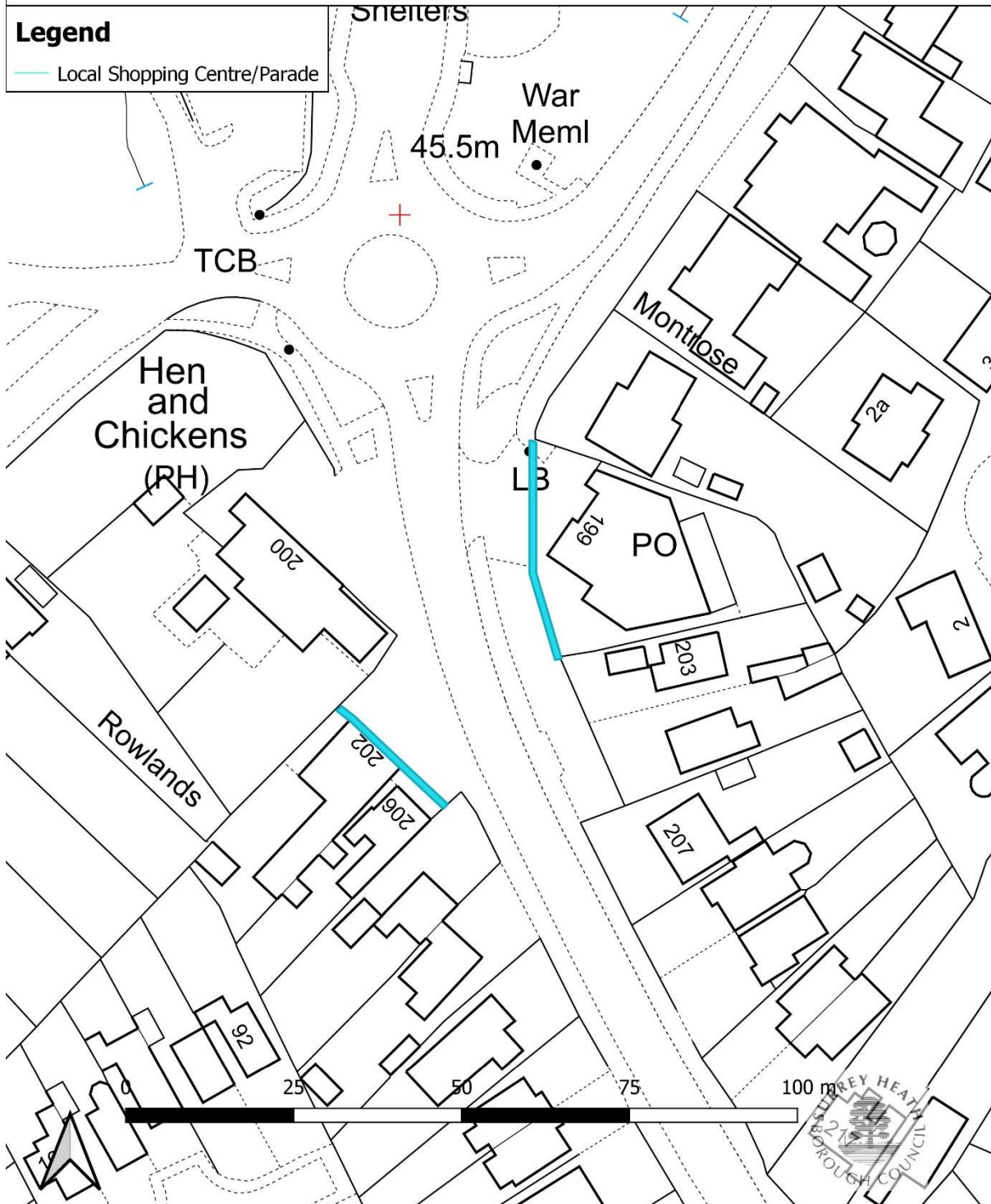


Map 49. Bisley Neighbourhood Parade (Core Strategy 2012 CP9/DMI2) - Delete

Not to Standard Scale

Legend

Local Shopping Centre/Parade



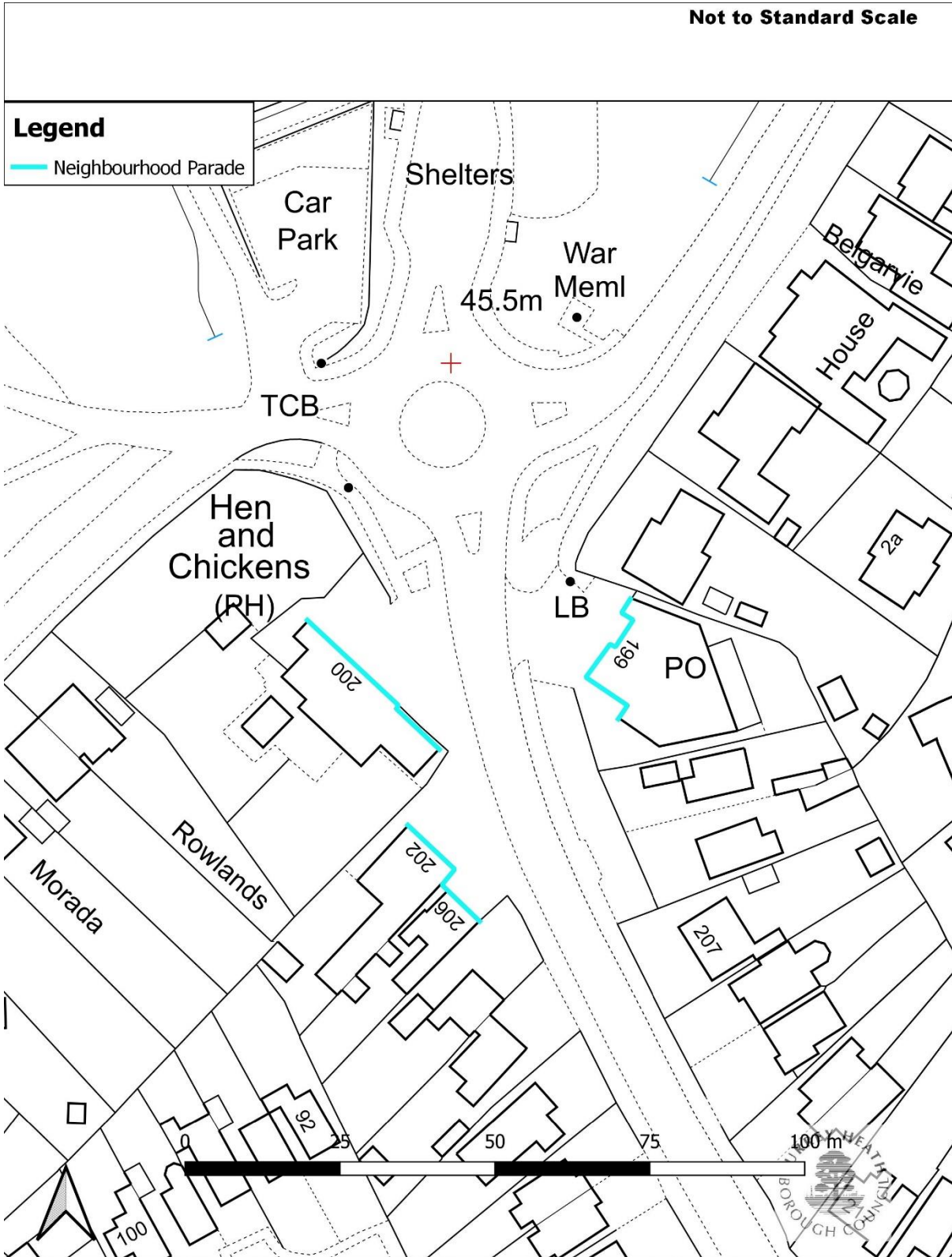
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Map 50. Bisley Neighbourhood Parade (Amended Policy ER9)



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Map 51. London Road/Frimley Road Neighbourhood Parade (Core Strategy 2012 CP9/DM12) - Delete

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Legend

— Local Shopping Centre/Parade



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Map 52. London Road/Frimley Road Neighbourhood Parade (Amended Policy ER9)



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Map 54. Mytchett Neighbourhood Parade (Amended Policy ER9)



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Map 55. Old Dean Neighbourhood Parade (Core Strategy 2012 CP9/DMI2) - Delete

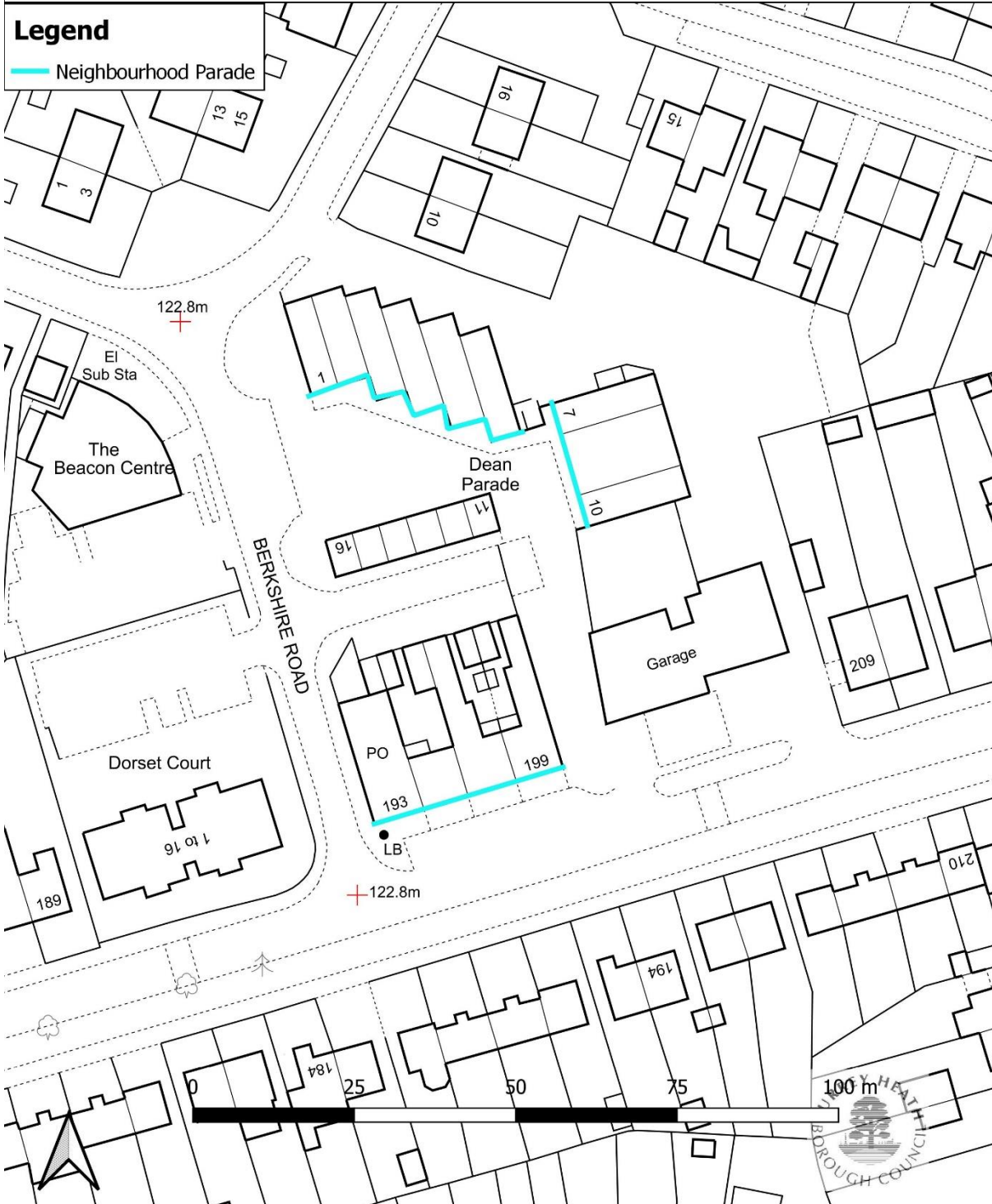


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Map 56. Old Dean Neighbourhood Parade (Amended Policy ER9)

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Map 57. Watchetts Neighbourhood Parade (Core Strategy 2012 CP9/DM12) - Delete

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Legend

Local Shopping Centre/Parade



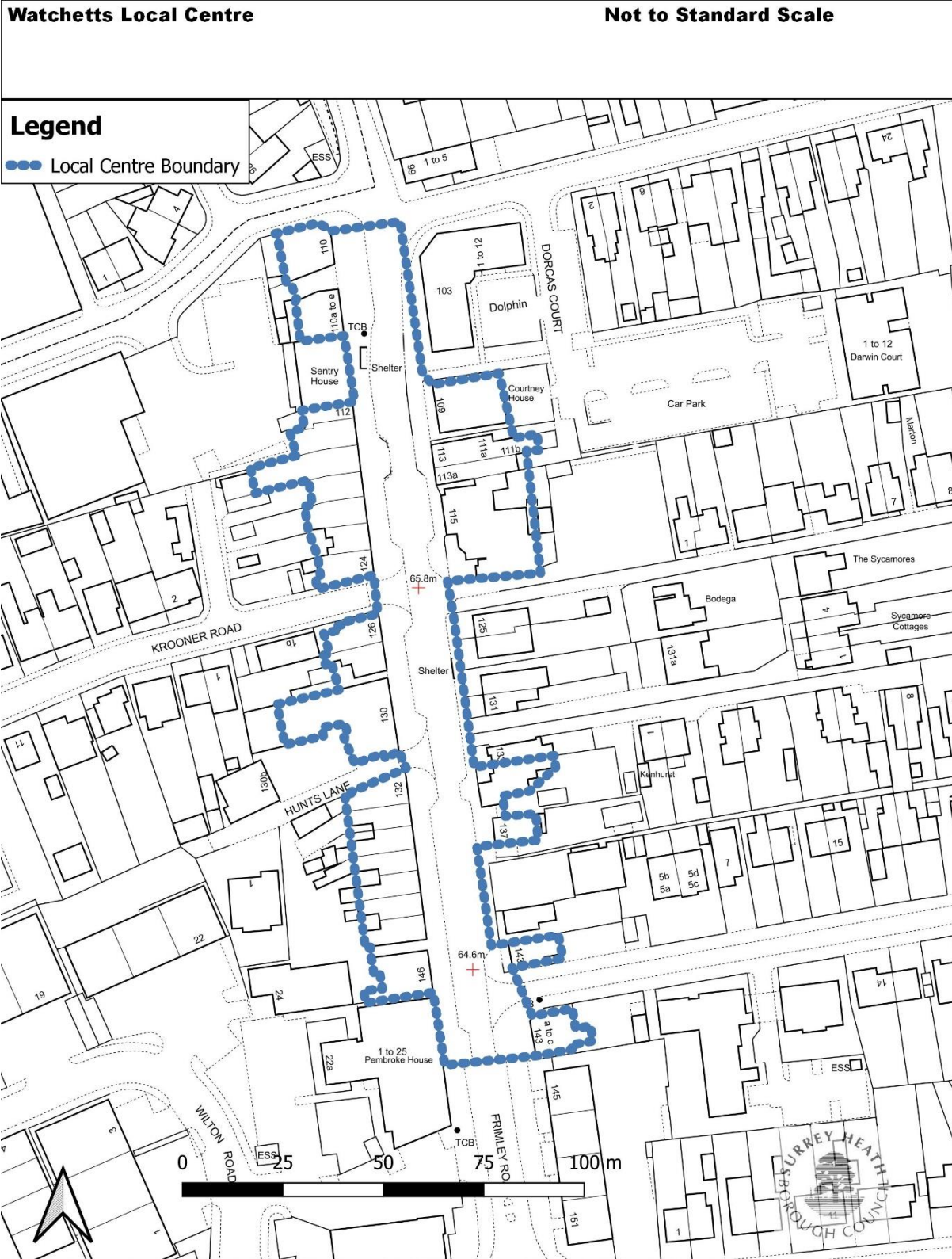
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Map 58. Watchetts Local Centre (Re-designated from Neighbourhood Parade Policy ER9)



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Map 59.

Frimley Park Historic Park and Garden, Policy DH7

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Legend

Historic Parks and Gardens



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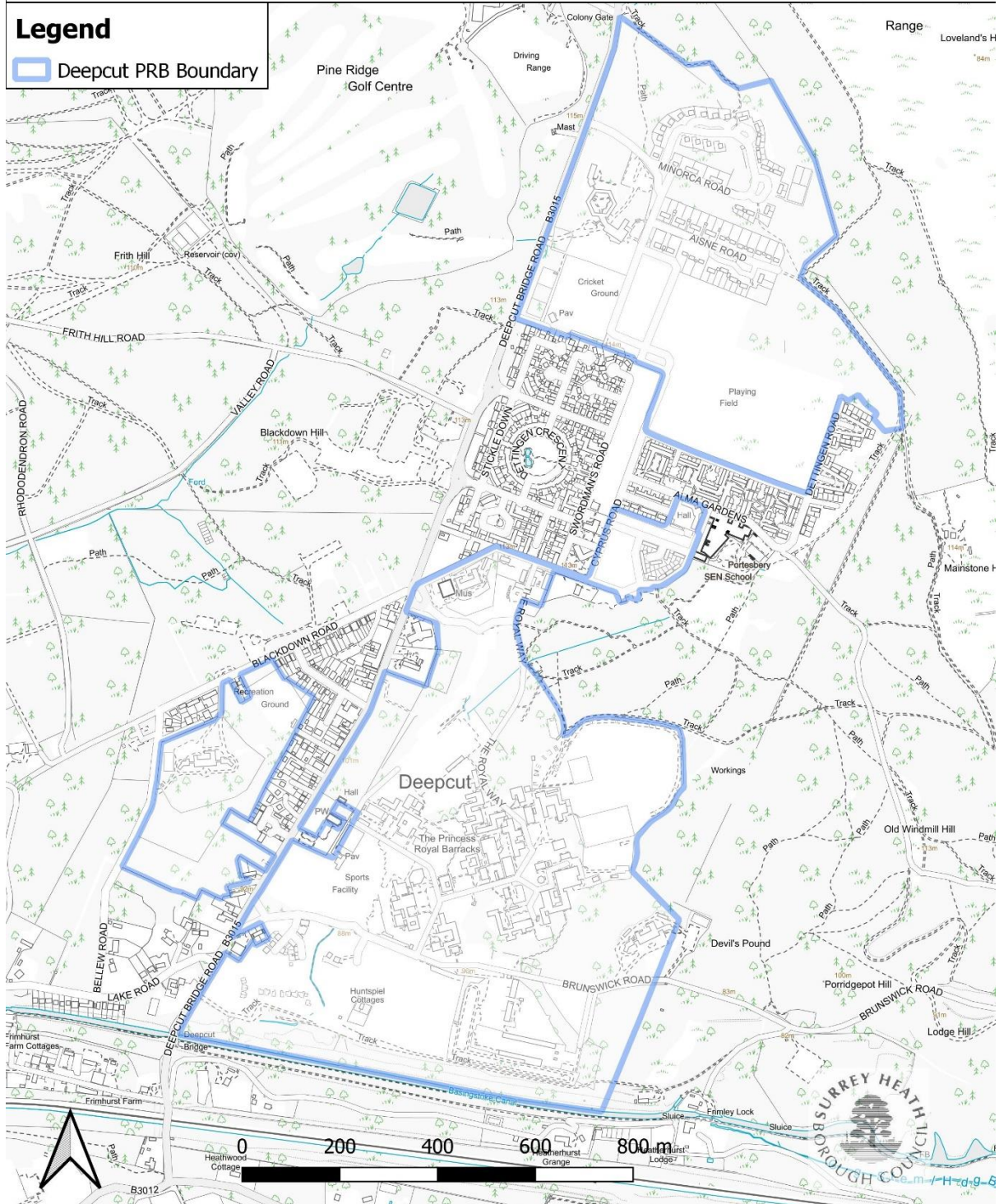
Map 60.

Policy CP4 Deepcut

Not to Standard Scale

Legend

Deepcut PRB Boundary



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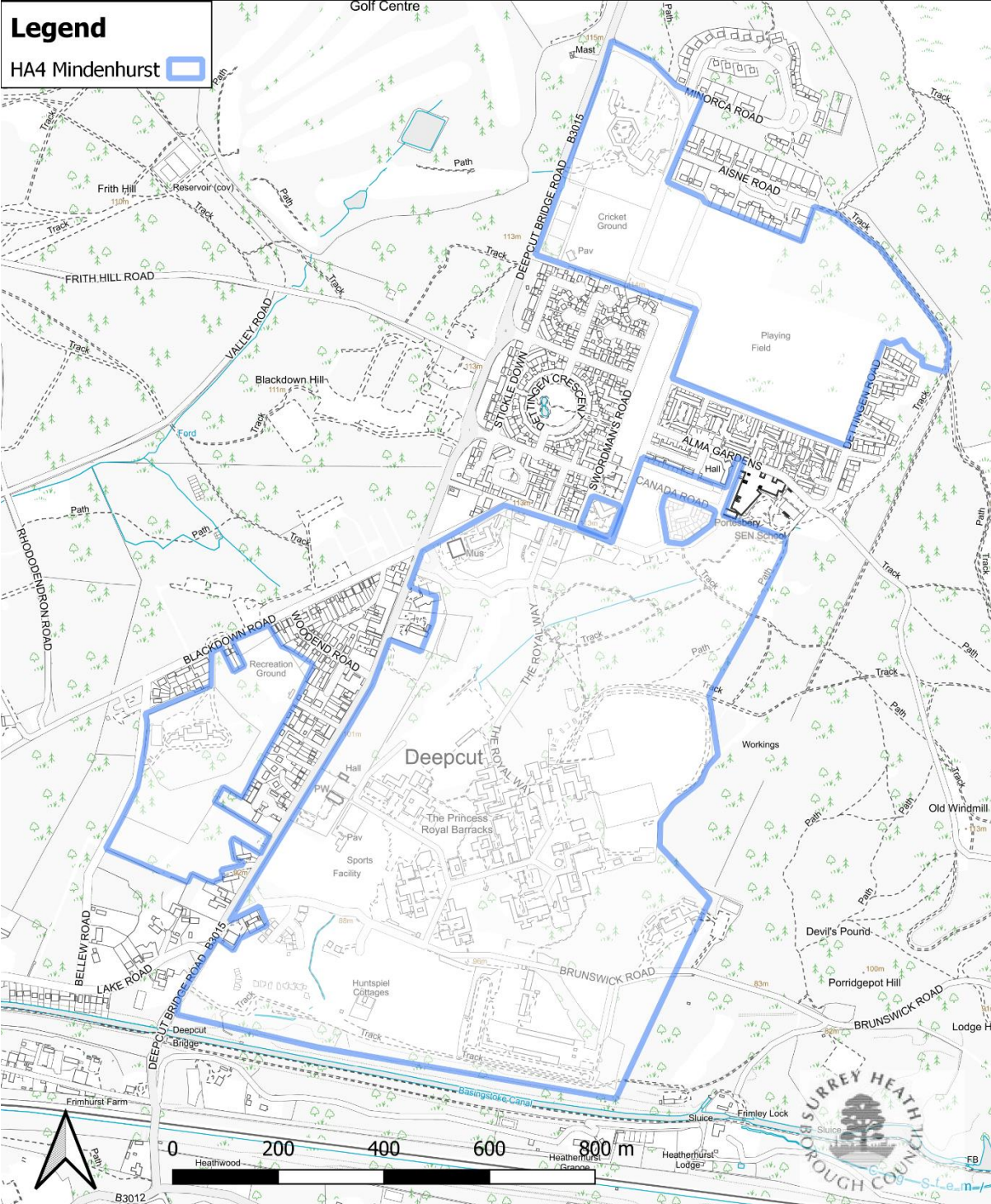
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Map 61.

Policy HA4 Mindenhurst, Deepcut Site Allocation

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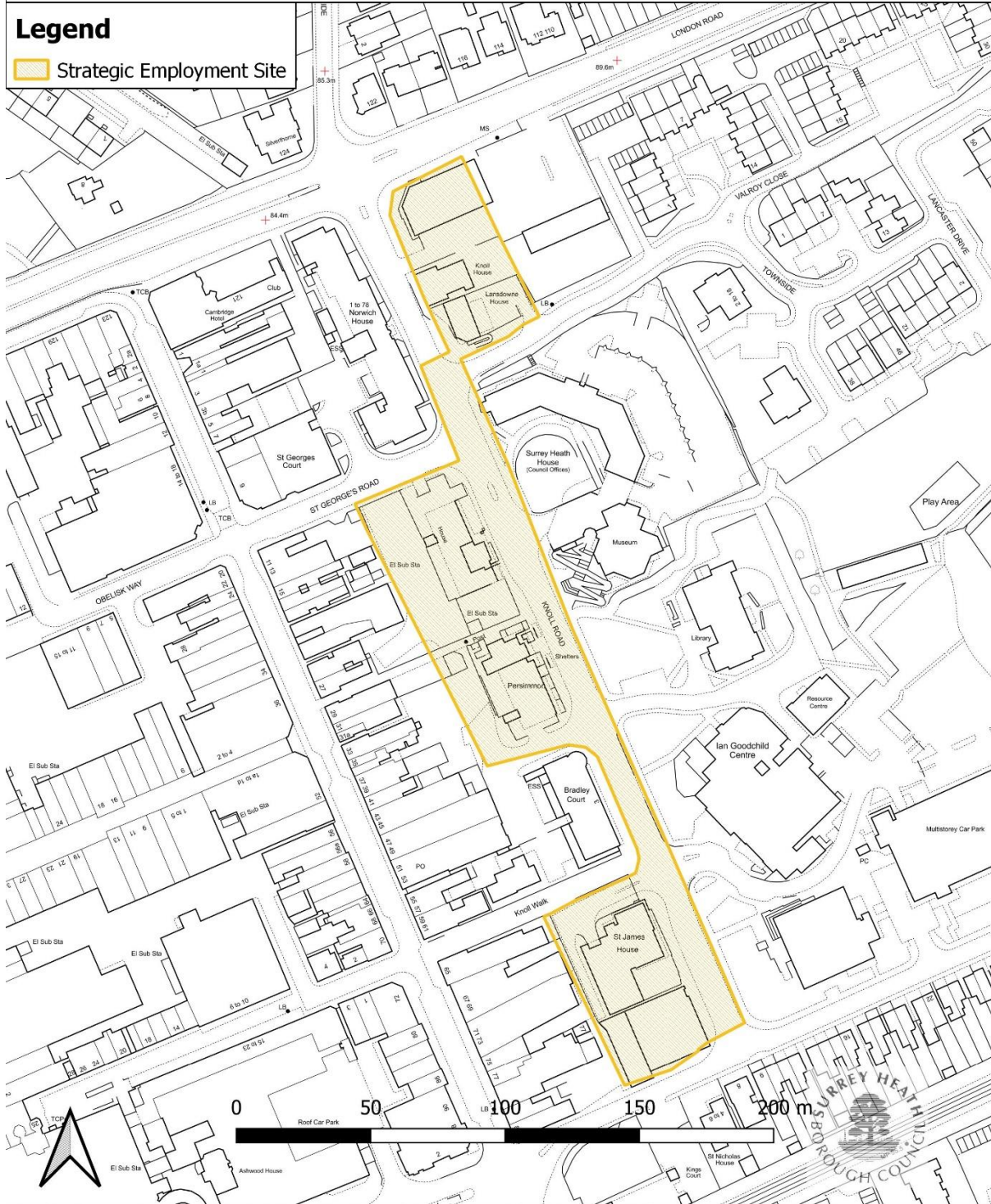
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Map 62.

Policy ER2 Strategic Employment Sites, Camberley Town Centre Not to Standard Scale



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Map 63.

Policy ER2 Strategic Employment Sites, Erl Wood, Windlesham Not to Standard Scale



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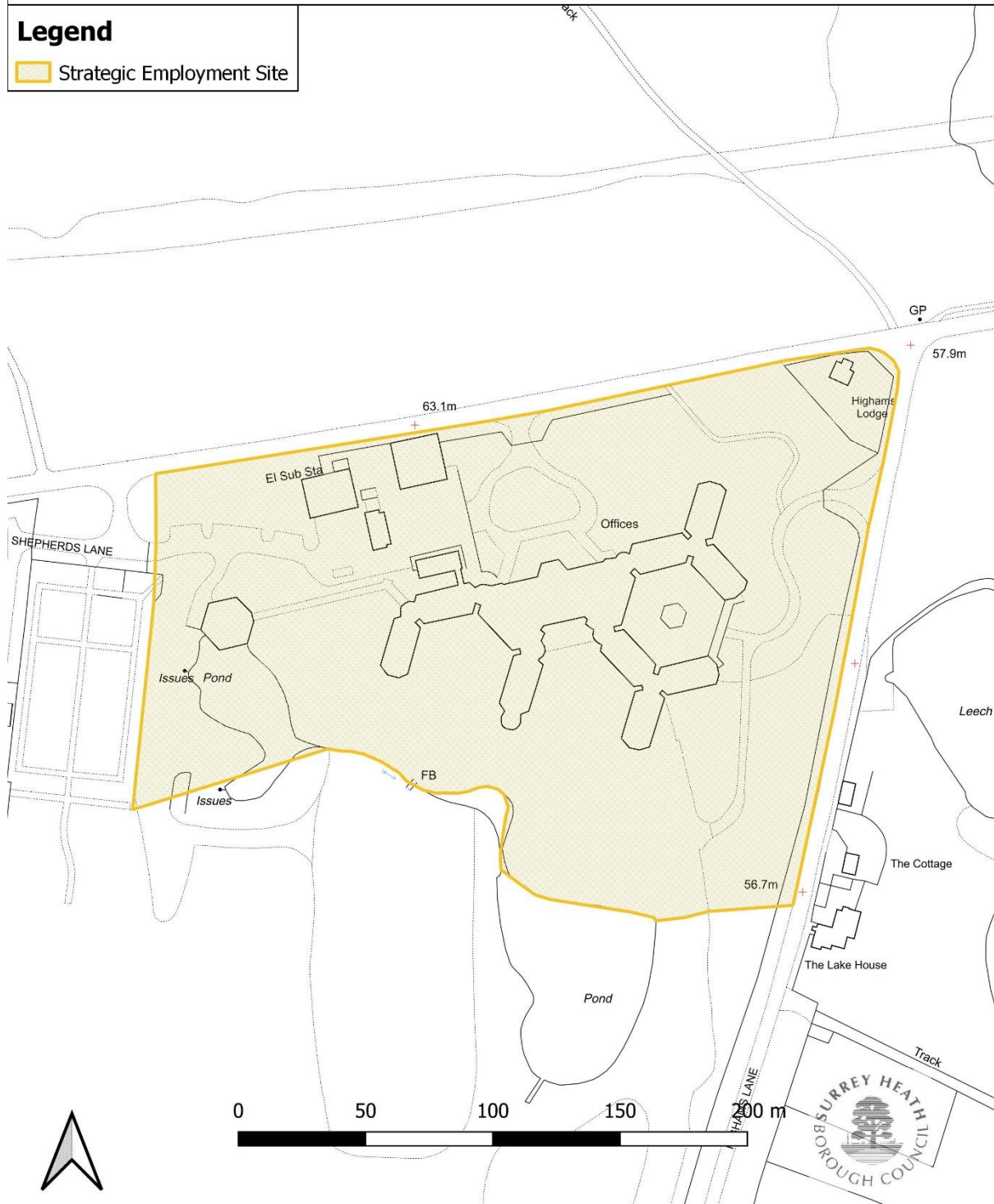
Map 64.

Policy ER2 Strategic Employment Sites, Former British Oxygen Company Site, Windlesham

Not to Standard Scale

Legend

 Strategic Employment Site



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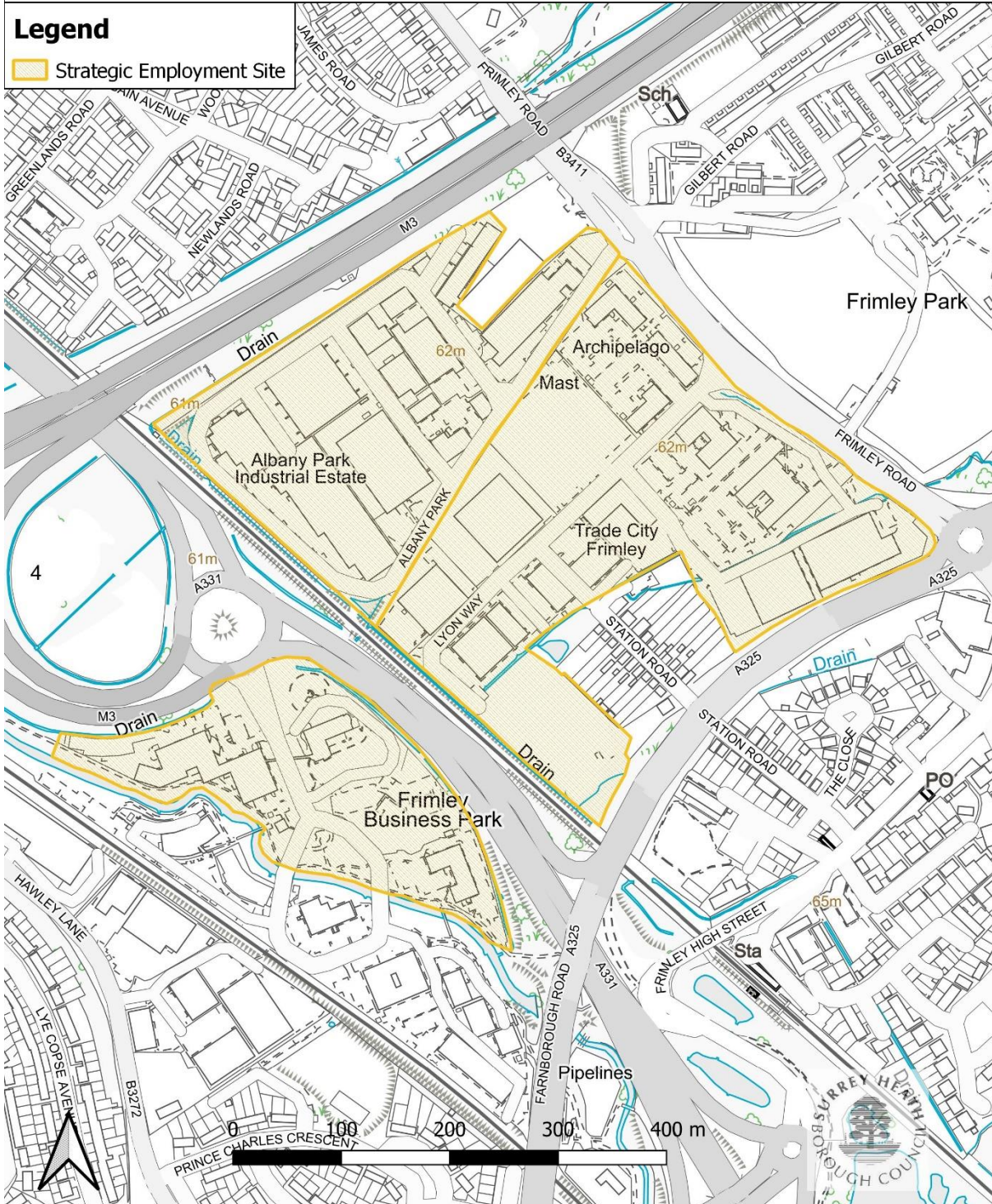
Map 65. Albany Park

Policy ER2 Strategic Employment Sites

Not to Standard Scale

Legend

 Strategic Employment Site



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Map 66.

Policy ER2 Strategic Employment Sites, Mytchett Place, Mytchett Not to Standard Scale

Legend

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Map 67. Yorktown Business Park

Policy ER2 Strategic Employment Sites

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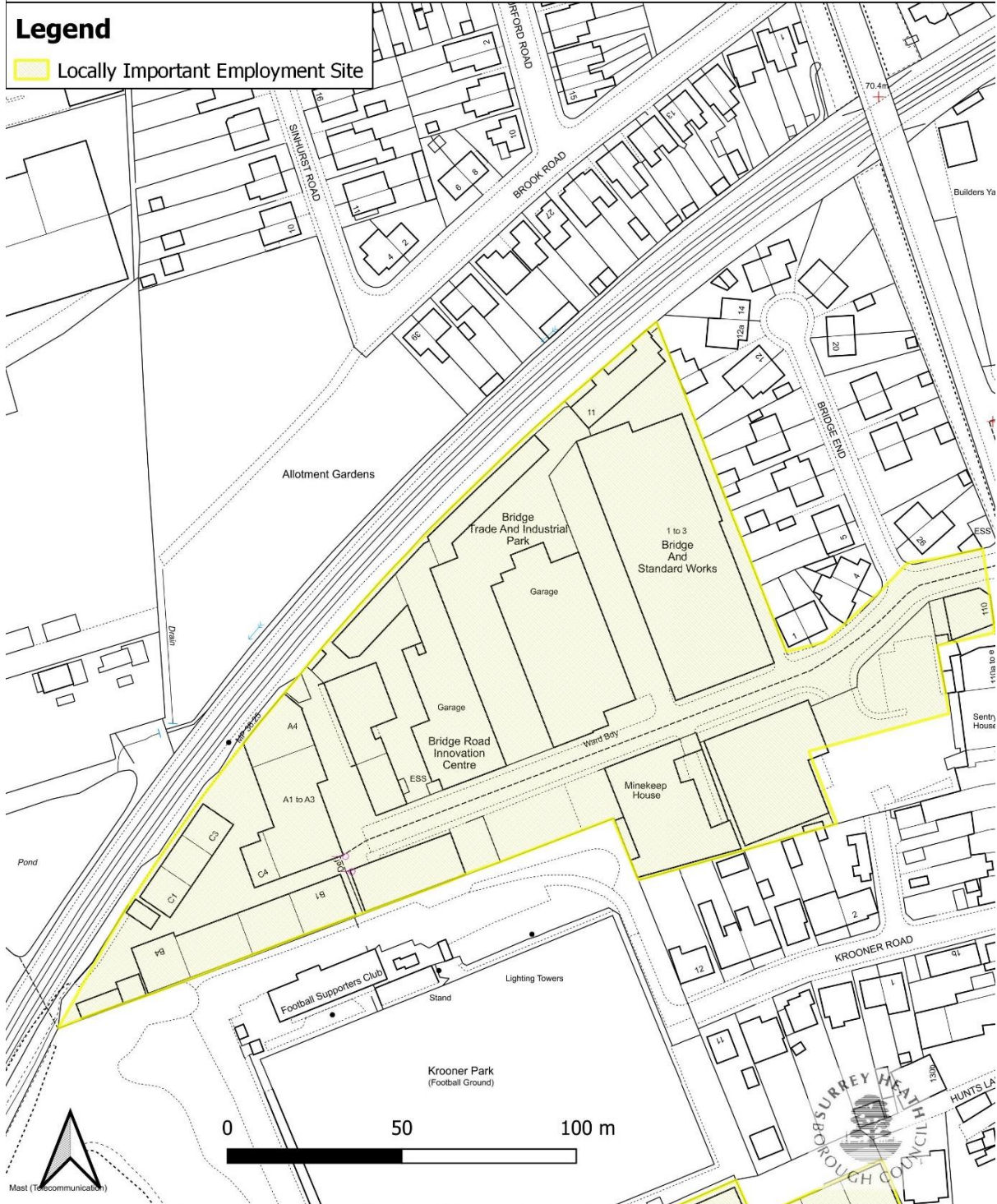
Map 68.

Policy ER3 Locally Important Employment Site, Bridge Trade & Industrial Park, Camberley

Not to Standard Scale

Legend

 Locally Important Employment Site



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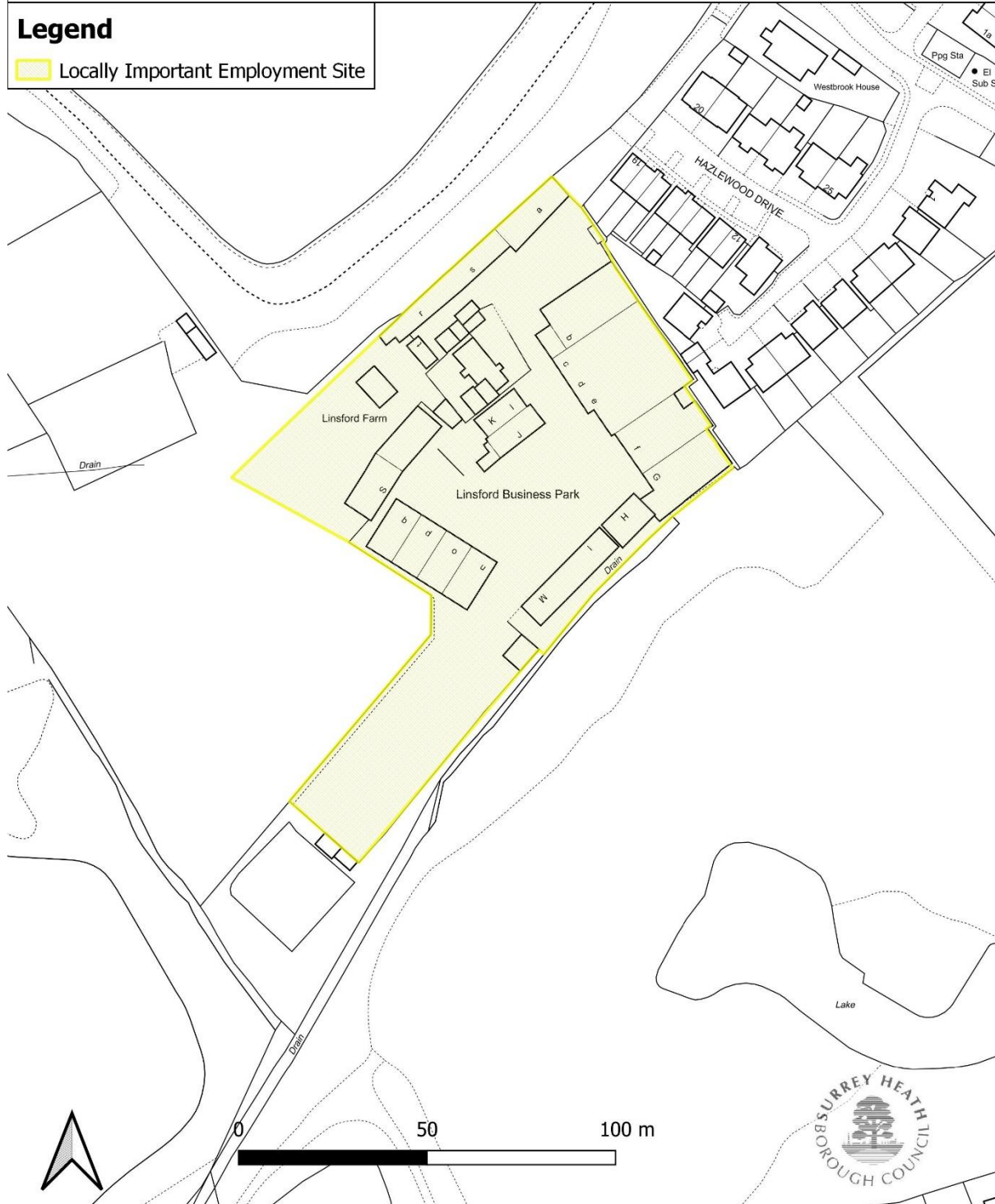
Map 69.

Policy ER3 Locally Important Employment Site, Linsford Business Centre, Mytchett

Not to Standard Scale

Legend

 Locally Important Employment Site



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Map 70.

Policy ER3 Locally Important Employment Site, SC Johnson, Frimley Green

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 Locally Important Employment Site



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Map 71.

Policy ER3 Locally Important Employment Site, St Georges Industrial Estate & Heli Business Park, Camberley

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Map 72.

Policy ER3 Locally Important Employment Site, Tanners Yard, Bagshot

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 Locally Important Employment Site



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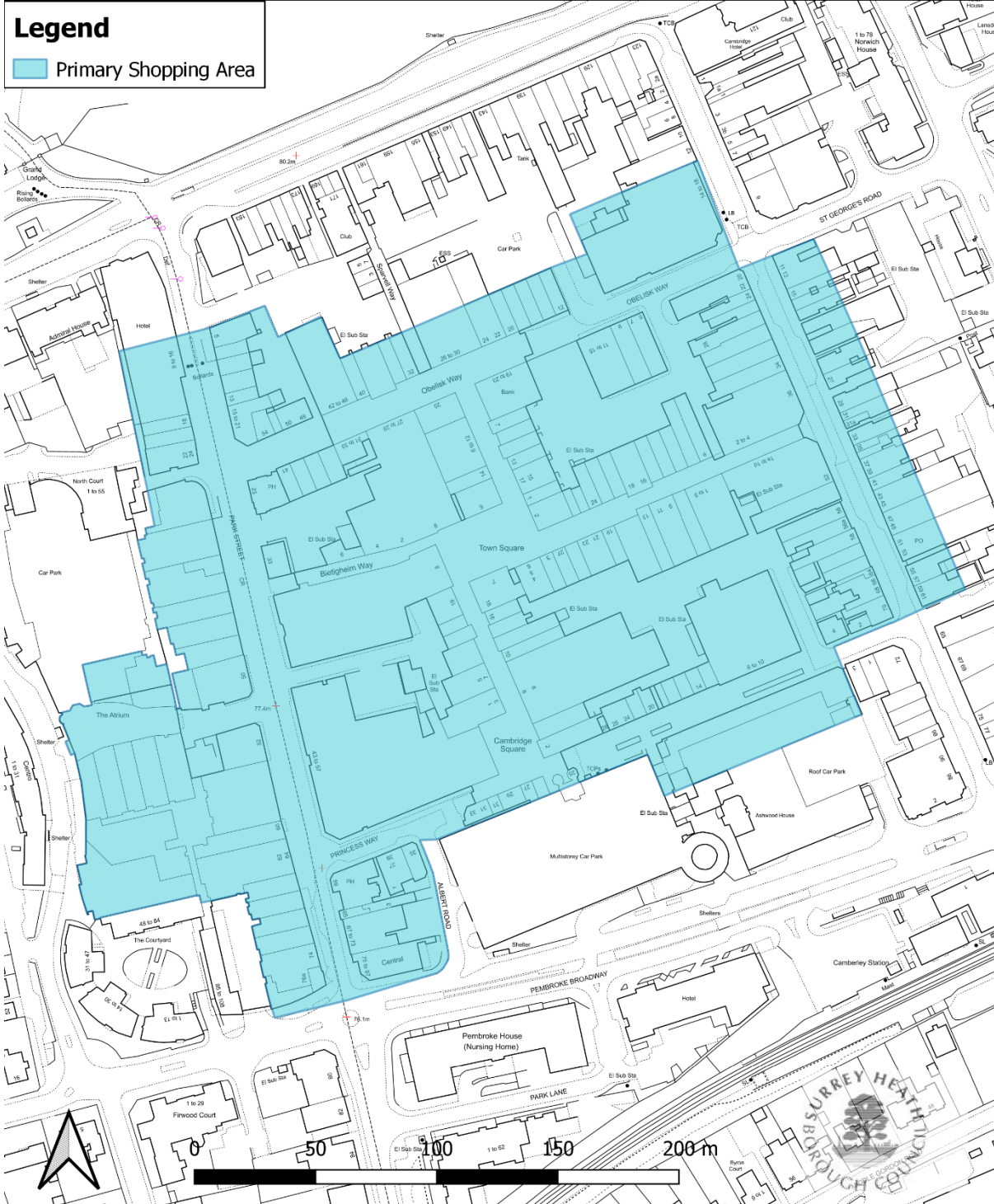
Map 73.

Policy CTC2 Camberley Town Centre Primary Shopping Area

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Legend

Primary Shopping Area



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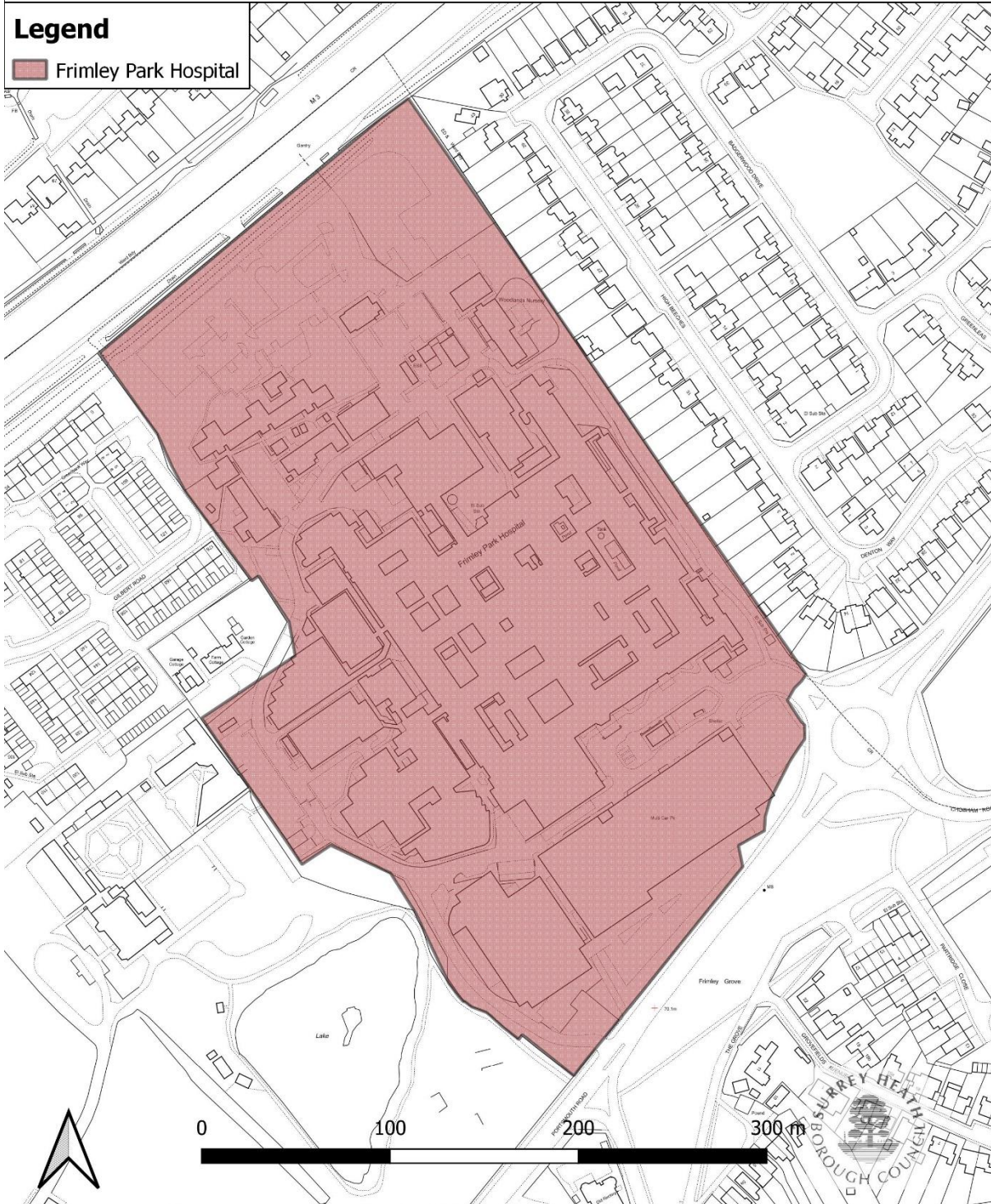
Map 74.

Frimley Park Hospital, Policy ER6

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Legend

Frimley Park Hospital



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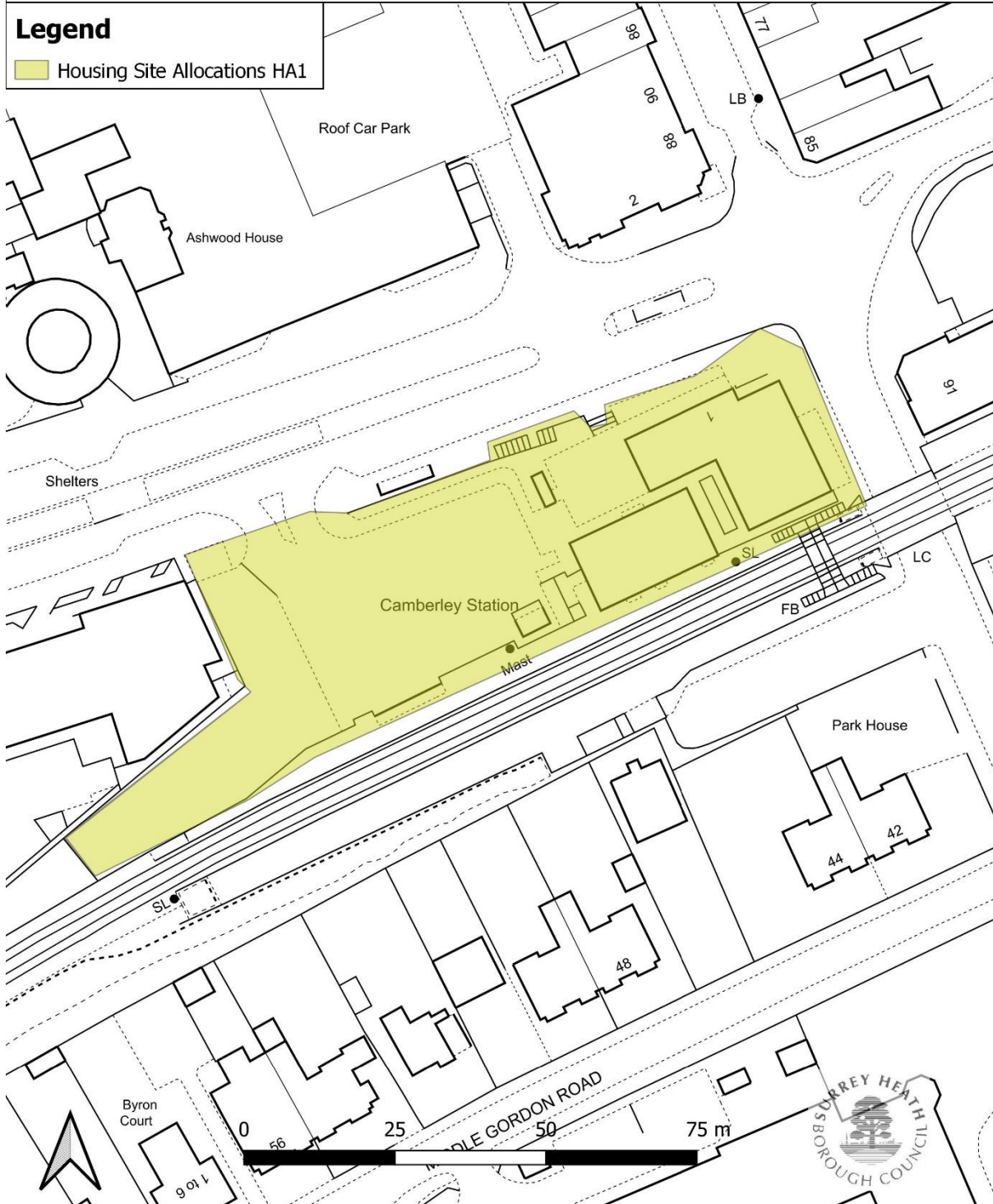
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Policy HA1/06, Camberley Station, Station House, Camberley Not to Standard Scale



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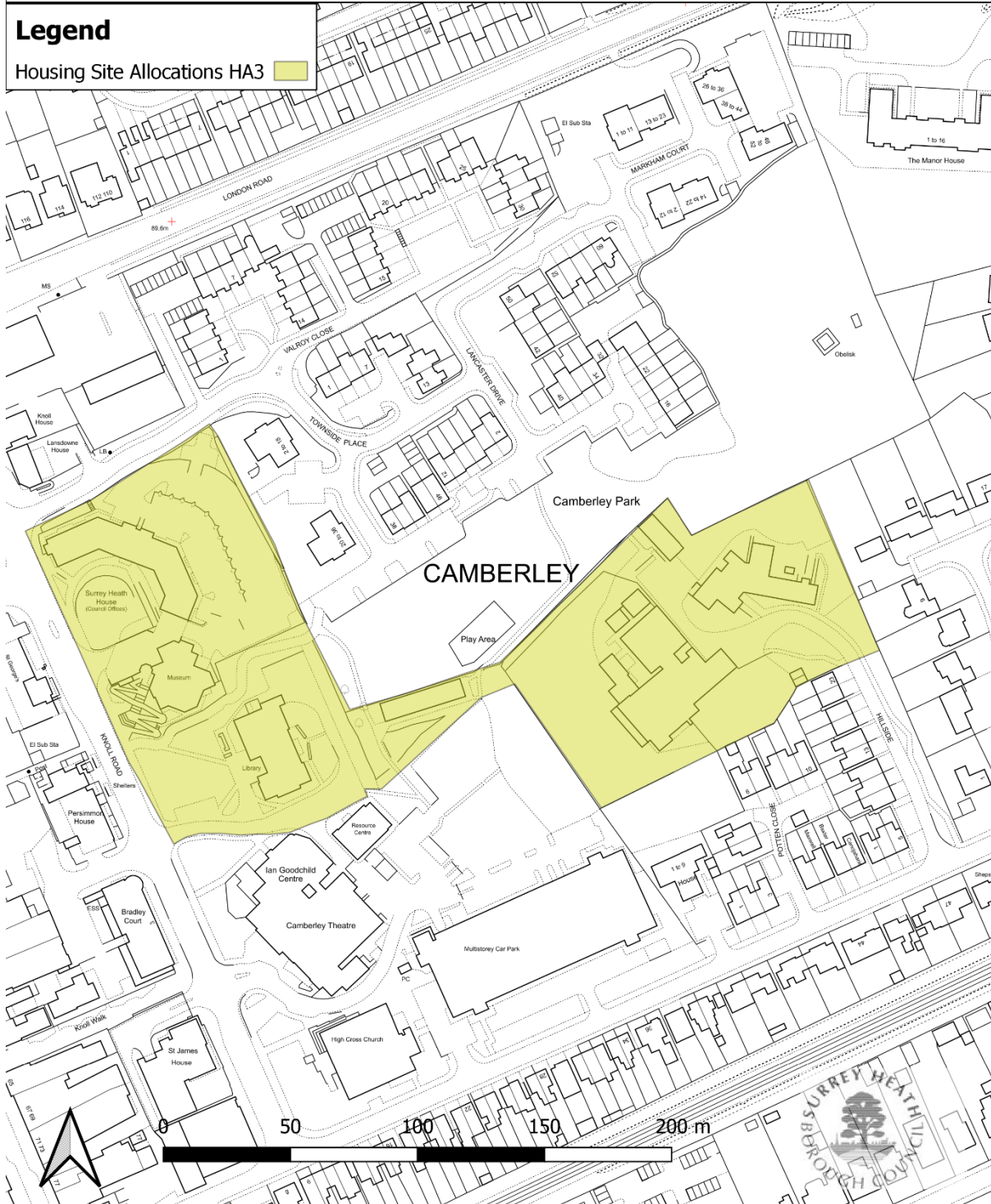
Map 76.

Policy HA3 Land East of Knoll Road

Not to Standard Scale

Legend

Housing Site Allocations HA3



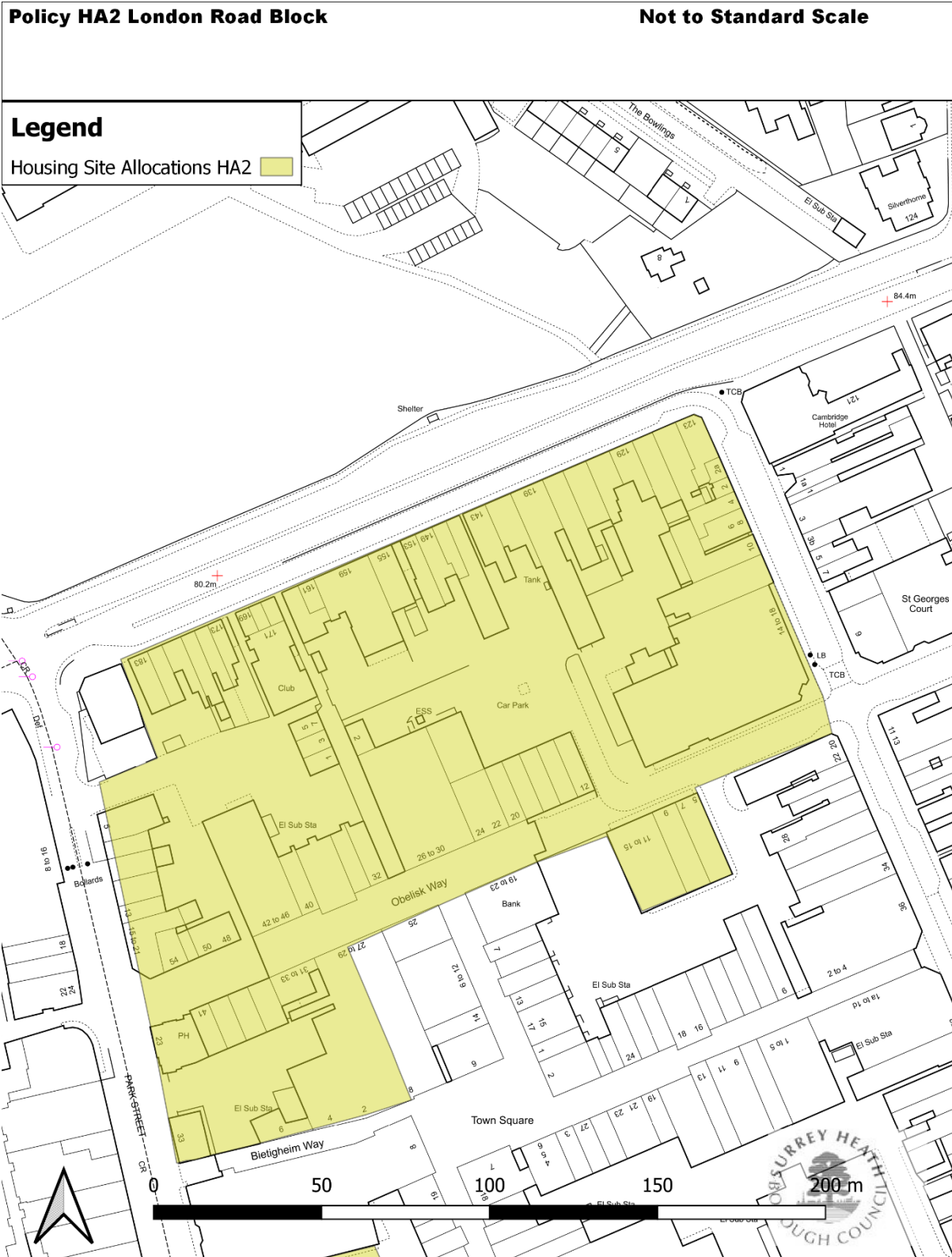
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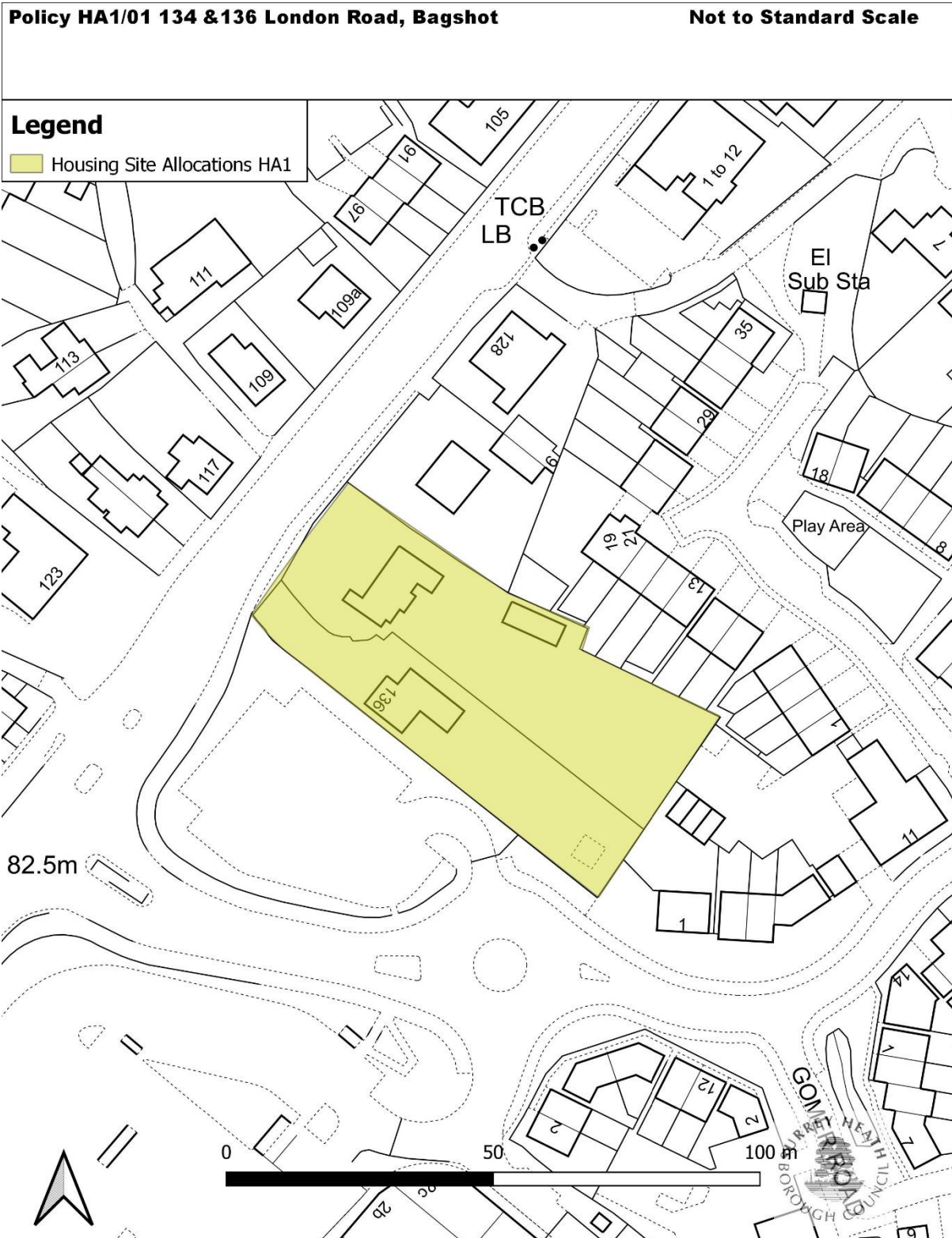
Map 77.



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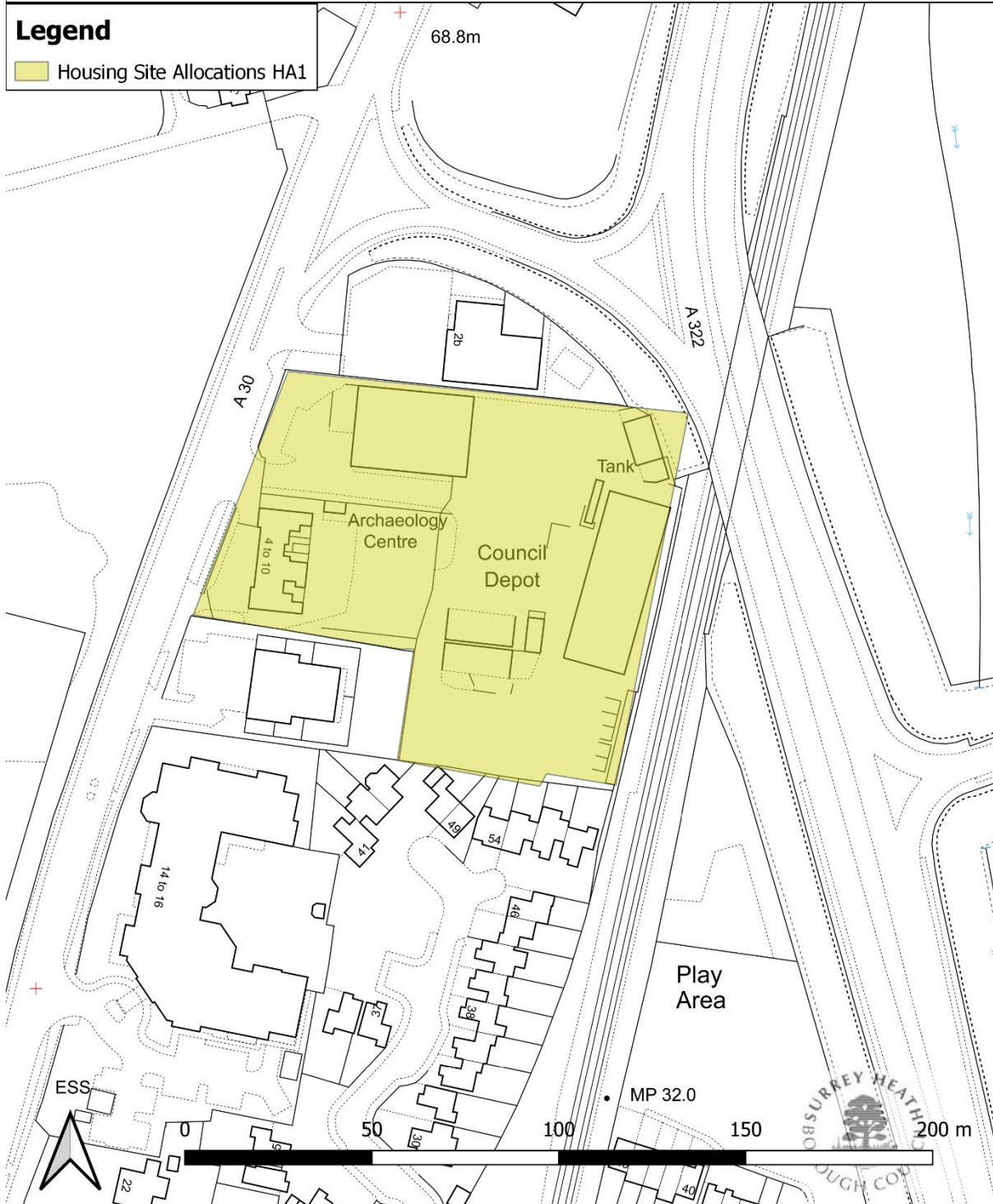
Map 79.

Policy HA1/02 Bagshot Highway Depot and Archaeological Centre, London Road

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Legend

Housing Site Allocations HA1



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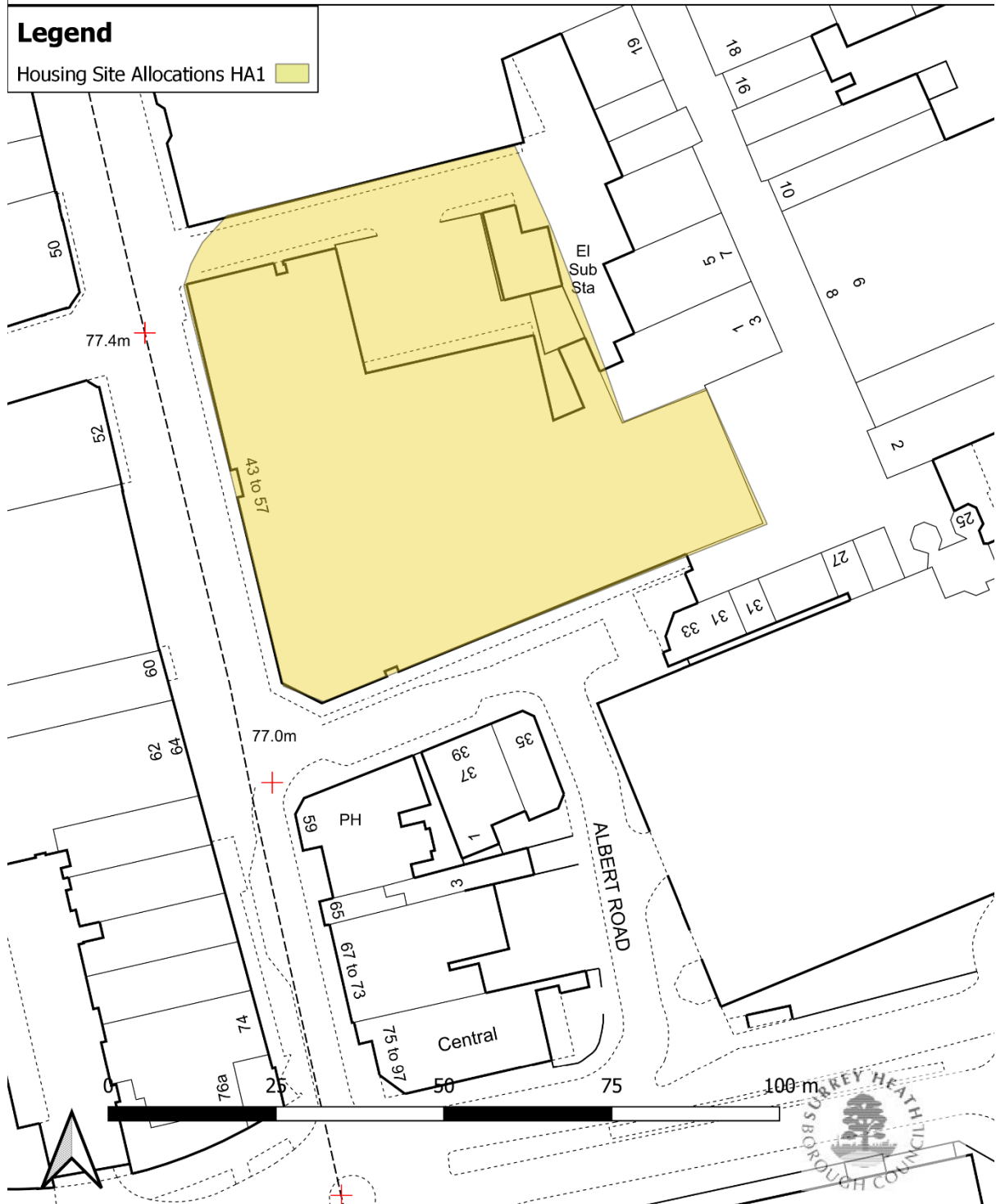
Map 80.

Policy HA1/03 Land East of Park Street, North of Princess Way, Camberley

Not to Standard Scale

Legend

Housing Site Allocations HA1 



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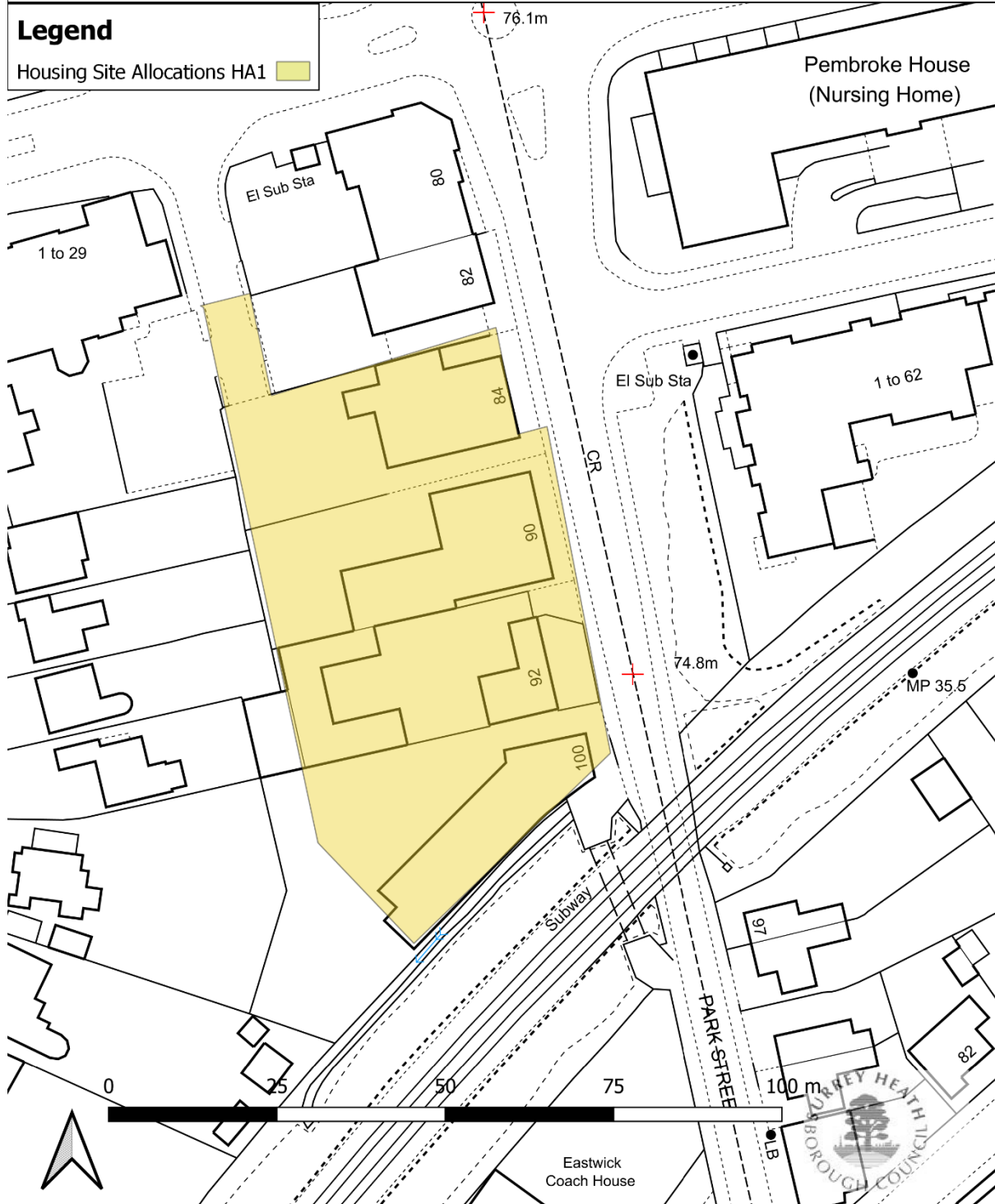
Map 81.

Policy HA1/04 84-100 Park Street, Camberley

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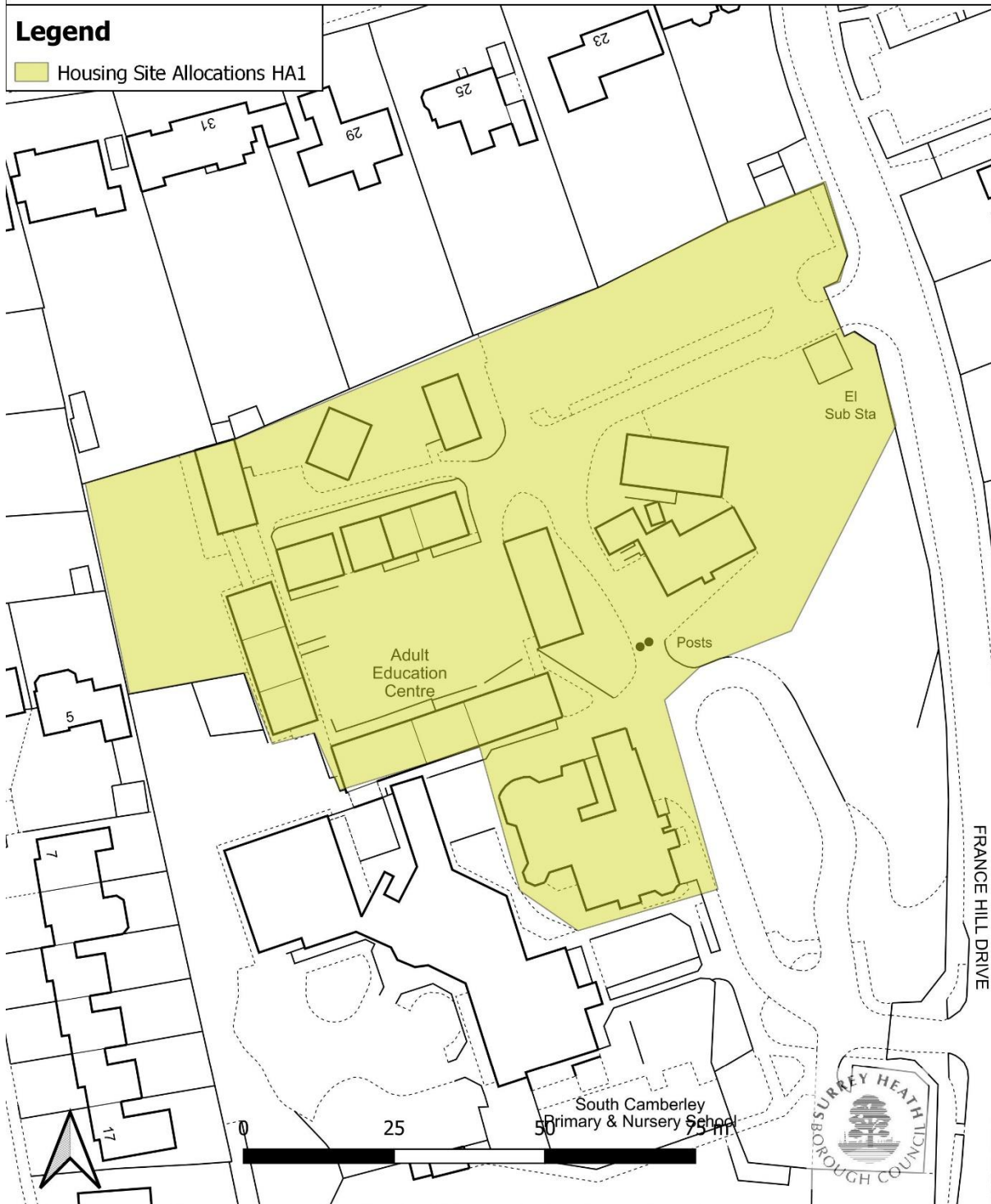
Map 82.

Policy HA1/05, Adult Education Centre, France Hill Drive, Camberley

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 Housing Site Allocations HA1



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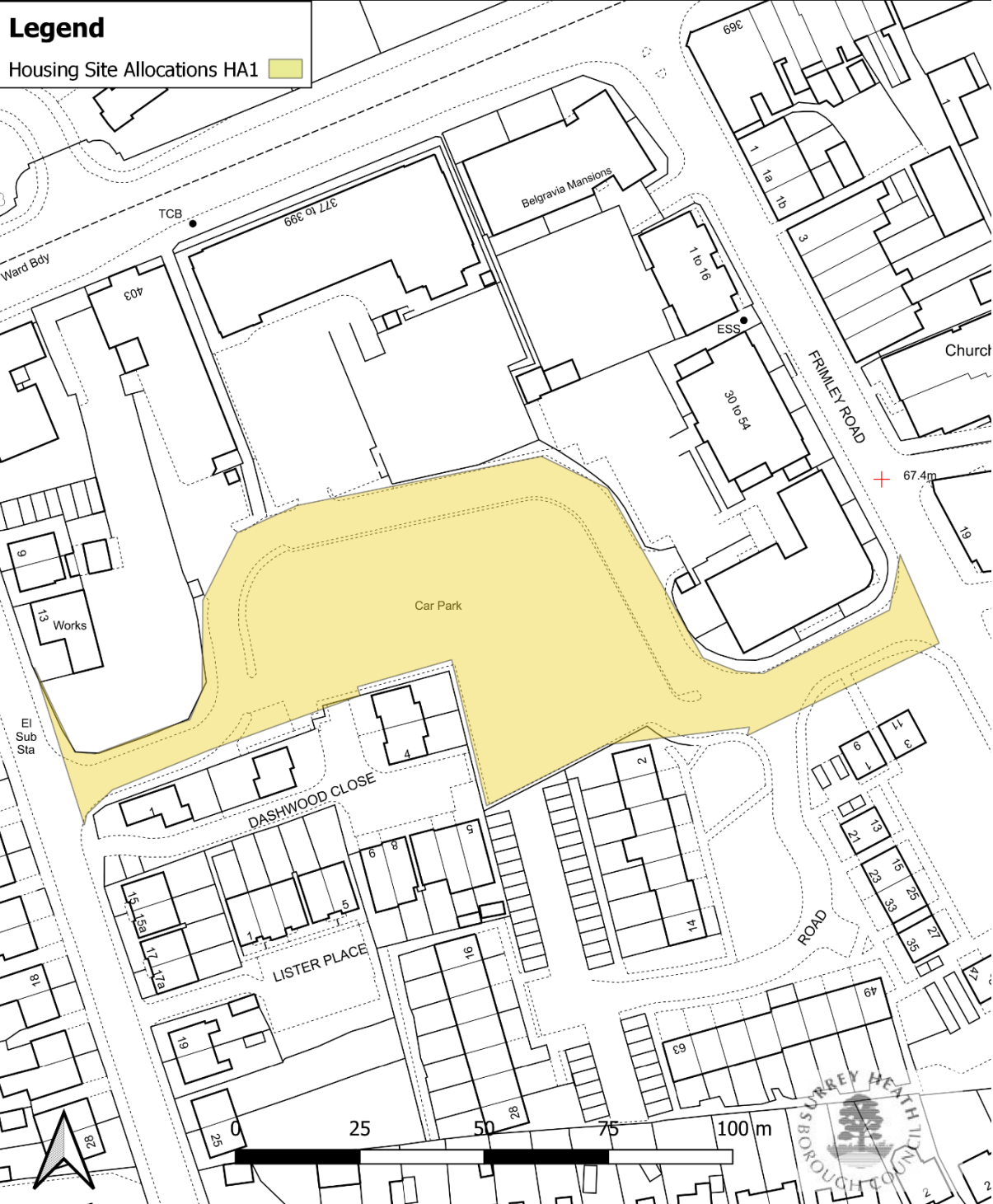
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Map 83.

Policy HA1/07 York Town Car Park, Sullivan Road, Camberley

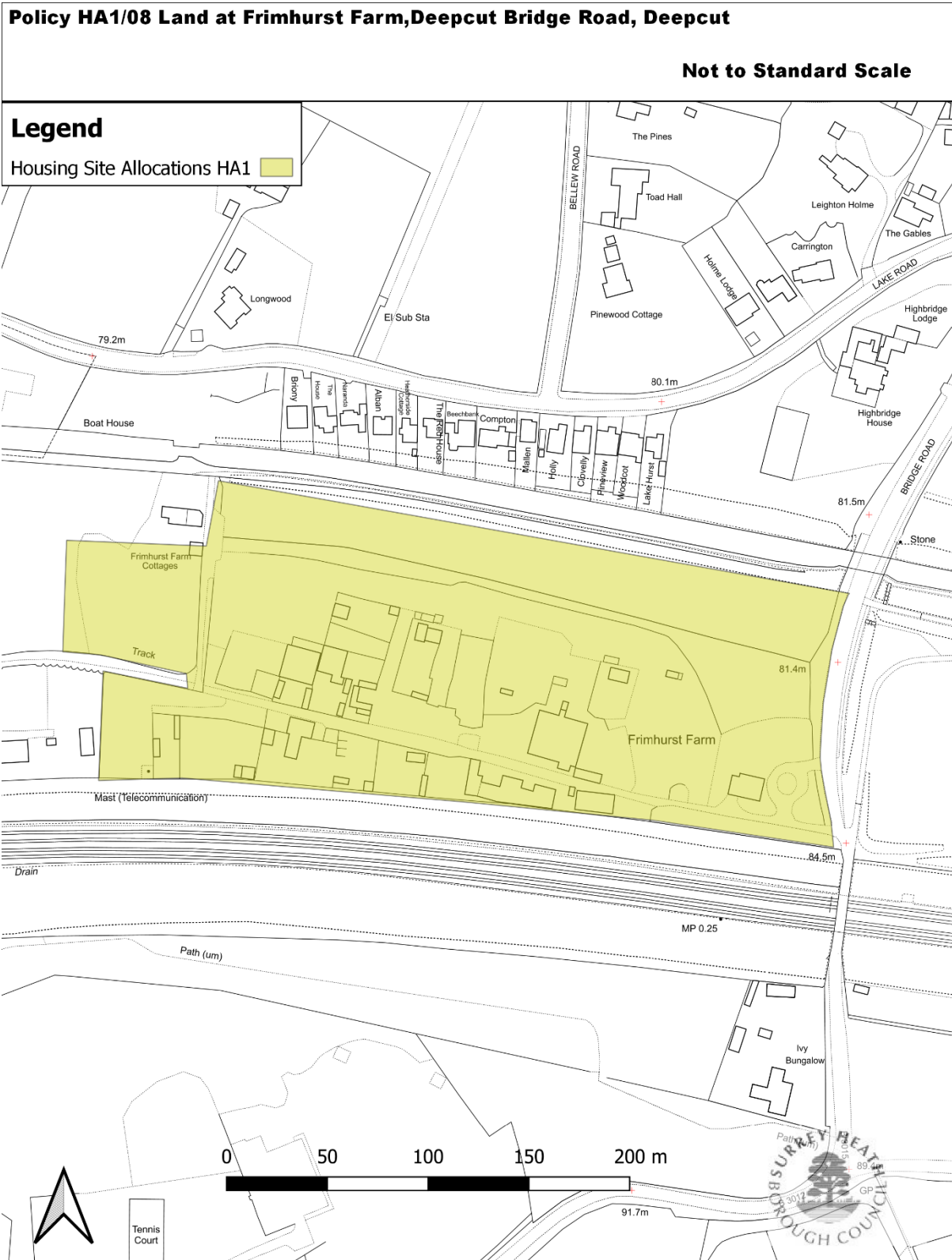
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Map 84.



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Map 85.

Policy HA1/09, Sir William Siemens Square, Frimley

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Housing Site Allocations HA1



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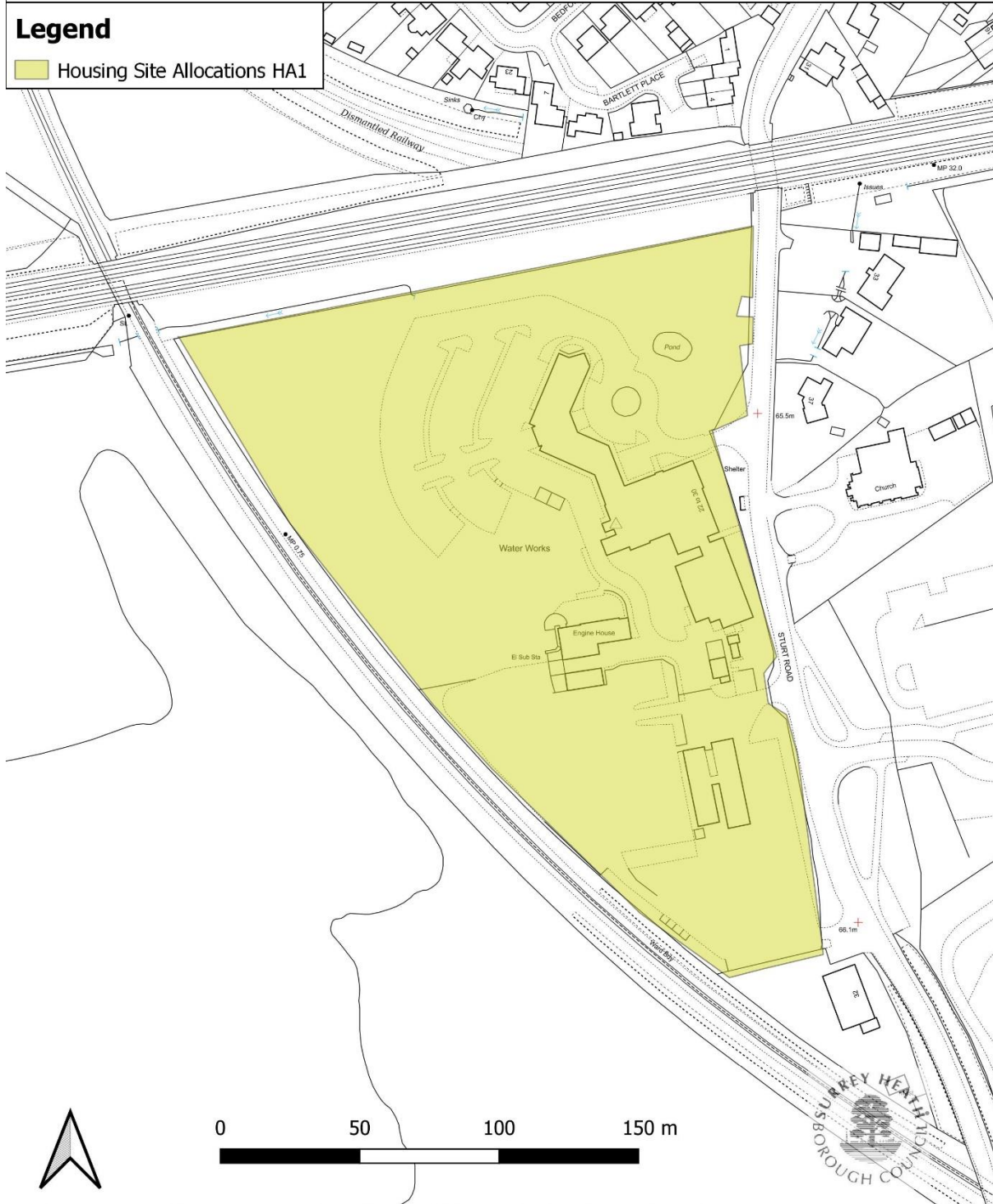


Map 86.

Policy HA1/10, Land West of Sturt Road, Frimley Green **Not to Standard Scale**

Legend

 Housing Site Allocations HA1



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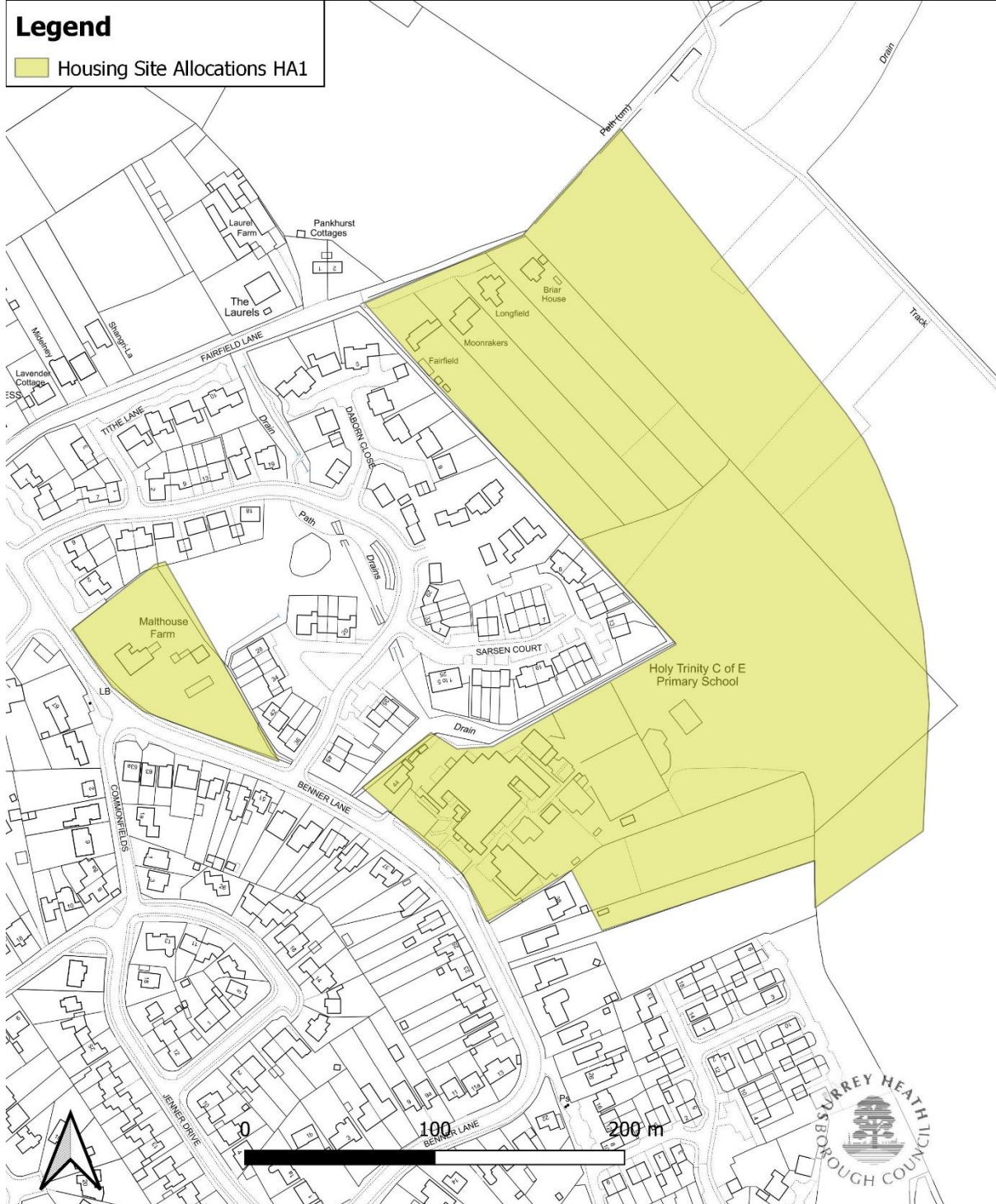
Map 87.

Policy HA1/11, Land East of Benner Lane (partial housing reserve site), West End

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Legend

 Housing Site Allocations HA1



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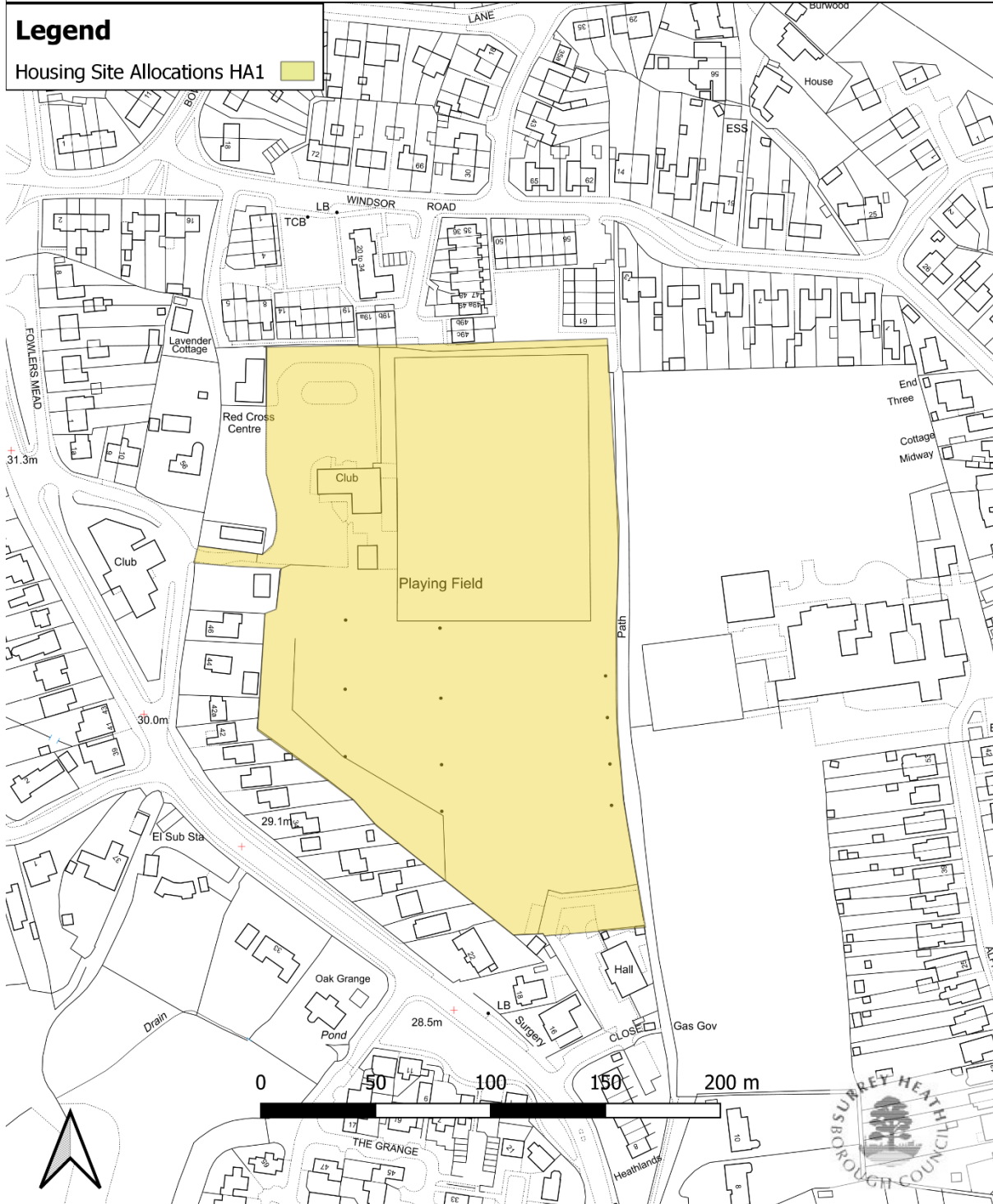


Map 88.

Policy HA1/13 Chobham Rugby Club, Windsor Road, Chobham **Not to Standard Scale**

Legend

Housing Site Allocations HA1 



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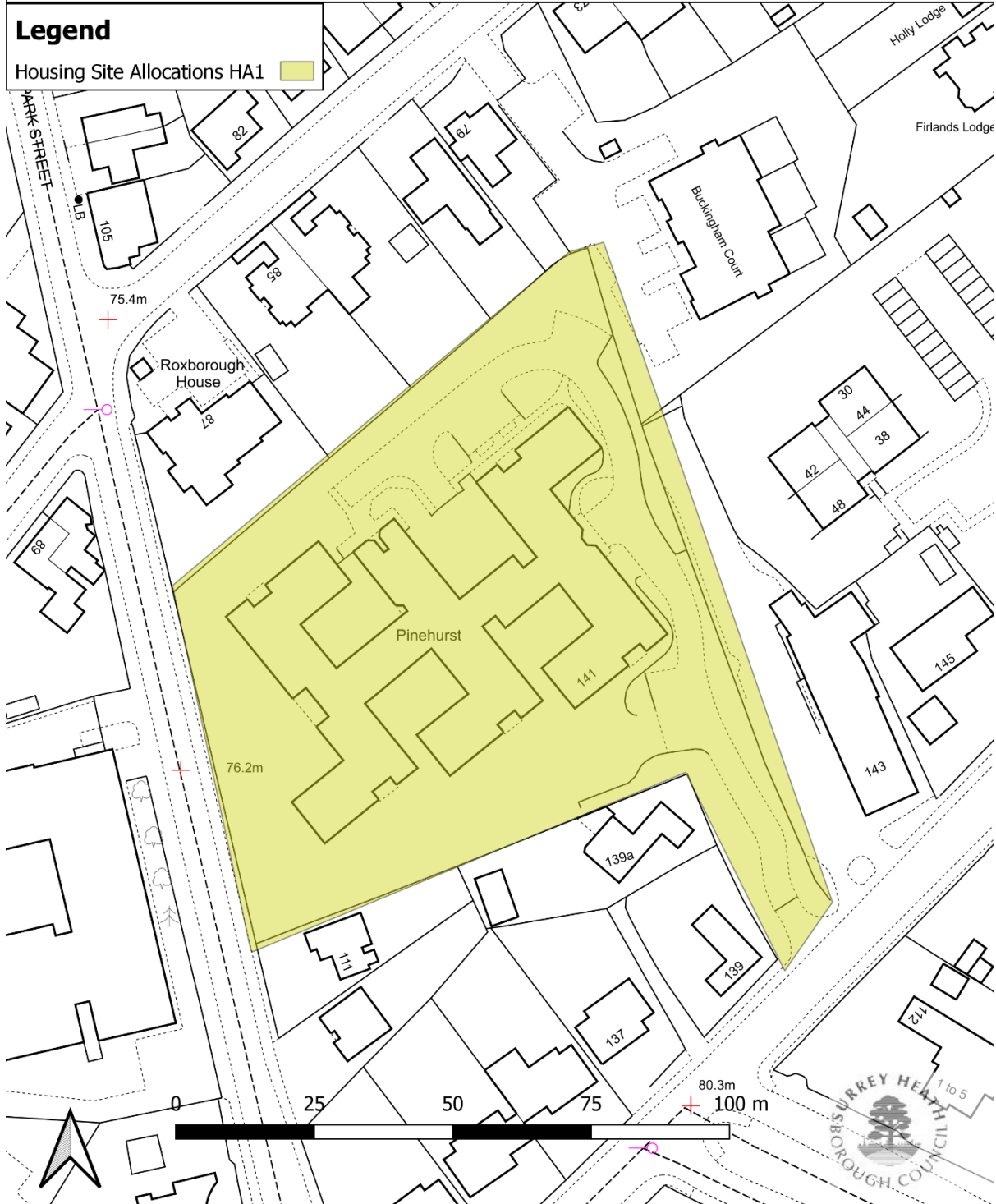
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Map 89.

Policy HA1/14 Pinehurst, 141 Park Road, Camberley **Not to Standard Scale**



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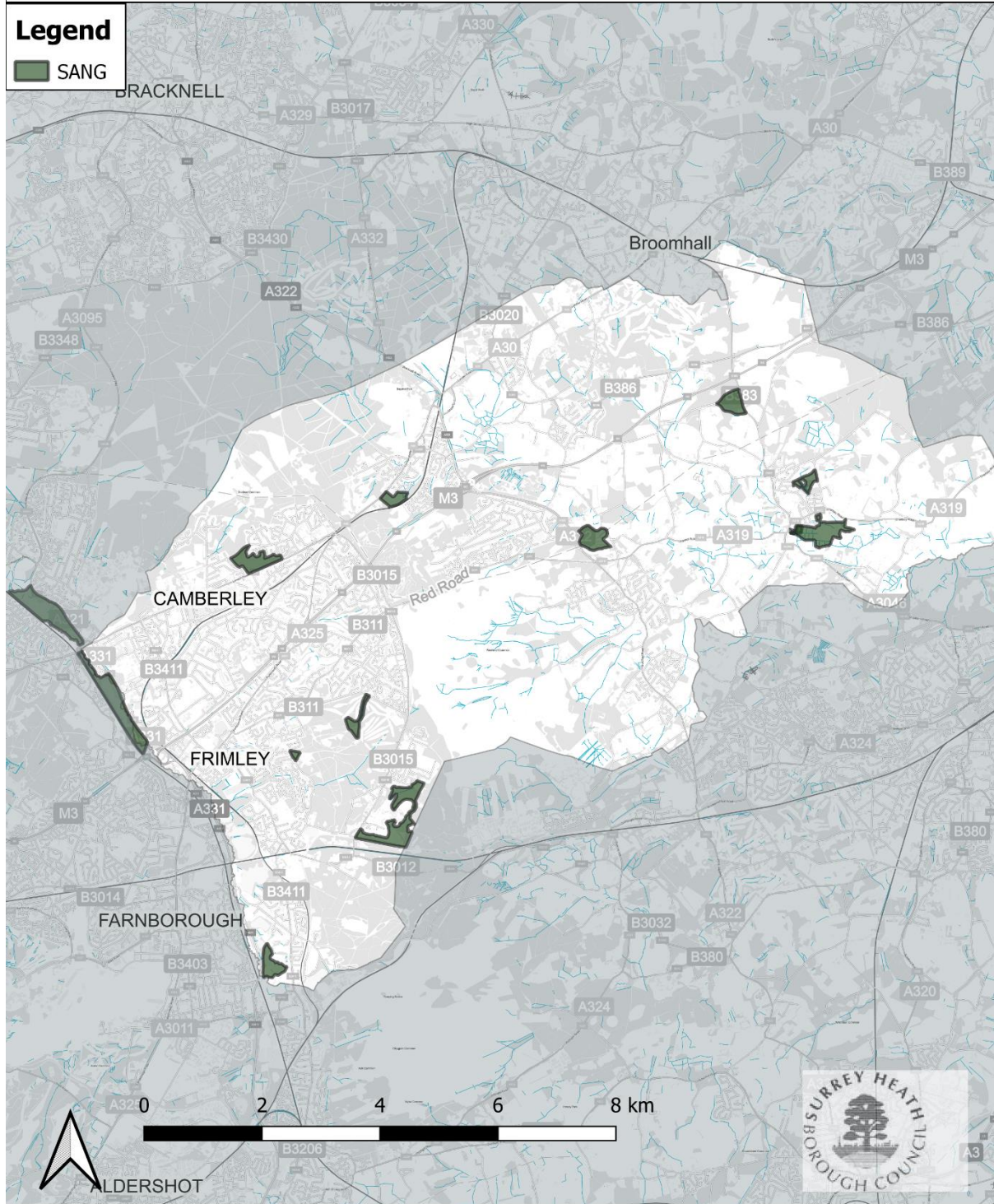
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Map 90.

Policy IN5 Green Infrastructure

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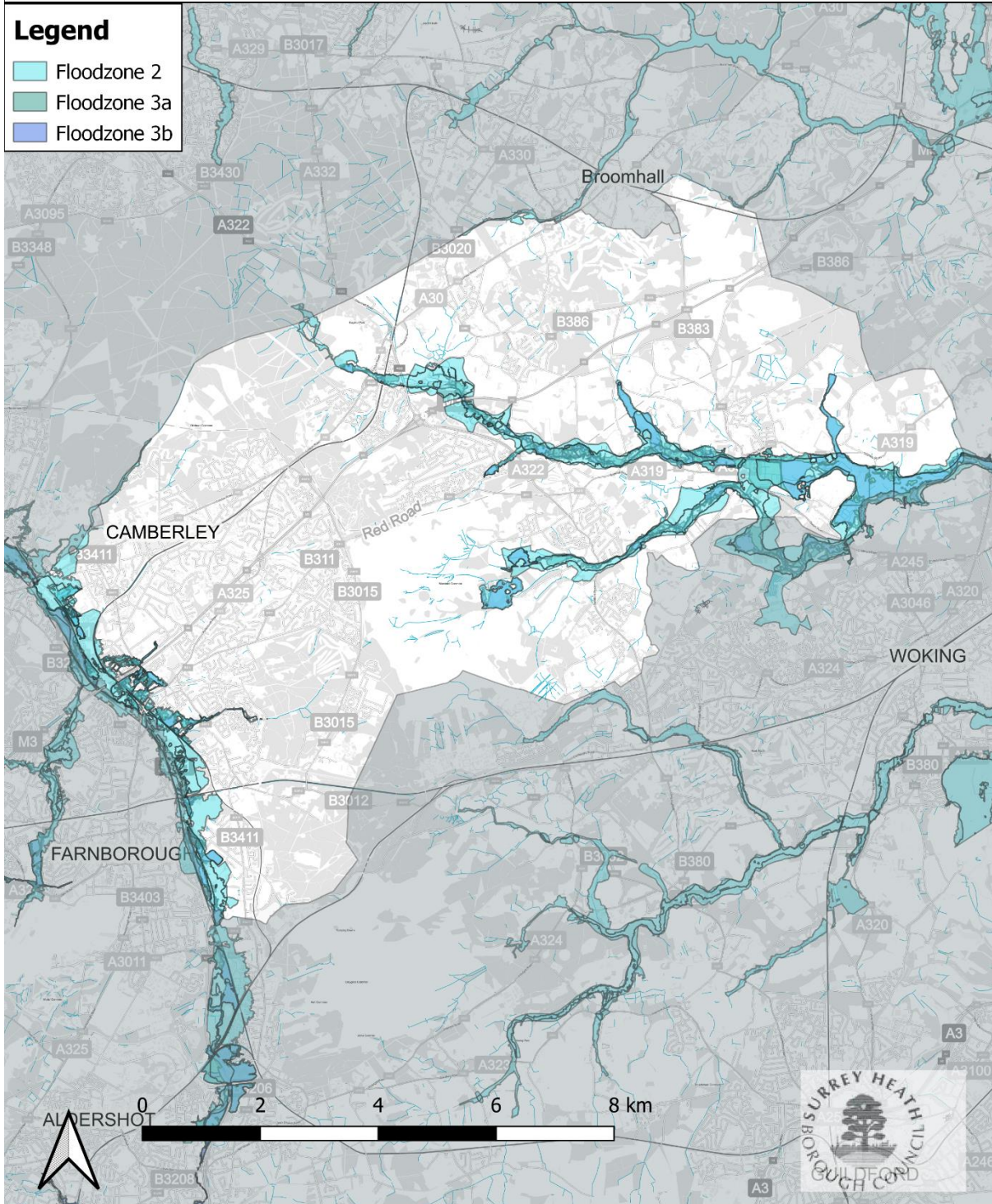
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Map 91.

Policy E6 Flood Risk and Sustainable Drainage Systems

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Map 92.

Policy H11/H12 Diamond Ridge Woods, Camberley

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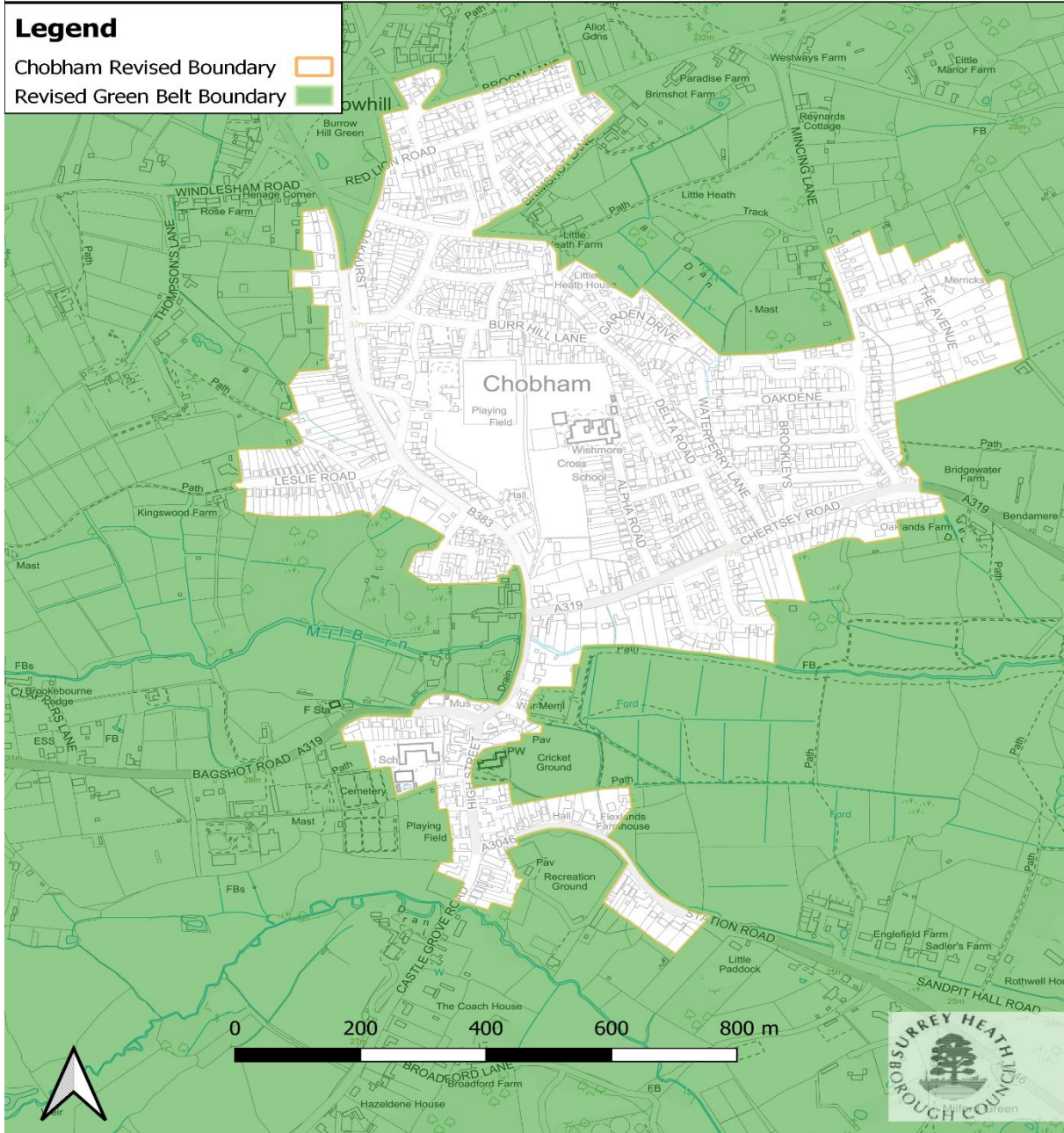
Map 93.

Policy SS1 Chobham Settlement Boundary Revision

Not to Standard Scale

Legend

- Chobham Revised Boundary 
- Revised Green Belt Boundary 



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Sustainability Appraisal (SA) of the Surrey Heath Local Plan

Interim SA Report
Non-technical Summary

Page 498

February 2022



Introduction

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

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

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

Central to the SA process is preparation of an SA Report for publication alongside the draft plan. At the current time, an early draft version of the Local Plan is published for consultation, under Regulation 18 of the Local Planning Regulations, and an 'Interim' SA Report is published alongside.

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

Structure of the Interim SA Report / this NTS

SA reporting essentially involves answering the following questions in turn:

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

- including in relation to 'reasonable alternatives'.

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

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

3) What happens **next**?

Each of these questions is answered in turn below. Firstly though there is a need to set the scene further by answering the question: *What's the scope of the SA?*

What's the scope of the SA?

The scope of the SA is reflected in a list of topics and objectives. Taken together, this list provides a methodological 'framework' for appraisal.

Table A: The SA framework

Topic	Objectives
Accessibility [to community infrastructure]	<ul style="list-style-type: none"> Improve opportunities for access to education, employment, recreation, health, community services and cultural opportunities for all sections of the community Sustain and enhance the viability and vitality of town, district and local centres Improve the education and skills of the local population Maintain and improve cultural, social and leisure provision
Air / env quality	<ul style="list-style-type: none"> Ensure air quality continues to improve in line with national and/or WHO global targets Reduce noise pollution
Biodiversity	<ul style="list-style-type: none"> Conserve and enhance the Borough's biodiversity Ensure the protection of the Special Protection Areas (SPAs)
Climate change adaptation	<ul style="list-style-type: none"> Minimise the risk of flooding Encourage reduced water consumption
Climate change mitigation	<ul style="list-style-type: none"> Reduce greenhouse gas emissions Increase energy efficiency and increase the use of renewable energy Encourage the use of more sustainable modes of transport (active and public) and reduce traffic congestion
Communities and health	<ul style="list-style-type: none"> Improve the population's health Improve the education and skills of the local population Reduce crime, fear of crime and social exclusion Encourage the enjoyment of the countryside, open spaces and local biodiversity Sustain and enhance the viability and vitality of town, district and local centres

Topic	Objectives
Economy and employment	<ul style="list-style-type: none"> Support inclusive and diverse economic growth Maintain stable levels of employment in the Borough Support existing business structure and businesses Sustain and enhance the viability and vitality of town, district and local centres
Heritage	<ul style="list-style-type: none"> Protect and where appropriate enhance the landscape, buildings, sites and features of archaeological, historical or architectural interest and their settings
Housing	<ul style="list-style-type: none"> Meet identified housing need
Landscape	<ul style="list-style-type: none"> Protect and where appropriate enhance the landscape, buildings, sites and features of archaeological, historical or architectural interest and their settings Maintain and enhance the quality of countryside, Green Belt and open space areas
Land, soils and resources	<ul style="list-style-type: none"> Make the best use of previously developed land (PDL) and existing buildings Reduce contamination and safeguard soil quality and quantity Reduce generation of waste and maximise re-use and recycling
Transport	<ul style="list-style-type: none"> Encourage the use of more sustainable modes of transport (public transport/cycling/ walking) and reduce traffic congestion
Water	<ul style="list-style-type: none"> Maintain and improve the quality of water resources Encourage reduced water consumption

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Plan-making / SA up to this point

An important element of the required SA process involves appraising ‘reasonable alternatives’ in time to inform development of the draft plan, and then publishing information on reasonable alternatives for consultation alongside the draft plan.

As such, Part 1 of the Interim SA Report explains how work was undertaken, over the period 2019 to 2022, to develop and appraise a reasonable range of “growth scenarios”, essentially in the form of alternative key diagrams.

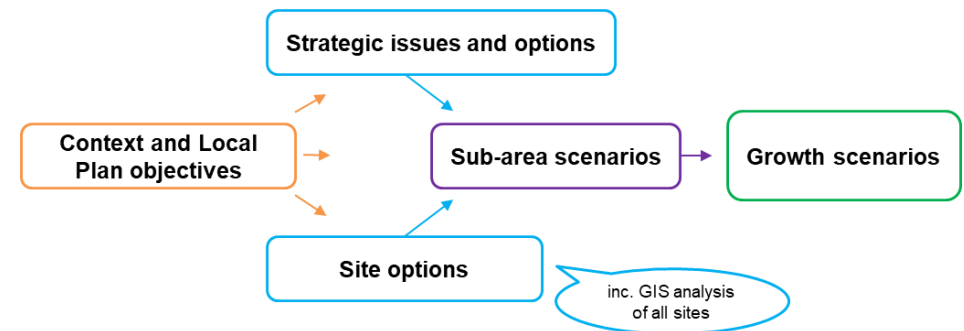
In short, the process involved:

- establishing growth scenarios;
- appraising growth scenarios; and then
- feeding-back to inform the preparation of the draft plan.

Establishing growth scenarios

The aim here is to explain the process of establishing reasonable growth scenarios for appraisal. Figure A provides an overview.

Figure A: Establishing growth scenarios – process overview



Context and Local Plan objectives

Plan-making has been underway since 2017, with one consultation having been held prior to this current consultation, and one Interim SA Report having been published.

Draft plan objectives were presented in the Issues and Options / Preferred Options consultation document in 2018, and then were subjected to minor adjustments. Plan objectives are presented in Section 1 of the current consultation document.

All evidence gathered to date, including through consultation and appraisal, fed into work to define reasonable growth scenarios for appraisal over the period 2019 to 2021.

Strategic issues and options

There is a need to consider:

- **Quanta** (*how much?*) – Surrey Heath Borough is in a somewhat unusual situation, in that the default option for the Local Plan is not to set the housing requirement at Local Housing Need (LHN), which is 327 dwellings per annum (dpa) (6,213 homes in total over the 19-year plan period), but rather an adjusted average housing need figure of 299 dpa (5,680 homes in total over the plan period). This is due to the adopted Hart Local Plan providing for unmet needs from Surrey Heath.

As such, reasonable growth scenarios should be primarily focused on providing for 299 dpa / 5,680 homes in total. Given the extent of Green Belt and SPA constraints there is also a clear strategic justification for exploring lower-growth scenarios, subject to detailed consideration of capacity/supply options, as discussed below.

With regard to higher growth scenarios, the constraints affecting Surrey Heath serve as a reason to suggest that these should be ruled out as unreasonable. However, on the other hand, the evidence on affordable housing needs serves as a reason for giving further consideration to the possibility of setting the housing requirement at a figure above 299 dpa. The matter of precise quanta figures to reflect across the reasonable growth scenarios is returned to below, subsequent to consideration of broad distribution options, site options and sub-area scenarios.

- **Broad distribution** (*where?*) – Section 5.2 of the main report presents a review of key evidence, in broad chronological order, beginning with a review of the Capacity Study prepared in 2018, which served as evidence to inform the Issues and Options / Preferred Options consultation document (2018) and, in turn, a decision that the Hart Local Plan should provide for unmet need from Surrey Heath.

Section 5.2 of the main report concludes by presenting a summary of key broad distribution issues/options to feed into work to define reasonable growth scenarios:

- There are clear arguments for directing housing growth to **Camberley town centre**, both from a perspective of reducing pressure on the Green Belt and countryside beyond the Green Belt (CBGB), but also from a perspective of realising town centre regeneration and decarbonisation opportunities.
- The second sequentially preferable location for growth is clearly the **wider urban area** in the west of the Borough and within the built-up areas of villages, because directing growth here will serve to reduce pressure on the Green Belt and CBGB. There are no ‘headline’ strategic growth-related opportunities, but local-level opportunities exist, for example in terms of improving walking/cycling connectivity.
- The third sequentially preferable location for growth, in accordance with national policy, is the **CBGB**, with a view to minimising pressure on the Green Belt. There is also a strategic opportunity, in that this part of the Borough is well-connected to the main urban area. However, on the other hand, there is a need to consider the value and sensitivity of the CBGB, both from an environmental perspective (most notably given proximity/links to the Thames Basin Heaths Special Protection Area, TBHSPA) and from a communities perspective, in that the countryside here will tend to be accessible or otherwise valued by residents of the western urban area. A high proportion of the CBGB is subject to ‘absolute’ constraint, in that it falls within the TBHSPA 400m buffer, and much of the land outside of the buffer is locally designated as a Site of Importance for Nature Conservation (SNCI).
- The least sequentially preferable broad location for growth in the Borough (aside from areas subject to absolute constraints) is the **Green Belt**. Green Belt release would require demonstration of exceptional circumstances, taking into account the degree to which the land in question makes a contribution to the defined Green Belt purposes and the need to promote “sustainable patterns of development” (NPPF para 142). When considering ‘sustainable patterns of development’ there can be the potential to take account of growth opportunities (e.g. provision of community infrastructure to meet a need; or supporting a district or local centre); however, the NPPF emphasises that: “*Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport.*” It is for these reasons, and also mindful of the stretching nature of the Borough’s (adjusted) LHN figure and limited potential supply from non-Green Belt locations, that the Council has undertaken detailed Green Belt Review work, which has included a focus on examining brownfield land options and also the relative transport connectivity of Green Belt sites / land parcels. The Green Belt / edge of Green Belt (Bagshot) settlements are subject to a range of

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

- Another broad locational consideration relates to the matter of concentrating growth at '**strategic**' sites versus dispersing growth across smaller sites, where strategic sites are those with capacity in the several hundreds or thousands of homes, and associated with economies of scale that enable delivery of a good mix of uses (also a good mix of homes in terms of type, size and tenure), potentially to include employment land, and/or support new or upgraded strategic infrastructure. Growth scenarios with a focus on one or more strategic sites can tend to be associated with a range of benefits, for example from a perspective of infrastructure capacity, place-making and decarbonisation; however, strategic sites also give rise to a range of issues, including delivery risk, e.g. because of required infrastructure. Strategic growth options in the Surrey Heath context are relatively limited (e.g. in comparison to nearby Wokingham Borough), aside from the opportunity within Camberley Town Centre. However, one new settlement option exists, in the form of Fairoaks Airport, which is discussed further below.
- Regardless of whether there is support for one or more strategic sites, there is a need to support **a mix of site types and a degree of dispersal** (mindful of the settlement hierarchy) in order to ensure a robust housing supply trajectory (thereby maintaining a five year housing land supply, as measured against the housing requirement) and meet very local housing needs (albeit these are unquantified).
- There is also a need to consider sites suited to meeting **wider needs**, including for employment land (informed by the Employment Land Technical Paper Update, as discussed above), Gypsy and Traveller and Travelling Show People pitches/plots and sites (informed by the Accommodation Assessment) and specialist housing (informed by the Housing Needs Assessment).

Site options

The primary mechanism for considering site options in isolation is the Strategic Land Availability Assessment (SLAA) led by SHBC Officers, which assessed a total of 113 sites identified through a Call for Sites and targeted correspondence with landowners (informed by a Countryside Capacity Study, which examined land parcels within the CBGB). Another important input was the range of past and ongoing detailed workstreams examining issues and options for Camberley Town Centre, which are feeding in not only to the SLAA and Local Plan, but also a forthcoming corporate Camberley Town Centre Strategy.

The SLAA places all (non-permitted) site options into one of three categories:

- Deliverable (able to deliver in the first five years of the plan period) – a total of 10 site options are identified as deliverable, with a total identified capacity of 295 homes.
- Developable (able to deliver in the latter years of the plan period) – a total of 44 site options are identified as deliverable, with a total identified capacity of 2,178 homes.
- Discounted – sites judged not to be deliverable or developable.

With regards to the deliverable and developable sites, there is *relatively* limited need to scrutinise the conclusions of the SLAA through the appraisal of reasonable growth scenarios. With regards to discounted sites, 28 of these are discounted on account of being located within the Green Belt, and these sites *do* warrant close scrutiny, mindful of the stretching nature of the 'quanta' options discussed above. All discounted Green Belt sites are discussed in Section 5.4 of the main report, with a view to identifying those that should be feature within reasonable growth scenarios. Just one of the discounted Green Belt sites has the potential to deliver a strategic scheme, namely Fairoaks Airport.

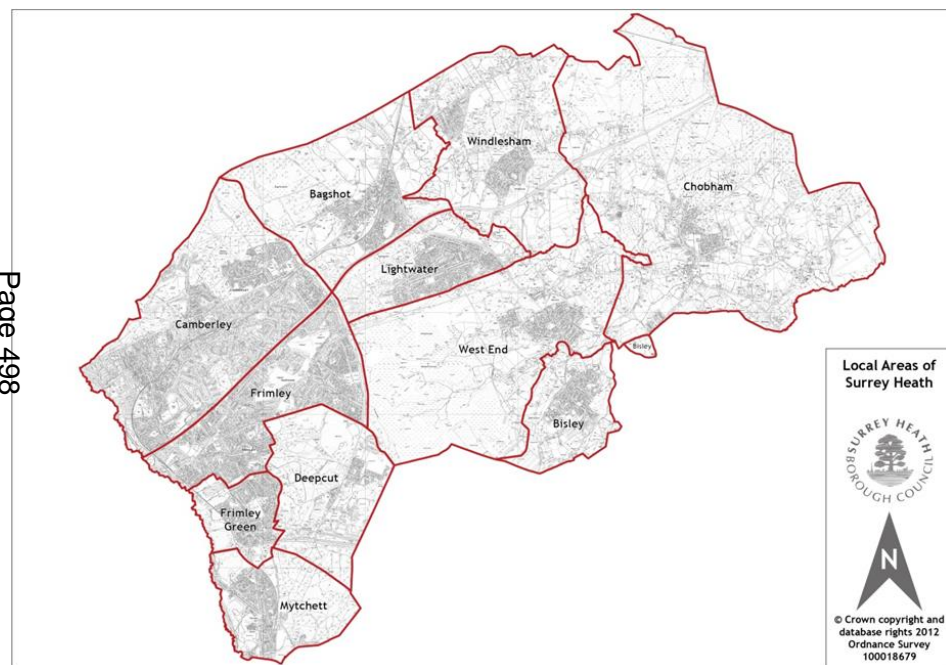
With regards to discounted sites outside of the Green Belt, these are discounted for clear cut planning reasons (e.g. availability; within the 400m TBHSPA buffer zone), such that they do not require detailed scrutiny. However, one such site warrants particular mention, namely Site 830 (Land at Pine Ridge Golf Course, Deepcut, or 'Pine Ridge'), because whilst it is currently unavailable, it *could potentially* (if made available and determined to be suitable for allocation) deliver a strategic urban extension to the main urban area.

Finally, as a means of providing supplementary evidence on site options, Appendix V of the main report presents the findings of an AECOM-led quantitative GIS-based exercise, involving examining the spatial relationship between all site options and a range of constraint/push (e.g. biodiversity designations) and opportunity/pull (e.g. schools) features for which data is available in digitally mapped form for the Borough as a whole. The limited nature of the analysis is such that it does not enable overall conclusions to be reached on the merits of each site (unlike the SLAA); however, it is nonetheless a useful input.

Sub-area scenarios

The next step was to draw upon understanding of strategic and site-specific issues and options to establish growth scenarios for each of the Borough's 12 sub-areas in turn. This is the focus of Section 5.4 within the main report. Specifically, consideration is given to the 11 areas shown in the figure below, plus Camberley town centre.

Figure B: Sub-areas within the borough



For each sub-area the aim was to arrive at a conclusion on the sub-area growth scenarios that should be taken forward to the final step in the overall process (as summarised in Figure A), which sees the sub-area growth scenarios combined into a single set of borough-wide growth scenarios. Ultimately, the conclusion was that:

- For seven sub-areas, namely those in the west of the Borough plus Lightwater, only one scenario needs to be reflected across the borough-wide growth scenarios (i.e. the approach to growth can reasonably be held constant), specifically one involving supply from all deliverable/developable SLAA sites. Section 5.4 reaches this conclusion 'on balance' for several areas, notably Camberley town centre, Deepcut and Mytchett.

- For four of the remaining five sub-areas there are two reasonable growth scenarios to reflect, specifically: 1) supply from all deliverable/developable SLAA sites; and 2) additional supply, over-and-above (1), from one or more small Green Belt sites.
- For Chobham there are three reasonable growth scenarios to reflect, specifically: 1) supply from all deliverable/developable SLAA sites; 2) additional supply, over-and-above (1), from one or more small Green Belt sites; and 3) additional supply, over-and-above (1), from Fair Oaks Airport, specifically, support for a Garden Village with a capacity of 'at least 1,500 homes', of which 1,000 would deliver in the plan period.

Table B: Reasonable sub-area scenarios

Sub-area	Number of homes in the plan period [Over-and-above completions, commitments and windfall]*			
	Scenario 1	Scenario 2 <i>Scenario 1 plus...</i>	Scenario 3 <i>Scenario 1 plus...</i>	
West of the Borough (plus Lightwater minus Bagshot)	Camberley centre	1,226	-	-
	Wider Camberley	265	-	-
	Deepcut	138	-	-
	Frimley	215	-	-
	Frimley Green	177	-	-
	Lightwater	17	-	-
	Mytchett	23	-	-
East of the Borough (plus Bagshot minus Lightwater)	Bagshot	134	~800 homes at some or all of the 18 Green Belt site options shortlisted in Section 5.4 of the main report.	-
	Bisley	32		-
	Chobham	114		1,000
	West End	96		-
	Windlesham	36		-
Total	2,473	Scenario 1 + ~800	Scenario 1 + 1,000	

* completions are sites already delivered since the start of the plan-period; commitments are sites with planning permission; windfall supply will come from sites that are not in the SLAA because they are not yet known of or are too small to be identified in the SLAA.

Growth scenarios for appraisal

The final task was to draw together the understanding generated in order to arrive at a single set of reasonable borough-wide growth scenarios for appraisal. In practice, this meant exploring ways of **combining the sub-area scenarios**, also mindful of housing supply from completions, commitments and windfall.

Total supply from completions, commitments and windfall is 3,609 homes, which is a figure ~2,070 homes short of the **5,680 homes** ‘adjusted housing need figure’ and the housing requirement figure that reasonable growth scenarios should be primarily focused on.

Additionally, there is a need to ensure a **supply buffer**, which means ensuring a total supply in excess of the requirement. As such, there is a need to primarily focus on combinations of sub area scenarios that would deliver *in excess of* 2,070 homes.

With regards to **lower growth** scenarios, as discussed, there is a strategic argument for exploring scenarios of this nature. However, having gone through a process of exploring site options and sub-area scenarios, the conclusion is that there is no reasonable need to define and appraise lower growth scenarios. The minimum number of homes achieved by combining the sub-area scenarios (2,473 homes) is comfortably in excess of 2,070.

With regards to **higher growth** scenarios, there is a strategic, or ‘top down’, argument for exploring scenarios of this nature and ‘bottom up’ work serves to confirm this argument.

The following bullet points explain the process of combining sub-area scenarios:

- The starting point is a borough-wide scenario comprising Scenario 1 for each sub-area. Total potential supply would be **6,082 homes** (3,609 + 2,473) , which is a figure 7% above the adjusted housing need figure (i.e. there would be a 7% ‘supply buffer’). This is borough-wide reasonable growth scenario 1.
- Reasonable growth scenario 2 is then naturally scenario 1 plus “~800 homes at some or all of the 18 Green Belt site options shortlisted in Section 5.4. of the main report”. Under this scenario the total potential supply would be 6,082 + 800 homes = **6,882 homes**, which is a figure 21% above the average adjusted housing need.
- Reasonable growth scenario 3 is then naturally scenario 1 plus additional allocation of Fairoaks Airport (or ‘Fairoaks’). Fairoaks is associated with a range of issues, but does include an element of PDL, and is being promoted as a Garden Village (GV). Total capacity of the site, on the basis of latest work completed by the site promoters, is “at least 1,500 homes”, but a safe assumption (given delivery risks and uncertainties) is that ~1,000 homes would come forward in the plan period. Therefore under this scenario the total potential supply in the plan period would be 6,082 + 1,000 homes = **7,082 homes**, which is a figure 25% above the average adjusted housing need figure.

The above discussion leads to three reasonable growth scenarios, which are presented in Table C and across the three subsequent maps. Final points to note are as follows:

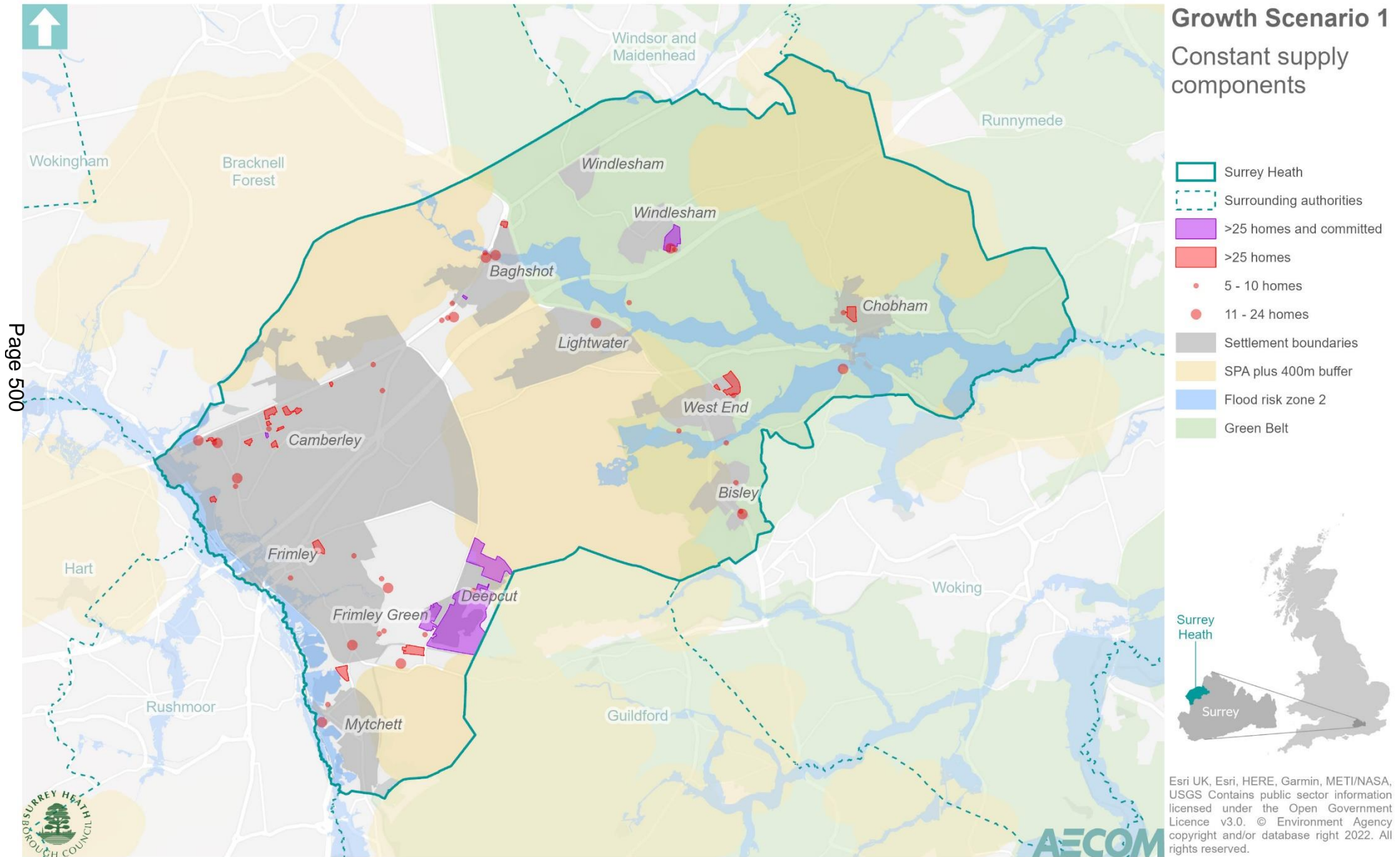
- It is important to be clear that Scenario 2 is defined without specifying precisely which Green Belt sites would be allocated and the precise capacity of each. This is a limitation, but is an unavoidable reflection of the stage of the plan making process.
- Under Scenarios 2 and 3 there is a question-mark regarding whether the housing requirement (i.e. the figure against which the Local Plan performance is monitored and evaluated) would be *as per* scenario 1, with a higher supply buffer, or whether the housing requirement would be increased (a ‘true’ higher growth strategy).

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

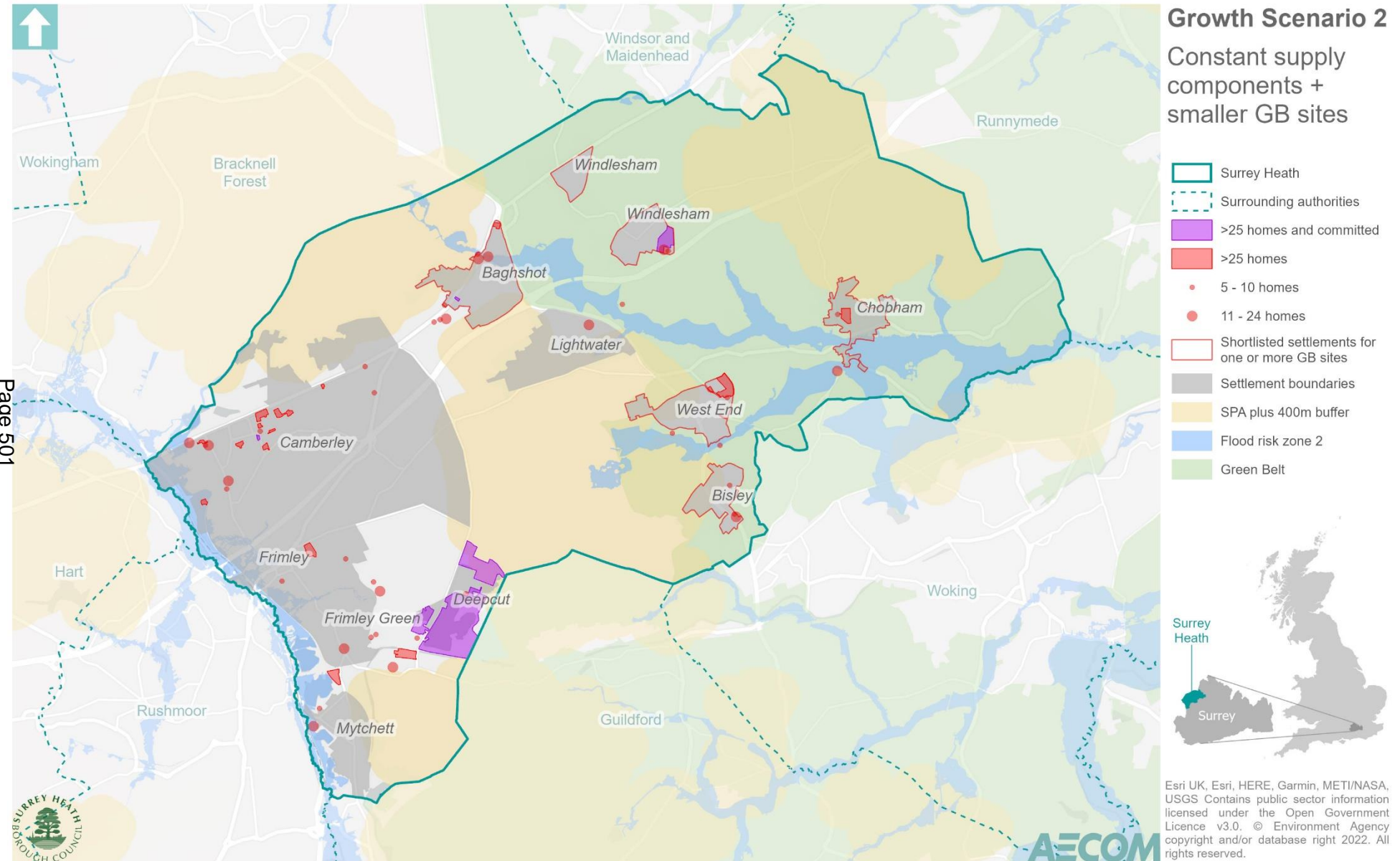
Supply component	Growth scenario 1 Constant supply components	Growth scenario 2 Constant supply components + smaller GB sites	Growth scenario 3 Constant supply components + Fairoaks GV
Completions & commitments	3,152	3,152	3,152
Windfall	457	457	457
SLAA sites	2,473	2,473	2,473
Smaller GB sites	-	800	-
Fairoaks GV	-	-	1,000
Total supply (2019-2038)	6,082	6,880	7,082
% above 299 dpa	7%	21%	25%

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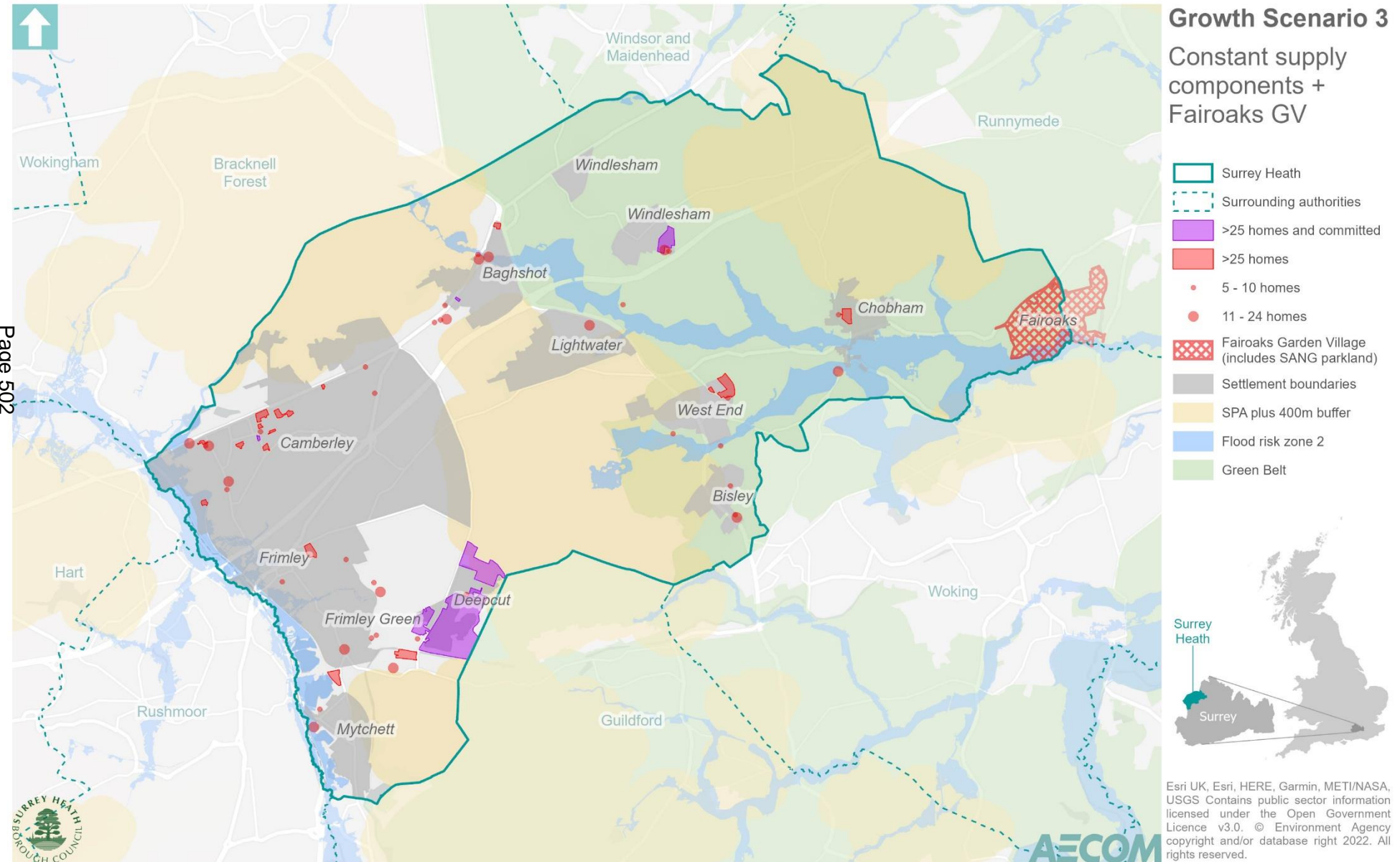
Reasonable growth scenario 1: Constant supply components (i.e. all sites identified as deliverable or developable by the SLAA)



Reasonable growth scenario 2: Scenario 1 plus ~800 homes at some or all of the 18 Green Belt site options shortlisted in Section 5.4. of the main report



Reasonable growth scenario 3: Scenario 1 plus Fairoaks Garden Village (at least 1,500 homes in total, with 1,000 assumed in the plan period)



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Growth scenarios appraisal

Summary appraisal findings are presented within the table below. Within each row (i.e. for each of the topics that comprise the SA framework) the columns to the right hand side seek to both rank the scenarios in order of performance and categorise the performance of each scenario in terms of 'significant effects' using red / amber / light green / green.

Growth scenarios appraisal findings

The appraisal highlights **Scenario 1** as performing best in terms of the greatest number of topics and as being associated with the fewest predicted negative effects. However, it does not necessarily follow that Scenario 1 is best performing or 'most sustainable' overall, because the appraisal is undertaken without any assumptions made regarding the weight, or degree of importance in the decision-making process, that should be assigned to each of the topics, nor is it safe to assume that each is of equal importance. There are a range of issues and impacts associated with Scenario 1 – both in respect of topics where the appraisal matrix flags an 'amber' and in respect of other topics, where the overall conclusion is neutral or positive - which are explored further in the Draft Plan appraisal.

With regards to **Scenario 2**, the appraisal finds this scenario to perform relatively poorly in terms of all sustainability topics, which is a strong indication of poor performance overall.

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

Finally, with regards to **Scenario 3**, the appraisal highlights a mixed picture, with this scenario preferable to Scenario 1 from a 'housing' and a 'communities' perspective, given affordable housing needs and a clear place-making opportunity (also, there are arguments in favour of Scenario 3 from an 'economy and employment perspective), but giving rise to concerns over-and-above Scenario 1 in several other respects. Strategic growth locations can give rise to considerable opportunities to realise sustainability objectives, over-and-above piecemeal expansion of settlements. However, the proposed garden village is relatively small in scale, and there are a range of locational issues and constraints. There might feasibly be potential to address the locational challenges, but there would be costs and trade-offs involved, which would need to be fully explored.

	Growth scenario 1 Constants only	Growth scenario 2 Constants + Small GB sites	Growth scenario 3 Constants + Fairoaks
SA topic	Rank of preference and categorisation of effects		
Accessibility	★1	3	2
Air quality	★1	2	2
Biodiversity	★1	2	2
CC adaptation	★1	2	★1
CC mitigation	★1	3	2
Communities	2	3	★1
Economy and employment	★1	3	★1
Historic environment	★1	3	2
Housing	3	2	★1
Land, soils, resources	★1	2	★1
Landscape	★1	3	2
Transport	★1	2	2
Water	★1	2	★1

The preferred growth scenario

It is not the role of the appraisal to arrive at a conclusion on which of the reasonable growth scenarios is best, or ‘most sustainable’ overall. Rather, it is the role of the plan-making authority to arrive at that conclusion, informed by the appraisal. The following statement explains SHBC Officers’ reasons for supporting **Growth Scenario 1**:

The appraisal shows Scenario 1 to perform well in a number of respects, ranking highest or equally highest for the majority of SA topics, specifically: Accessibility; Air Quality; Biodiversity; Climate change adaptation and mitigation; Economy and employment; Historic environment; Land, soils and resources; Landscape; Transport and Water.

Whilst Scenario 3 does rank higher than Scenario 1 in terms of two of the SA topics (Communities and Housing), it performs poorly, relative to Scenario 1, in several respects, most notably Biodiversity, Landscape and Transport. Scenario 2 ranks below Scenario 1 under all topics other than Housing.

In summary, Scenario 1 is justified because it has no predicted significant negative effect for any SA topic, stands out as performing relatively well in a number of respects and is predicted to give rise to fewest negative effects. It is not possible to identify an alternative strategy that would perform better overall.

The primary issue in terms of which the alternatives perform better is Housing, however, the appraisal nonetheless predicts a ‘significant positive effect’ for Scenario 1 because the Borough’s assigned Local Housing Need (LHN) figure would be met, after having accounted for an element of supply via the adopted Hart Local Plan. It is recognised that there are issues and challenges around meeting affordable housing needs under Scenario 1, which will be explored through and subsequent to the current consultation, including through a whole plan viability study. It is also recognised that Scenario 1 is not without its issues and challenges more widely, as highlighted through the growth scenarios appraisal, and explored further in the Draft Plan (Section 9 of the main report, and summarised below). The current Local Plan consultation document seeks to respond to growth-related issues and challenges through thematic and site-specific policies.

SA findings at this stage

Part 2 of the Interim SA Report answers the question “what are appraisal findings at this stage” by presenting an appraisal of the Draft Local Plan. The following is a summary.

Accessibility

The reconfiguration and regeneration of Camberley town centre represents a considerable opportunity to maintain and enhance the town centre’s community function, ensuring that it retains its role as the primary community infrastructure hub within the Borough, is an attractive place to visit and spend time and is easily permeable and navigable on foot. All five town centre allocations represent important components of the overall strategy (albeit one of these is already committed, namely 84-100 Park Street), in particular the two largest allocations, namely London Road Block (which will see an underused site in a town centre core location become a new central focus of the centre) and Knoll Road (which is at the edge of the town centre, and currently comprises a range of uses). Elsewhere there are limited community infrastructure opportunities set to be realised through the proposed growth strategy, and a further consideration is the proposal is to support housing growth at several small sites not linked to settlement boundaries, and hence in less accessible locations, although these sites together comprise only a small element of the overall strategy. With regards to site specific policies, there is a clear focus on use mix and realising opportunities for increasing pedestrian permeability and improving offsite walking/cycling links, which is supported. With regards to borough-wide thematic development management policies, numerous policies are supportive of accessibility objectives, with Policy CTC1 (Camberley Town Centre) considered to be particularly important. Overall, **positive effects of limited or uncertain significance** are predicted. It is worth highlighting that benefits will largely be felt in the long term, given the time that the town centre sites will take to come forward, hence it will be important to maintain a focus on ‘easy win’ opportunities for supporting the town centre in the shorter term.

Air and wider environmental quality

Ahead of transport modelling it is not possible to confirm whether or not the proposed growth strategy will lead to increased traffic through a known air pollution hotspot (which principally means an AQMA). However, early indications are that issues/impacts are limited, mindful that many areas experiencing problematic air pollution are set to see an improving situation over the plan period – all other things being equal – due to the national switch-over to electric vehicles (although issues with particulates will remain, including from brake, tyre and road wear, mindful of heavier EVs).

Regardless, there is a need to carefully consider proposed allocations in proximity to the M3 (just one small site for 9 homes), busy a-roads and/or the railway lines, both from an air quality and a noise/vibrations perspective. With regards to site-specific policies, there is a requirement to consider noise impacts where necessary, although there could be the potential for further detail, e.g. specifying parts of the site that should be left undeveloped. With regards to borough-wide development management policy, in addition to the pollution focused policy (Policy E4), policy for Camberley town centre is of note, including for supporting 20 minute neighbourhood principles. Overall, whilst there are certain tensions with air/noise pollution objectives, **neutral effects** from a borough-wide perspective.

Biodiversity

There are some concerns with several sites, including sites in proximity to the internationally important TBHSPA (albeit outside the 400m buffer), the nationally important Basingstoke Canal SSSI and locally important Sites of Nature Conservation Importance, SNCIs, and a number of sites intersect non-designated woodland or contain extensive mature trees. It is recognised that there are also a number of site specific opportunities, particularly in respect of urban greening, and that borough-wide thematic and site-specific policy is proposed to avoid and mitigate negative effects, and the proposal is to secure significant biodiversity net gain. However, at this stage in the plan-making process, it is appropriate to flag **a negative effect with limited or uncertain significance** noting the inherent sensitivity of the Borough. A recommendation is made in respect of one SLAA site at Deepcut for 21 homes that may warrant a formal allocation and site-specific policy, despite falling below the 25 homes threshold that triggers a Local Plan policy, to reflect sensitivities. The views of biodiversity focused organisations, including Natural England, the Wildlife Trust and the Woodland Trust, will be sought through the current consultation and considered ahead of plan finalisation, to ensure that the Local Plan growth strategy both minimises negative impacts on biodiversity and realises strategic opportunities as far as possible, ahead of a Local Nature Recovery Strategy (a requirement under the Environment Act) for Surrey or another geography covering the Borough.

Climate change adaptation

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

Climate change mitigation

Focusing on minimising per capita built environment emissions it is clear that the proposed strategy for growth and regeneration within Camberley town centre represents a major opportunity, and site specific policy is proposed to ensure that the opportunity is realised, although there could be the potential for further work leading to added policy detail, as opposed to deferring work to the development management stage, when it can transpire that options are more limited. With regards to the wider package of identified sites, all are modest in scale such that there is little reason to suggest any particular opportunity, in respect of built environment decarbonisation, although the decarbonisation focused policies – SS3a, E5 and DH8 – will apply. In conclusion, having taken account of proposed borough-wide thematic and site-specific policy, **neutral effects** are predicted. There will be a need for further scrutiny, both through and subsequent to the current consultation, to ensure that every effort is being made to minimise per capita greenhouse gas emissions, including through spatial strategy and site selection.

Communities

The regeneration of Camberley town centre represents a significant place-making opportunity, including the creation of two new residential quarters and support for new, relocated/upgraded and more accessible community facilities. Proposed site-specific policy for the four town centre allocations is strongly focused on design and wider matters relating to place-making; however, there is a degree of variation across the other proposed allocations, in respect of the degree of focus on these matters. The proposed site specific policy for Chobham Rugby Club (91 homes) appears strong. Other sites are not assigned a site-specific policy, and as small sites will be associated with more limited place-making opportunity, but will need to adhere to borough-wide policies including Policy DH1 (Design Principles). Overall, **positive effects of limited / uncertain significance** are predicted.

Economy

There is limited support for new employment land, and some allocations that would see change of use from employment to residential, but the proposed strategy is understood to align with objectively assessed needs for employment land and sub-regional strategy established by the Local Enterprise Partnership (LEP), hence it is fair to predict **positive effects of limited or uncertain significance**. Aside from the proposed growth strategy, borough-wide thematic policies are strongly supported in that the effect will be to ensure that existing employment land and town / district / local centres are given appropriate protection against change of use to residential, as far as is possible in the context of permitted development rights.

Historic Environment

A number of sites are associated with a degree of historic environment sensitivity, but this is largely unavoidable, and borough-wide thematic and site specific policy is proposed to ensure that necessary steps are taken to avoid and mitigate negative effects and potentially realise benefits. Matters for further consideration, taking account of the consultation responses received from Historic England and other organisations with an interest in the Historic Environment, potentially include: the setting of the Basingstoke Canal Conservation Area (also accessibility and appreciation); the grade 2 listed farmhouse east of West End; and the cluster of small sites south of Bagshot. **Neutral effects** are predicted at this current stage.

Housing

The Local Plan is predicted to result in **significant positive effects** given a proposed land supply sufficient to meet objectively assessed need, once account is taken of unmet need provided for through the adopted Hart Local Plan. There is also broad support for the distribution and mix of sites (both allocations and smaller sites in the SLAA), from a housing perspective. There are some challenges with the delivery of affordable housing and these will need to be explored through the whole plan viability assessment. Other key considerations relate to Gypsy, Traveller and Travelling Showpeople accommodation needs (there is a need for further work in this respect) and specialist accommodation (the SLAA supports six sites to deliver older persons accommodation).

Land, soils and resources

The plan performs well notably well from a perspective of making good use of previously developed land and avoiding loss of best and most versatile agricultural land. However, several sites are greenfield comprising woodland/forestry or the grounds/ curtilage/ gardens of existing homes in large plots. Overall, **neutral effects** are predicted.

Landscape

The proposal to maintain the current extent of the Green Belt, bar the inseting of Chobham village (see discussion in Appendix IV of the main report) is supported from a landscape perspective. The corollary is a need to focus growth in the CBGB, and the outcome is a need to support certain sites that potentially give rise to a degree of tension with landscape objectives, notably at Mytchett, Bagshot and Deepcut. However, it is difficult to predict impacts of any significance, given that the landscapes in question are not known to be particularly sensitive, and also given the potential to avoid and mitigate impacts through site layout, landscaping and design. Overall, **neutral effects** are predicted.

Transportation

The proposed strategy reflects the hierarchy of settlements with a particular focus on Camberley town centre, which leads to strong performance in transport terms. Also, there is a clear focus within site specific policy on taking targeted steps to ensure permeability within and through sites and improving walking and cycling links within the main urban area. Transport/traffic modelling is required to assess the capacity of roads and junctions to accommodate the increased traffic that will result from growth, and there is also a need for further work to confirm the potential for safe access to be achieved at certain sites. Overall, **positive effects of limited or uncertain significance** are predicted.

Water

It is appropriate to flag **negative effects of limited or uncertain significance** ahead of formal consultation with the statutory providers, including in respect of WwTW capacity at Camberley, and the Environment Agency may also wish to comment further on requirements in respect of SuDS, both site specific and borough-wide.

Overall conclusions on the Draft Local Plan

In conclusion, the appraisal predicts:

- **significant positive effects** in respect of housing objectives;
- **moderate or uncertain positive effects** in respect of accessibility, communities, 'economy and employment' and transport objectives;
- **neutral effects** in respect of air quality, climate change mitigation, historic environment, 'land, soils and resources' and landscape objectives; and
- **notable tensions / risk of negative effects** in terms of biodiversity, climate change adaptation and water objectives.

Significant negative effects are not predicted under any of the topic headings.

Impacts and wider issues / opportunities discussed within this appraisal will be taken into account prior to plan finalisation. A number of specific recommendations are also made within Section 9 of the main report, which will be given consideration, including around the possibility of additional site specific policy.

Cumulative effects

The SEA Regulations, which underpin the SA process, indicate that stand-alone consideration should be given to 'cumulative effects', i.e. effects of the Local Plan in combination with other plans, programmes and projects that can be reasonably foreseen. In practice, this is an opportunity to discuss potential 'larger than local' effects. The following bullet points cover some key considerations:

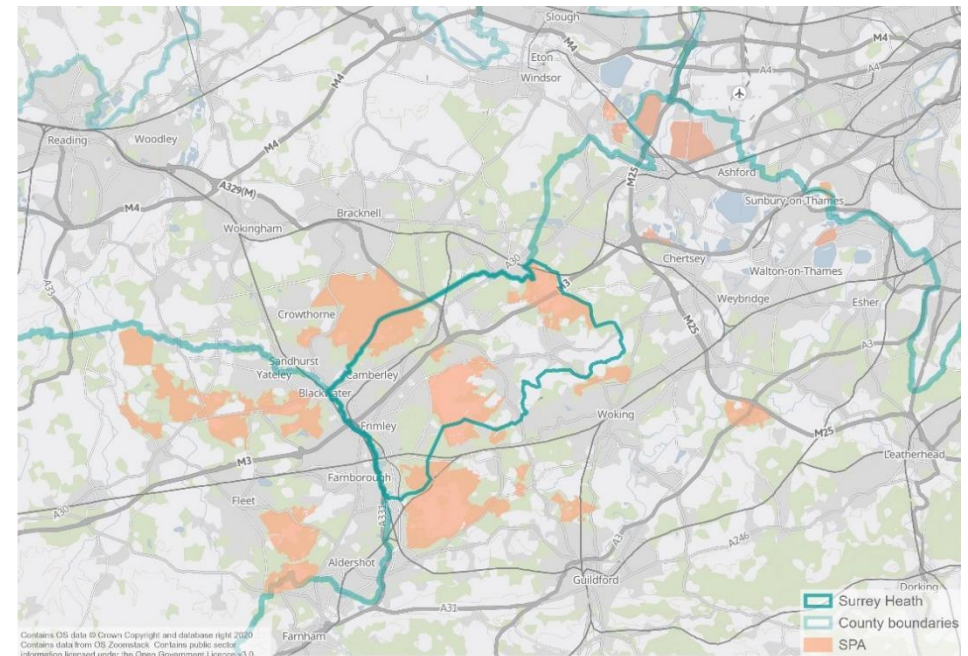
- **Housing needs** – the proposed strategy involves unmet needs from Surrey Heath provided for within Hart District, and does not make any provision for the risk of unmet needs arising from elsewhere in the sub-region. However, this is an appropriate strategy because: A) the matter of unmet needs provision in Hart is agreed and set out in an adopted Local Plan, such that it does not need to be revisited at the current time; and B) the environmental constraints affecting Surrey Heath mean that the Borough is not suited to providing for unmet needs from Woking or elsewhere in Surrey, plus there is a need to recognise that Surrey Heath shares a housing market area with the North East Hampshire / Blackwater Valley authorities to the southwest (from where there is little or no risk of unmet needs arising). Work has been undertaken to appraise higher growth scenarios (as discussed above), but only because of the need to explore the possibility of providing for locally arising affordable housing needs more fully and/or providing for a larger 'supply buffer' over-and-above the housing requirement.

The economy – the proposed strategy makes limited provision for new employment land, and does support the redevelopment of several employment sites for residential, primarily in the Camberley/Frimley urban area, and most notably Sir William Siemens Square. The primary 'larger-than-local' consideration is the need to support the economy of the Blackwater Valley, and regeneration of Camberley town centre is supported in this respect, as is the proposed protection for strategic employment sites; however, there is a degree of uncertainty/risk ahead of transport modelling. The views of the Enterprise M3 LEP are sought through the current consultation.

- **MOD operations** – this is a clear 'larger-than-local' consideration. The appraisal does not highlight any issues or risks, but the views of the MOD are sought through the current consultation.
- **Transport corridors** – the appraisal does not highlight any major growth-related issues or opportunities, but there will be a need to revisit matters subsequent to the current consultation, in light of modelling and responses received key stakeholder organisations including National Highways, Transport for the South East and both Surrey and Hampshire county councils. Key corridors include those road corridors that link Woking to the M3 and M25, the M3 itself and the regionally important A331.

- **Thames Basin Heath SPA** – the matter of in-combination impacts to the SPA is a focus of a stand-alone Habitats Regulations Assessment (HRA), noting that eleven authorities manage the SPA in partnership. Key considerations include management of Horsell Common in collaboration with Woking Borough, and Chobham Common in collaboration with Runnymede District and RB Windsor and Maidenhead.
- **Landscape scale nature recovery** – there is a need to focus efforts on achieving conservation and 'net gain' objectives, in respect of biodiversity and wider natural capital and ecosystem services, at functional landscape scales, including landscape character areas and river corridors. A Local Nature Recovery Strategy (LNRS) will be forthcoming, under the Environment Act, but steps must be taken in the interim. Aside from matters relating to the TBHSPA and its associated heathland and former heathland landscapes, a primary consideration is potentially realisation of opportunities along the Blackwater Valley corridor in collaboration with Rushmoor Borough and Guildford Borough and other partner organisations. Views on constraints and growth-related opportunities are sought from biodiversity, nature-recovery and natural capital-focused organisations including Surrey Nature Partnership.

Surrey Heath within Surrey but linking closely to Berkshire and Hampshire



Next Steps

Publication of the Proposed Submission Local Plan

Subsequent to the current consultation it is the intention to prepare the proposed submission version of the Local Plan for publication in-line with Regulation 19 of the Local Planning Regulations 2012. The Proposed Submission Local Plan will be that which the Council believes is 'sound' and intends to submit for Examination. Preparation of the Proposed Submission Local Plan will be informed by the findings of this Interim SA Report, responses to the current consultation and additional evidence / appraisal work.

The SA Report will be published alongside the Proposed Submission Local Plan. It will provide all the information required by the SEA Regulations 2004.

Submission, examination and adoption

Once the period for representations on the Proposed Submission Local Plan / SA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether the LPU can still be deemed 'sound'. If this is the case, the Local Plan will be submitted for Examination, alongside a statement setting out the main issues raised during the consultation. The Council will also submit the SA Report.

At Examination the Inspector(s) will consider representations (alongside the SA Report) before then either reporting back on soundness or identifying the need for modifications. Modifications to the Local Plan will be prepared (alongside SA if necessary) and then subjected to consultation (with an SA Report Addendum published alongside if necessary).

Once found to be 'sound' the Local Plan will be formally adopted by the Council. At the time of adoption a 'Statement' must be published that sets out (amongst other things) 'the measures decided concerning monitoring'.

Monitoring

In-light of the appraisal monitoring efforts might focus on:

- Agricultural land – it is possible to monitor loss of agricultural land by grade.
- Air quality – the Council might review how air quality monitoring efforts are targeted in light of the Local Plan, including with a view to identifying problem areas outside of formally designated AQMAs, including potentially ecology-related.
- Biodiversity – there will be a need to develop a framework for ensuring that individual developments deliver biodiversity net gain in combination at landscape scales.

- Climate change adaptation –potentially monitor housing in close proximity to a fluvial flood zone (in addition to intersecting); also the 1 in 30 yr surface water flood zone.
- Climate change mitigation – there is a need to carefully consider how Local Plan monitoring links to wider monitoring of borough-wide emissions. On a specific point, it could be appropriate to monitor the proportion of new homes linked to a heat network (e.g. district-level); also the proportion of homes delivered to standards of sustainable design and construction that exceed building regulations.
- Employment land requirements – will require close monitoring, given that the current employment land evidence bases is now nearly two years old, and the regional and national economic context and baseline situation has evolved since that time.
- Housing – the Council already monitors numerous housing delivery related matters through the Authority Monitoring Report, and indicators should be kept under review.
- Transport – in Camberley town centre there will be merit to monitoring the travel behaviours of residents in detail, in order to test the hypothesis that per capita emissions from transport can be minimised at major growth locations.
- Water – ongoing consideration should be given to any risk of capacity breaches at WwTWs and other risks to the status of water courses.

Birds eye view of Camberley town centre



Sustainability Appraisal (SA) of the Surrey Heath Local Plan

Interim SA Report

February 2022

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1 Introduction

1.1 Background

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

1.2 SA explained

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

1.3 This Interim SA Report²

- 1.3.1 At this current stage of the plan-making process the Council is consulting on an early draft version of the Local Plan under Regulation 18 of the Local Planning Regulations.
- 1.3.2 This report is published with the intention of informing the consultation and subsequent preparation of the final draft ('proposed submission') version of the plan.

Structure of this report

- 1.3.3 Despite the fact that this is an 'Interim' SA Report, and does not need to provide the information required of the SA Report, it is nonetheless helpful to structure this report according to the **three questions** above.
- 1.3.4 Before answering the first question, there is a need to further set the scene by setting out:
- the plan's aims and objectives; and
 - the scope of the SA.

Commenting on this report

- 1.3.5 This report can be referenced as part of comments on the draft plan and/or comments can be made specifically on any part of this report. Further guidance is provided below, including the next steps section.

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

² See **Appendix I** for further explanation of the regulatory basis for answering certain questions within the SA Report, and a 'checklist' explaining more precisely the regulatory basis for presenting certain information.

2 Plan aims and objectives

2.1 Introduction

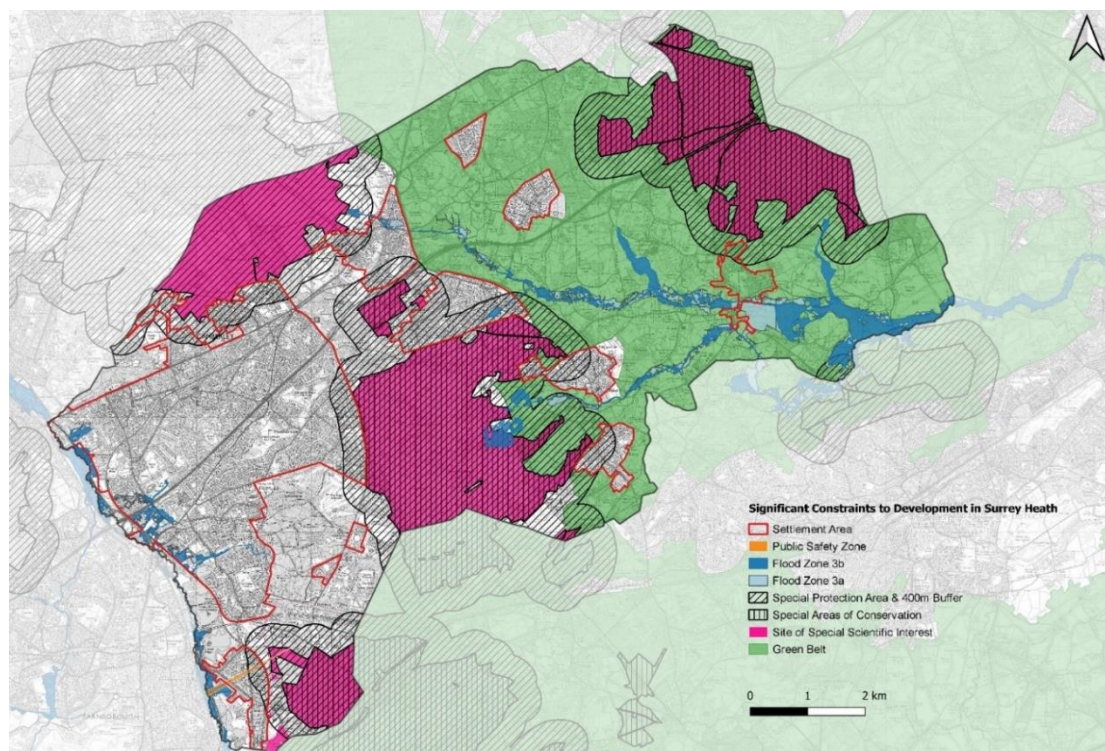
2.1.1 The aim here is to briefly introduce: the plan area (drawing text from the plan document, and mindful that spatial issues and opportunities are discussed in more detail elsewhere in this report); the legislative and policy context; and the objectives that are in place to guide plan preparation (the 'plan scope').

2.2 The plan area

2.2.1 Surrey Heath lies in the north west corner of Surrey and adjoins the counties of Berkshire and Hampshire. The north and east of the Borough are mainly areas of countryside and heathland which give the Borough its name. The Borough is relatively small, with an estimated population of 89,200 in 2020.

2.2.2 The London Metropolitan Green Belt stretches across the eastern half of the Borough, as far west as Bagshot, Lightwater and the component of the Thames Basin Heath Special Protection Area (TBHSPA) / MOD land / former common land that heavily constrains land to the east of the main urban area. The great majority of the western half of the Borough is either built-up or constrained by the TBHSPA, with only a relatively small area of Countryside Beyond the Green Belt (CBGB) falling outside of the TBHSPA 400m buffer zone, and much of this land is locally designate as a Site of Nature Conservation Importance (SNCI) and/or constrained by historic environment designations (Bagshot Park and Royal Military College).

Figure 2.1: Green Belt and headline environmental constraints



2.2.3 The western half of the Borough contains the Camberley / Frimley / Frimley Green urban area and the villages of Bagshot, Deepcut and Mytchett. The eastern half of the Borough is more rural, and includes the villages of Bisley, Chobham, Lightwater, West End and Windlesham. Bisley, West End and Windlesham are currently inset from the Green Belt.

2.2.4 The Borough lies within the Enterprise M3 Local Enterprise Partnership (EM3 LEP) area which stretches from the New Forest in the south to the perimeter of Heathrow Airport in the north. Camberley is the key population, retail, commercial and employment centre in the Borough and is identified as a 'step-up town' within the Strategic Economic Plan for the LEP area, i.e. as a town with economic potential experiencing current barriers to economic growth. Recent work on a Local Industrial Strategy for the LEP has identified both Camberley and Frimley as having an important role as population and employment centres.

- 2.2.5 Surrey Heath also lies within the Blackwater Valley, comprising authorities from parts of Berkshire, Hampshire, and Surrey based along the A331 Blackwater Valley Road and River Blackwater. There are important economic and functional relationships between the main urban settlements which together form the Blackwater Valley area and Camberley is one of the largest towns in the Valley.
- 2.2.6 The Borough also lies within a Housing Market Area (HMA) and Functional Economic Area (FEA) with Hart District and Rushmoor Borough.³ Major towns around the Borough include Bracknell to the north (well connected to Surrey Heath by road), Woking to the east (closely linked to Surrey Heath), Guildford to the south east (well linked by rail), Aldershot and the Blackwater Valley settlements to the south (closely linked), Basingstoke to the west (via the M3) and Reading to the north west (well linked by rail).
- 2.2.7 The majority of employment floorspace is located in Camberley and Frimley at three large business parks and five industrial estates. There are also four single occupancy sites that are home to major businesses; one located in Frimley, one near Mytchett, and two near the rural settlement of Windlesham. Fairoaks Airport in Chobham also provides employment use within the local area.
- 2.2.8 Good access to key employment areas, including Farnborough, Reading, Heathrow and London, means that the Borough sees net out-commuting. Surrey Heath is served by three rail stations at Bagshot, Camberley and Frimley with trains operating on a branch line service between Ascot and Guildford. All three stations have poor access to London Waterloo. Many commuters living in Surrey Heath therefore use nearby faster services from stations outside the Borough at Farnborough, Woking and Sunningdale.
- 2.2.9 As well as employment, Camberley is also the primary hub for provision of community services and facilities, and the Council has identified the delivery of an improved Camberley town centre as a priority. As part of this, the Council has pro-actively delivered a number of improvements including the acquisition and improvement of town centre property, and significant public realm enhancements. The redevelopment of a 5.5 acre site at London Road remains the single biggest regeneration opportunity in the town centre.
- 2.2.10 Aside from Camberley town centre, Bagshot and Frimley benefit from a district centre, and there are also a number of local centres and neighbourhood parades in the Borough. The most significant out-of-centre retail exists at Bagshot retail park, while the Meadows retail park is just outside the Borough.
- 2.2.11 In the Indices of Multiple Deprivation 2019, Surrey Heath is ranked as the 9th least deprived local authority in England. However, this masks pockets of much higher levels of relative deprivation, with the three worst performing areas associated with different locations within the western urban area.
- 2.2.12 Finally, as part of this initial discussion seeking to briefly introduce the plan area, there is a need to note the large residential scheme currently under construction at the former Princess Royal Barracks in Deepcut (Mindenhurst). This will deliver around 1,200 dwellings and associated infrastructure.

2.3 The plan period

- 2.3.1 The duration of the plan is for 19 years from 1st April 2019 to 31st March 2038. The previous proposal, at the Issues and Options/Preferred Options stage (2018), was to plan for a 16 year period from 2016 to 2032, but it is good practice to plan for a longer time horizon where possible as stipulated within the NPPF:
- “Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments... form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years)...”*

2.4 Legislative and policy context

- 2.4.1 The plan is being prepared under the Town and Country (Local Planning) Regulations 2012, must reflect current Government policy as set out in the NPPF (2021) and must also be prepared in accordance with Government’s online Planning Practice Guidance (PPG). In particular, the NPPF requires local authorities to take a positive approach to development, with an up-to-date local plan that meets objectively assessed needs, including local housing needs (LHN), as far as is consistent with sustainable development.

³ The HMA was confirmed by the Hart, Rushmoor and Surrey Heath Strategic Housing Market Assessment (SHMA, 2016) and the FEA is discussed as a key geography in the Employment Land Technical Paper Update (2019). Both geographies are discussed within the Government’s Planning Practice Guidance (PPG), including for [effective cooperation](#) and [economic need](#).

- 2.4.2 The plan is also being prepared taking account of objectives and policies established by various organisations at national and local levels, in accordance with the Duty to Cooperate established by the Localism Act 2011. For example, context is provided by policy/strategy established by the Enterprise M3 LEP and Surrey County Council (most notably in relation to transport, minerals, waste and education). Surrey Heath Borough also cooperates with neighbouring areas including Bracknell Forest, Windsor and Maidenhead, Runnymede, Woking, Guildford, Rushmoor and Hart.
- 2.4.3 Finally, it is important to note that the plan will be prepared mindful of the 'made' Windlesham Neighbourhood Development Plan (NDP) and the emerging NDPs for Deepcut and Chobham. NDPs must be in general conformity with the Local Plan, which means that made and emerging NDPs may need to be reviewed to bring them into line with the emerging plan; however, it is equally the case that made and emerging NDPs will be a consideration when preparing the Local Plan.

2.5 Plan objectives

- 2.5.1 The current Draft Plan consultation document presents a list of objectives to guide plan preparation, and these are an important starting point when giving consideration to the issues and alternative options ('reasonable alternatives') that should be a focus of SA. The plan objectives are as follows:
1. Deliver sustainable development that contributes to meeting **housing** needs, providing new homes of an appropriate housing mix and tenure, including specialist housing needs.
 2. Protect Strategic and Locally important **employment** sites to ensure an appropriate supply of employment land to help fulfil the Borough's role in facilitating strong economic performance within the Functional Economic Area (Hart, Rushmoor and Surrey Heath) and wider EM3 LEP area.
 3. Enhance the vitality and viability of **Camberley Town Centre** and the other District and Local centres within the Borough.
 4. Ensure that development within the Borough is supported by the necessary physical, social and green **infrastructure** to meet the needs of Surrey Heath residents.
 5. Ensure that development does not have a detrimental impact on the Borough's **environmental assets** including designated international and national sites, landscape character, water quality and biodiversity and that new development provides for biodiversity and environmental net gains.
 6. Ensure that new development minimises or mitigates the impact of development on air quality, noise, light pollution, odours, emissions and particulates [**environmental quality**].
 7. Ensure that new development, unless appropriate under the Exceptions Test, is not located in areas of high or medium risk of **flooding** and that development does not increase surface water run-off.
 8. Support action on **climate change** and reduction of the Borough's carbon emissions, aiding the transition to net zero through a combination of **mitigation and adaptation** measures, including the appropriate delivery of opportunities for renewable energy, energy efficiency and improving resilience to the impacts of climate change.
 9. Protect the character and purpose of the **Green Belt** and the character of the Countryside beyond the Green Belt.
 10. Conserve and enhance the Borough's **built environment and heritage assets**, both designated and non-designated.
 11. Promote healthy, sustainable and cohesive local **communities** through good design and access to homes, employment, community and recreational facilities.
 12. Support measures that prioritise **active and sustainable travel** modes including improved facilities for pedestrians and cyclists and improvements to public transport

A strategic plan

- 2.5.2 It is important to recognise that the Local Plan will be strategic in nature, and hence omit consideration of some detailed issues in the knowledge that they can be addressed at subsequent stages of the planning process, principally the planning application stage. For example, it is appropriate to defer certain detailed matters relating to masterplanning and design of development sites to the planning application stage.
- 2.5.3 The scope of the Local Plan is reflected in the scope of the SA (discussed in the following section).

3 The SA scope

3.1 Introduction

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

3.2 Consultation on the scope

- 3.2.1 The Strategic Environmental Assessment (SEA) Regulations 2004 require that: “*When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA scope], the responsible authority shall consult the consultation bodies.*” In England, the consultation bodies are the Environment Agency, Historic England and Natural England.⁴ As such, these authorities were consulted on the SA scope in 2017.
- 3.2.2 The outcome was an SA ‘framework’ comprising **26 objectives** grouped under **5 topics**. The framework was then used to structure the appraisal presented in the 2018 Interim SA Report published as part of the Issues and Options/Preferred Options consultation. No comments were received on the SA scope.

3.3 The SA framework

- 3.3.1 At the current time, in the view of AECOM, it is appropriate to rationalise the SA framework by grouping the **26 objectives** under **13 topics** and using this list of topics as the primary ‘level’ of the framework. This is appropriate with a view to ensuring the appraisal is suitably structured, concise and accessible.
- 3.3.2 Table 3.1 presents the list of 26 objectives (from the 2017 scoping stage) grouped under the new list of 13 topic headings. Some objectives appear under more than one topic heading (‘cross-cutting’).

Table 3.1: The SA framework

Topic	Objectives
Accessibility [to community infrastructure]	<ul style="list-style-type: none"> • Improve opportunities for access to education, employment, recreation, health, community services and cultural opportunities for all sections of the community • Sustain and enhance the viability and vitality of town, district and local centres • Improve the education and skills of the local population • Maintain and improve cultural, social and leisure provision
Air / env quality	<ul style="list-style-type: none"> • Ensure air quality continues to improve in line with national and/or WHO global targets • Reduce noise pollution
Biodiversity	<ul style="list-style-type: none"> • Conserve and enhance the Borough’s biodiversity • Ensure the protection of the Special Protection Areas (SPAs)

⁴ In-line with Article 6(3) of the SEA Directive, these bodies were selected because “*by reason of their specific environmental responsibilities,[they] are likely to be concerned by the environmental effects of implementing plans and programmes.*”

Topic	Objectives
Climate change adaptation ⁵	<ul style="list-style-type: none"> • Minimise the risk of flooding • Encourage reduced water consumption
Climate change mitigation ⁶	<ul style="list-style-type: none"> • Reduce greenhouse gas emissions • Increase energy efficiency and increase the use of renewable energy • Encourage the use of more sustainable modes of transport (active and public) and reduce traffic congestion
Communities and health ⁷	<ul style="list-style-type: none"> • Improve the population's health • Improve the education and skills of the local population • Reduce crime, fear of crime and social exclusion • Encourage the enjoyment of the countryside, open spaces and local biodiversity • Sustain and enhance the viability and vitality of town, district and local centres
Economy and employment	<ul style="list-style-type: none"> • Support inclusive and diverse economic growth • Maintain stable levels of employment in the Borough • Support existing business structure and businesses • Sustain and enhance the viability and vitality of town, district and local centres
Heritage	<ul style="list-style-type: none"> • Protect and where appropriate enhance the landscape, buildings, sites and features of archaeological, historical or architectural interest and their settings
Housing	<ul style="list-style-type: none"> • Meet identified housing need
Landscape	<ul style="list-style-type: none"> • Protect and where appropriate enhance the landscape, buildings, sites and features of archaeological, historical or architectural interest and their settings • Maintain and enhance the quality of countryside, Green Belt and open space areas
Land, soils and resources	<ul style="list-style-type: none"> • Make the best use of previously developed land (PDL) and existing buildings • Reduce contamination and safeguard soil quality and quantity • Reduce generation of waste and maximise re-use and recycling
Transport	<ul style="list-style-type: none"> • Encourage the use of more sustainable modes of transport (public transport/cycling/walking) and reduce traffic congestion
Water	<ul style="list-style-type: none"> • Maintain and improve the quality of water resources • Encourage reduced water consumption

⁵ There are wide-ranging further climate change adaptation considerations, as discussed in *Addressing climate change through the Surrey Heath Local Plan* (AECOM, 2020), including the climate change risk assessment in [Appendix 1](#) of the report.

⁶ There are wide-ranging further climate change mitigation considerations, as discussed in *Addressing climate change through the Surrey Heath Local Plan* (AECOM, 2020), including the review of links to NPPF policy in [Section 6](#).

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

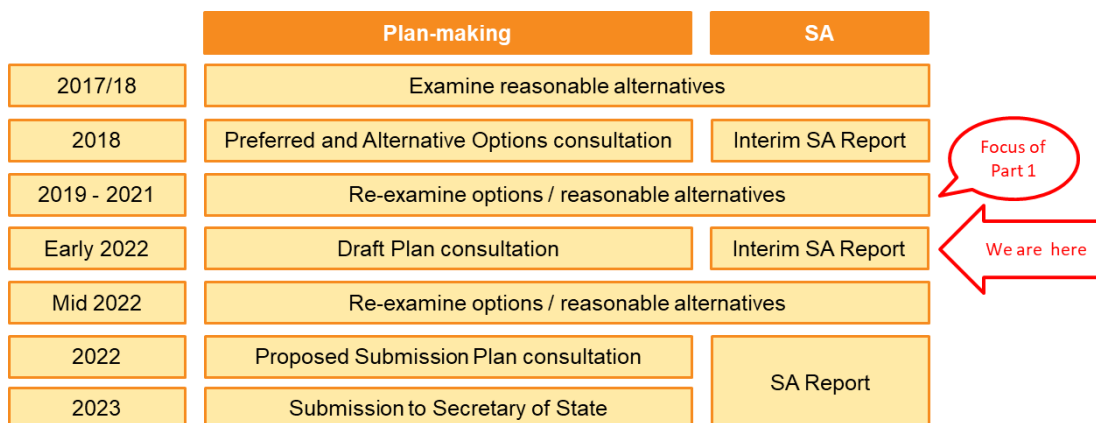
Part 1: What has plan-making / SA involved up to this stage?

4 Introduction to Part 1

Overview

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

Figure 4.1 Overview of the plan-making / SA process



- 4.1.2 The focus here, within Part 1, is not to relay the entire 'backstory' of the plan-making /SA process, or to provide a comprehensive audit trail of decision-making over time. Rather, the aim is to report work undertaken to examine **reasonable alternatives** in 2021. Specifically, the aim is to:

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

- 4.1.3 Presenting this information is in accordance with the regulatory requirement to present an appraisal of 'reasonable alternatives' and 'an outline of the reasons for selecting the alternatives dealt with' within the SA Report (N.B. this is not the SA Report, but aims to present the information required of the SA Report).

What about earlier stages of SA?

- 4.1.4 A considerable amount of work was completed and published for consultation in the 2018 Interim SA (ISA) Report, including work to explore reasonable alternatives. For example, and notably, the report (Appendix B) appraised the option of meeting needs through brownfield only versus also allowing loss of greenfield.
- 4.1.5 Earlier work provided a key input to the process of establishing reasonable alternatives in 2021 and, as such, is discussed further below. However, findings of earlier work stages naturally become out-of-date and superseded, such that there is little to be gained from reporting findings in full at the current time.

Reasonable alternatives in relation to what?

- 4.1.6 The legal requirement is to examine reasonable alternatives (RAs) taking into account the objectives of the plan (see Section 2). Following discussion of plan objectives with officers, it was determined appropriate to focus on the spatial strategy, i.e. providing for a supply of land, including by allocating sites and potentially broad areas (NPPF paragraph 68), to meet objectively assessed needs and wider plan objectives. Establishing a spatial strategy is clearly an overarching objective of the Local Plan.⁸
- 4.1.7 The decision was made to refer to the spatial strategy alternatives as **growth scenarios**.

⁸ It was also considered appropriate to focus on 'spatial strategy' given the potential to define "do something" alternatives that are meaningfully different, in that they will vary in respect of 'significant effects'. This approach is in line with the SEA Regulations, and the PPG is clear that SA "should only focus on what is needed to assess the likely significant effects of the plan". There is also nothing to be gained by defining a 'reasonable alternative' that equates to the baseline situation.

What about site options?

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

Is the focus on housing sites?

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

What about other aspects of the plan?

- 4.1.10 As well as establishing a spatial strategy, allocating sites etc., the Local Plan must also establish policy on thematic borough-wide issues as well as site-specific policies to guide decision-making at the planning application stage. Broadly speaking, these can be described as development management (DM) policies.
- 4.1.11 It is a challenge to establish DM policy alternatives that are genuinely reasonable.⁹ However, through discussion with Officers it was determined reasonable and appropriate to go through a process to explore this matter, which led to two sets of RAs being identified and appraised, specifically in respect of: 1) built environment decarbonisation; and 2) biodiversity net gain. Also, it was determined reasonable to explore RAs in respect of Chobham’s Green Belt status. **Appendices III and IV** present further information.

Structure of this part of the report

- 4.1.12 This part of the report is structured as follows:
- **Section 5** – explains a stepwise process leading to the definition of growth scenarios,
 - with supplementary analysis in **Appendix V**;
 - **Section 6** – presents an appraisal of the growth scenarios;
 - **Section 7** – presents a statement provided by SHBC Officers setting out a response to the appraisal.

Who’s responsibility?

- 4.1.13 It is important to be clear that: selecting reasonable alternatives is the responsibility of the plan-maker (SHBC), with AECOM acting in an advisory capacity; appraising the reasonable alternatives is the responsibility of AECOM; and selecting the preferred option is the responsibility of the plan-maker.

Commenting on this part of the report

- 4.1.14 Comments are particularly welcomed on:
- the decision to focus primarily on ‘growth scenarios’ (**this section**);
 - the growth scenarios selected, with reference to the process for defining these (**Section 5**);
 - the appraisal of growth scenarios (**Section 6**);
 - Officers’ reasons for supporting the preferred scenario (**Section 7**);
 - the process of defining and appraising DM policy alternatives (**Appendix III**);
 - the process of defining and appraising alternatives for Chobham (**Appendix IV**); and
 - the supplementary GIS analysis of site options that fed into Section 5 (**Appendix V**).

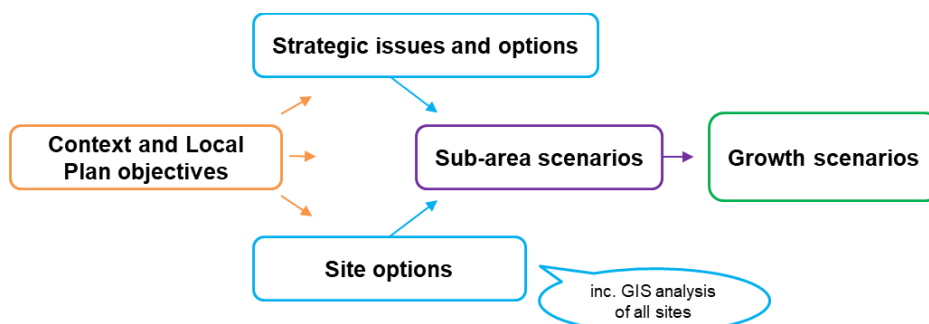
⁹ Recalling that to be ‘reasonable’ alternatives must be meaningfully different, to the extent that it is ultimately possible for an appraisal to confidently differentiate between the alternatives in terms of significant effects.

5 Defining growth scenarios

5.1 Introduction

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

Figure 5.1: Establishing reasonable growth scenarios



Structure of this section

5.1.2 This section of the report is structured as follows:

- **Section 5.2** – explores strategic issues and options with a bearing on growth scenarios;
- **Section 5.3** – considers individual site options with a bearing on growth scenarios;
- **Section 5.4** – explores growth scenarios for individual sub-areas within the Borough;
- **Section 5.5** – draws upon the preceding sections to define reasonable growth scenarios.

A note on limitations

5.1.3 It is important to emphasise that this section does not aim to present an appraisal of reasonable alternatives. Rather, the aim of this section is to describe the *process* that led to the definition of reasonable alternatives for appraisal. Further discussion of limitations is presented below.

5.2 Strategic issues and options

Introduction

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

- Quantum – how many new homes are needed (regardless of capacity to provide them)?
- Distribution – which broad areas within the Borough are more suited and less suited to growth?

Quantum

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

Background

5.2.3 A central tenet of plan-making process is the need to **A**) establish housing needs; and then **B**) develop a policy response to those needs. The Planning Practice Guidance (PPG) explains:

“Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations.”

- 5.2.4 With regards to (A), the NPPF (paragraph 60) is clear that establishment of **LHN** should be informed by an “assessment conducted using the **standard method**... unless exceptional circumstances justify an alternative approach which also reflects... demographic trends and market signals” [emphasis added].
- 5.2.5 With regards to (B), many local authorities will respond to assessed LHN by providing for LHN in full or, in other words, setting a **housing requirement** that equates to LHN, and a **housing supply** through policies sufficient to deliver this housing requirement (at a suitable rate/trajectory over time, which will invariably necessitate putting in place a ‘buffer’ to mitigate against the risk of unforeseen delivery issues). However, under certain circumstances it can be appropriate to set a housing requirement that departs from LHN.

Surrey Heath’s LHN

- 5.2.6 A three-step standard method for calculating LHN was first published by the Government in 2017, and then a fourth step was added in 2020.¹⁰ This fourth step, known as the ‘cities and urban centres uplift’, does not have a bearing on the calculation of Surrey Heath Borough’s LHN.
- 5.2.7 There have also been some notable changes to guidance in respect of the data that should be utilised as an input to the standard method, since the method was first introduced. Specifically, following a consultation in late 2018, the PPG was updated to require that the household growth projections used as an input to the method must be the 2014-based projections, rather than more recent projections. The PPG explains that the change was made in order to:¹¹ “provide stability... ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government’s objective of significantly boosting the supply of homes.” Updates to the PPG in late 2020 confirmed this approach.
- 5.2.8 The standard method derived LHN for the Borough is currently **327 dwellings per annum**, or 6,213 homes in total over the plan period (2019–2038).¹² The Secretary of State for Levelling Up, Housing and Communities has indicated that the standard methodology will be reviewed in spring 2022.

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

- 5.2.9 Paragraph 11 of the NPPF states: “... strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, **unless**: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.” [emphasis added]
- 5.2.10 Aligned with this, Paragraph 010 of the PPG on Housing and Economic Needs Assessment explains: “... there will be circumstances where it is appropriate to consider [higher growth]... Circumstances where this may be appropriate include, but are not limited to situations where... an authority agreeing to take on unmet need from neighbouring authorities...”
- 5.2.11 Mindful of this context, and in light of the preferred spatial strategy set out in the Surrey Heath Issues and Options / Preferred Options consultation document (2018; also the evidence-base at the time, including an Interim Capacity Study, discussed below), the decision was made through the Hart Local Plan Examination in 2019/20 that the Hart Local Plan should make provision for unmet need from Surrey Heath. [Paragraph 90](#) of the Hart Local Plan explains that the housing requirement comprises LHN plus: “An additional 41 homes per annum... to address an unmet housing need in Surrey Heath...”
- 5.2.12 The precise unmet need figure has been the subject of continued discussion between the two Councils, culminating in a letter received on 21st December 2021 confirming that Hart District remains committed to delivering 41 dpa to contribute toward unmet need in Surrey Heath for the remainder of their plan period. This applies for the 13 years (2019-2032) covered by both plan periods, leading to 533 homes in total.
- 5.2.13 On this basis, there is a clear argument for setting the housing requirement at 6,213 – 533 = 5,680 homes, equivalent to **299 dwellings per annum** (dpa) on average over the plan period. This figure breaks down as 264 dpa up to 2032, to reflect the contribution from Hart District Council, and then 327 dpa for the remainder of the plan period, but it is appropriate to focus on the average (299 dpa). Moving forward, 299 dpa is discussed as a ‘adjusted average housing need’ figure for Surrey Heath over the plan period.

¹⁰ See [gov.uk/guidance/housing-and-economic-development-needs-assessments](https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments).

¹¹ See paragraph 4 and 5 at: [gov.uk/guidance/housing-and-economic-development-needs-assessments](https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments)

¹² This is a ‘capped’ figure, meaning that step 3 of the standard method (“Capping the level of any increase”) applies. Specifically, LHN is capped at 40% above the 191 dpa requirement in the adopted Local Plan (2012). The uncapped figure is 335 dpa.

Is it reasonable to explore higher growth scenarios?

- 5.2.14 As discussed above, Paragraph 010 of the PPG on Housing and Economic Needs Assessment sets out reasons for providing for 'above LHN' through Local Plans, explaining:

“The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area... .

... Circumstances where [higher growth] may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of: growth strategies for the area that are likely to be deliverable... (e.g. Housing Deals); strategic infrastructure improvements that are likely to drive an increase in [need]; or an authority agreeing to take on unmet need from neighbouring authorities... There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need... are significantly greater than the outcome from the standard method.”

- 5.2.15 However, in the Surrey Heath context there is little or no argument for exploring options involving providing for higher growth (i.e. above 299 dpa) on the basis of this guidance, broadly for two reasons:

- Firstly, the majority of the potential reasons for exploring higher growth do not apply to Surrey Heath. With regards to the matter of responding to a 'growth strategy', whilst it is recognised that Camberley is an important hub of economic activity in the sub-region (see paragraph 2.2.4), there is no identified higher housing growth opportunity. The Local Housing Needs Assessment (2020) explains: *“We have also calculated the population associated with Economic forecasts for Surrey Heath. These show housing need both below and above the standard methodology suggesting there is broad alignment...”*
- Secondly, with regards to unmet needs, whilst there is a risk of unmet needs arising from the east of Surrey, there is little or no reason to suggest that Surrey Heath is well placed to provide for any unmet needs that do arise. First and foremost, this is on the basis of the environmental constraints affecting the Borough (as discussed above and below). Secondly, this is on the basis of evidence that Surrey Heath lies within a different housing market area (HMA) to other Surrey authorities, including evidence from the Strategic Housing Market Assessment (SHMA, 2016). Specific considerations are as follows:
 - There is low risk of unmet needs arising from Surrey Heath's adjacent Local Authorities (Bracknell Forest, Windsor and Maidenhead, Runnymede, Woking, Guildford, Rushmoor and Hart), all of which either have an up-to-date adopted Local Plan that makes provision for housing needs, or an emerging draft Local Plan that is well-advanced and makes provision for needs.
 - Woking is a constrained borough that is unable to meet housing needs in full through its Local Plan, but the adopted Guildford and Waverley Local Plans make provision for the unmet need.¹³ It is recognised that Woking's current plan period is only to 2027, and there is currently no timetable for a Local Plan Review, leading to a risk of unmet needs arising from Woking beyond 2027; however, there is little reason to suggest that Surrey Heath would be well placed to provide for any such unmet needs, because of the environmental constraints that exist, including as shown in Figure 5.2.
 - With regards to the east of Surrey, there is likely to be unmet need arising from Mole Valley, following a recent draft plan consultation that proposed setting the housing requirement below LHN leading to a total unmet need of 1,750 homes over the 17 year plan period (see discussion under Policy S1 [here](#)). Also, it is recognised that the Elmbridge and Epsom and Ewell Local Plans are delayed, and that the adopted Reigate and Banstead Local Plan runs only to 2027 (with no timetable for a Local Plan Review). However, again, there is little or no reason to suggest a risk of the Surrey Heath Local Plan needing to provide for any unmet needs that arise, given the constraints that exist. A key point to note is that whilst Surrey Heath does have some countryside beyond the Green Belt (unlike the east of Surrey), this is limited in extent and heavily constrained, as discussed further below.

- 5.2.16 Finally, there is a need to consider affordable housing, with the PPG stating:¹⁴ *“An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.”* Affordable housing needs are explored in detail through the Housing Needs Assessment (2020), which finds that there is a total need for 246 affordable homes per annum (broken down into two categories), and concludes: *“These numbers are relatively high compared to overall need; this justifies the Council seeking to secure as much additional affordable housing as viably possible.”*

¹³ Matters are explained within the recent Inspector's Report for the Woking Site Allocations DPD, see paragraph 40 [here](#).

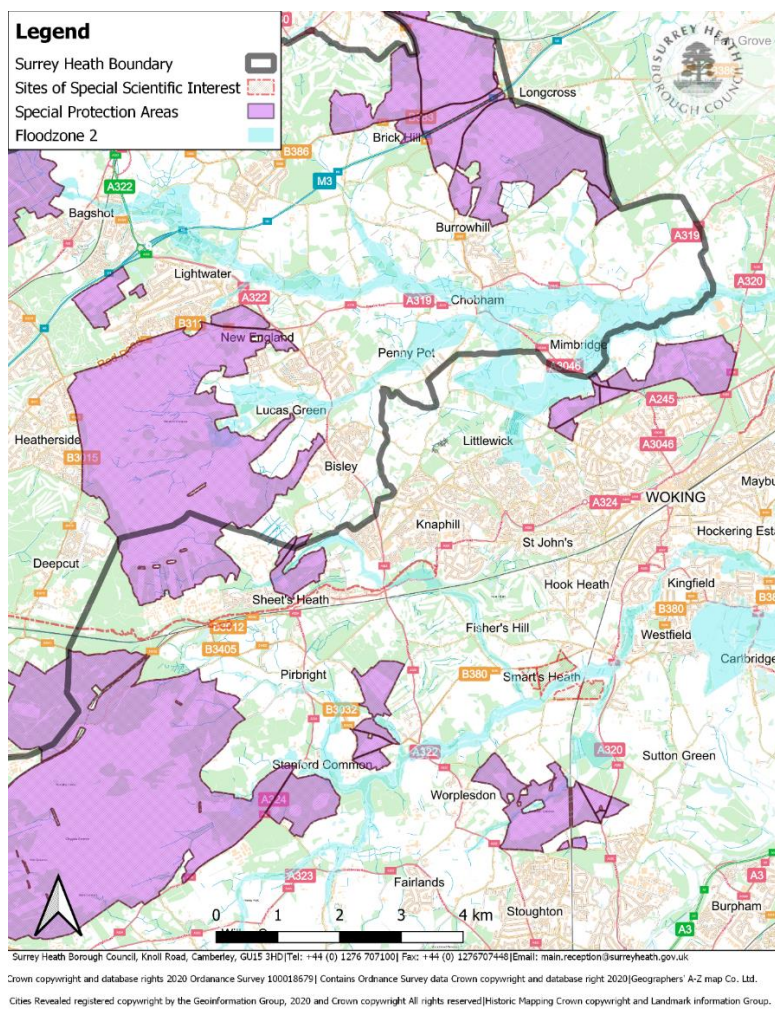
¹⁴ See paragraph 024 at: [gov.uk/guidance/housing-and-economic-development-needs-assessments](https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments)

5.2.17 The figure of 246 per annum amounts to 82% of the 299 dpa discussed above. There is no potential to deliver affordable housing as a proportion of market housing at this rate. However, there is potential to deliver affordable housing at a rate of perhaps 40% (subject to viability; see further discussion under the 'Housing' heading in Section 6). This serves as a reason to explore the possibility of higher growth scenarios, i.e. setting the housing requirement at a figure above 299 dpa. However, there is a need to be mindful that demand for market housing could become a limiting factor on affordable housing delivery.

Conclusion on housing quanta options to examine further

5.2.18 Surrey Heath Borough is in a somewhat unusual situation, in that the default option for the Local Plan is not to set the housing requirement at LHN (327 dpa), but rather an adjusted average housing need figure (299 dpa). This is due to the adopted Hart Local Plan providing for unmet needs from Surrey Heath. As such, reasonable growth scenarios should be primarily focused on providing for 299 dpa. Given the extent of Green Belt and SPA constraints there is also a clear justification for exploring lower-growth scenarios, subject to detailed consideration of capacity/supply options. With regard to higher growth scenarios, the constraints affecting Surrey Heath serve as a reason to suggest that these should be ruled out as unreasonable. However, the evidence on affordable housing needs (discussed above) serves as a reason for giving further consideration to the possibility of setting the housing requirement at a figure above 299 dpa. The matter of precise quanta figures to reflect is returned to within Section 5.5, subsequent to consideration of broad distribution options, site options and sub-area scenarios.¹⁵

Figure 5.2: Headline environmental constraints in the vicinity of Woking



¹⁵ It is important to reiterate that there is invariably a need to provide for a supply buffer over-and-above the housing requirement to ensure that the requirement is met in practice over the plan period (recognising that unforeseen issues with planned supply are inevitable), and ensure a robust supply trajectory, i.e. a situation whereby a five year housing land supply (5YHLS), as measured against the housing requirement, can be maintained throughout the entire plan period. The ideal situation involves a steady housing trajectory. However, under the Government's PPG, there is flexibility to set a 'stepped' housing requirement/trajectory, where there is evidence to demonstrate that this is necessary in light of wider sustainable development objectives. A stepped requirement/trajectory is one whereby the requirement is set at a level below the annualised total plan period housing requirement in the early years of the plan, and then this is compensated for in the latter years of the plan.

Broad distribution

Introduction

5.2.19 This is the second of two sections examining ‘strategic issues and options’ of relevance to the matter of defining reasonable growth scenarios for the Local Plan. This section explores evidence relevant to broad distribution in chronological order before reaching a broad conclusion on the key broad housing distribution issues and options that should feed into definition of the reasonable growth scenarios.

Interim Capacity Study (2018)

5.2.20 An appropriate starting point is the Interim Capacity Study prepared in April 2018, ahead of the Issues and Options / Preferred Options consultation, which sets out “*key environmental and policy constraints to housing delivery that affect the Borough.*” The study went through a stepped process in order to justify a decision to propose a spatial strategy involving a housing requirement for the plan period (and a potential land supply) *below* LHN, as discussed above at paragraph 5.2.11.

5.2.21 Section 3 of the study considers ‘constraints to residential development’ under the following headings:

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

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

With regards to land beyond the 400m buffer zone the JSPB Delivery Framework established the principle of Suitable Alternative Natural Greenspace (SANG) provision as a means of avoiding and mitigating impacts, and the Surrey Heath SPD sets out detailed guidance, including that development schemes involving 136 or more net residential units will *generally* be expected to provide bespoke SANG solutions (N.B. larger developments in the western urban area may also be able to use capacity at *strategic* SANGs, and this approach may also apply to sites outside this area that have particular, site specific circumstances which support the need for off-site SANGs provision).

The Councils SANG Strategy (2020) set out the Council’s approach to the provision of SANG, concluding that that “*SANG capacity in the west of the Borough is becoming very limited*”. The issue reflected the inherent constraints to delivering SANG in this area combined with a significant amount of SANG capacity being banked by applications not coming forward (most notably Prior Approvals). However, a significant amount of work was subsequently undertaken to explore options for increasing SANG capacity (also reducing the baseline need for SANG by reducing the time period for which a planning application is valid), as explained within the Thames Basin Heaths Topic Paper (2021). The situation has now improved, but there remain issues, which are discussed further below, in Sections 5.3 and 5.4.

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

- Green Belt – the study sets out the national policy context, in respect of Green Belt purposes and the potential to release land from the Green Belt through a Local Plan only in ‘exceptional circumstances’.

It is also important to note that the study was preceded by a Green Belt and Countryside Study (2017), which examined the degree to which all land within the Green Belt *and countryside beyond the Green Belt* contributes to the nationally defined Green Belt purposes. The study defined and assessed 71 land parcels within the Green Belt and 36 within the CBGB, concluding:

“... nearly all of the Green Belt and countryside beyond the Green Belt within Surrey Heath fulfils at least two of the purposes of the Green Belt as set out within the National Planning Policy Framework, with many of the functioning Parcels identified as performing either moderately or strongly against at least one Green Belt Purpose. Only 6 Parcels (including sub-divided Parcels) were identified as failing to meet any of the defined Purposes, based on the Methodology set out in Section 5. All of these comprised built-up areas of the washed over Green Belt settlement area of Chobham.”

With regards to “*the washed over Green Belt settlement area of Chobham*”, this is returned to below.

Furthermore, two subsequent studies have examined the Green Belt:

- In 2018 LUC assessed all potential housing sites – both within the Green Belt and within the countryside beyond the Green Belt (CBGB) – in respect of contribution to Green Belt purposes. Site specific issues and options are discussed further in Section 5.3.
- In 2021/22 SHBC Officers prepared a further study examining detailed parcels (i.e. more detailed than the 2017 study) surrounding settlements (within 400m).¹⁶ There is a clear merit to exploring parcels with robust boundaries (e.g. woodlands), as opposed to submitted sites that typically reflect land ownership boundaries. The study also included a focus on identifying previously developed sites in the Green Belt. Finally, the study goes a step further than the previous studies by providing an overall assessment of Green Belt function and assessing the impact of release of parcels on the integrity of the wider Green Belt.

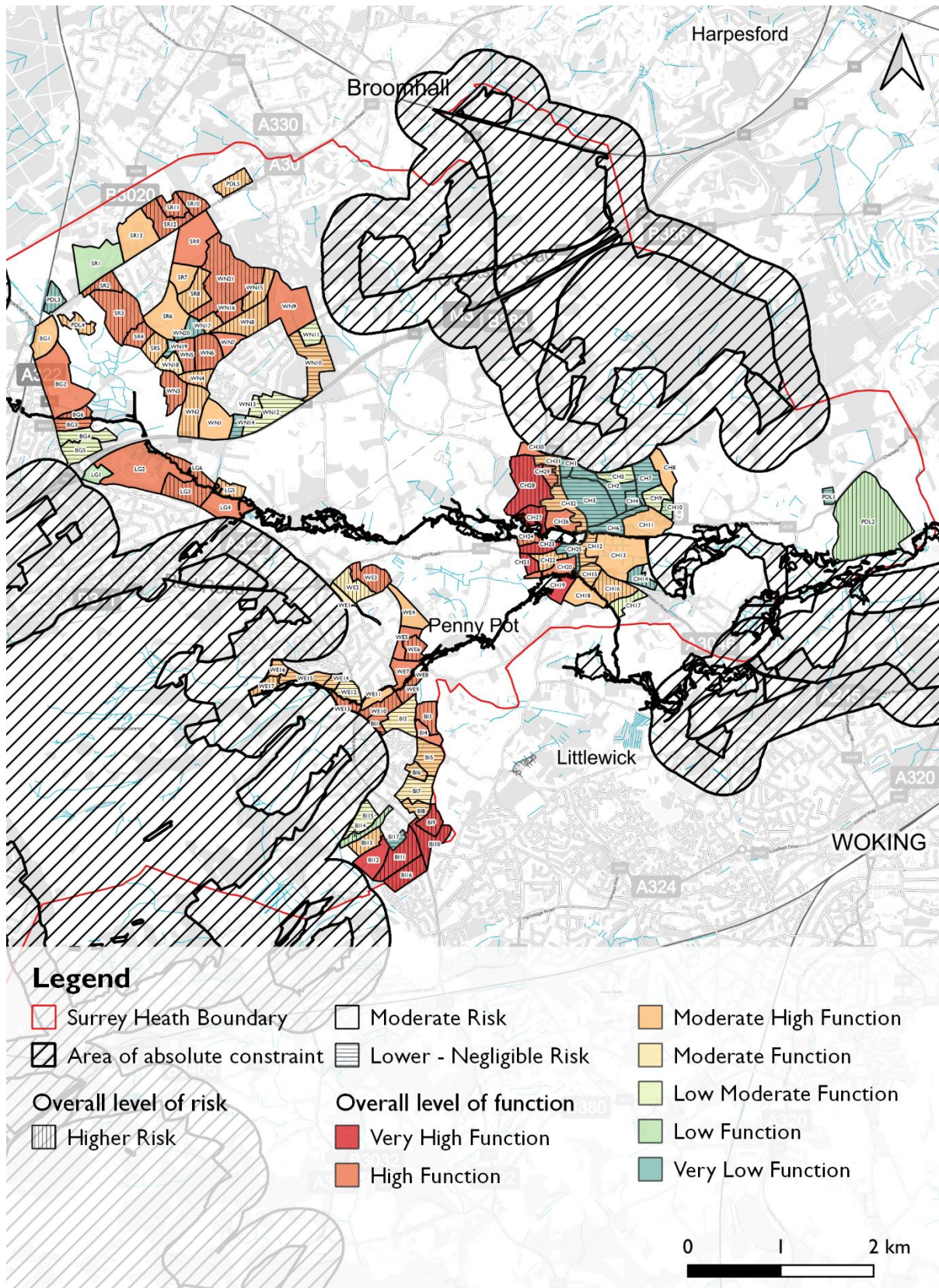
Figure 5.3 shows the key findings of the 2021/2022 study, indicating the level of function of each Parcel against the purposes of the Green Belt as set out in the NPPF, in addition to indicating where release of land would result in the highest and lowest risk to the integrity of the wider Green Belt. The Study recognises that Parcels which demonstrate high functionality and that are also rated as posing a higher risk to the integrity of the wider Green Belt are likely to result in high harm to the Green Belt in the event that they are released. Areas which function poorly and that are also identified as presenting a low or negligible risk to the integrity of the wider Green Belt are likely to result in the least harm to the Green Belt in the event of release.

- Other constraints – the Interim Capacity Study also explained that flood risk zone 3b acts as an absolute constraint to growth within parts of the Borough, and that a further constraint is the Farnborough Airport Public Safety Zone, albeit this is a small area with little bearing on the Local Plan.

5.2.22 Overall, the study concluded that *“approximately 45% of land within the Borough is affected by policy or environmental constraints which represent an absolute constraint to residential development, with an additional 29% of land (over and above that affected by absolute constraints) designated as Green Belt...”* It is important to note that the study focused on exploring ‘absolute’ constraints’ affecting the Borough and the Green Belt constraint, but did not explore additional constraints that can and should be taken into account when defining and appraising reasonable growth scenarios. These constraints - for example in respect of local biodiversity designations, flood risk zones 3a and 2, surface water flood risk, historic environment designations and infrastructure capacity - are discussed further below.

¹⁶ The decision was taken not to define/assess parcels adjacent to Woking and Sunningdale.

Figure 5.3: Summary findings of the Green Belt Review (2022)



Issues and Options / Preferred Options consultation (2018)

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

Employment Land Technical Paper Update (2020)

5.2.28 This study seeks to update similar studies completed in 2015 and 2016, and aims to “consider the supply of and demand for employment land and premises in Surrey Heath Borough [having] regard to the wider Functional Economic Area (FEA)... to provide evidence to inform and support policies for employment land in the forthcoming Surrey Heath Local Plan.” Importantly, the study introduction also explains:

“the forecasts used to determine future jobs growth and the required amount of employment land to support this are based on projections that were produced prior to the global COVID-19 pandemic.”

5.2.29 A headline conclusion of the study (see final paragraph of the executive summary) is that, without the allocation of new land for employment over the plan period, the supply / demand balance will be *“marginal... particularly in respect of office accommodation.”* Other headline points include:

- There are a range of supply/demand balance figures discussed, depending on the demand forecast that is applied. Under a ‘worst case scenario’, whereby demand is forecast on the basis of past development rates, there is a 12.2 ha supply shortfall over the period 2019-2037 (after having accounted for the existing pipeline, or ‘baseline’, of supply, e.g. consented sites) to be addressed through the Local Plan. However, the study does qualify this shortfall figure, explaining *“The past development rates scenario points to an undersupply... however patterns of use and economic structure are expected to change in the future and some sites will allow for recycling of land as indicated by net completions trends.”*
- With regards to the headline conclusion that there is a broad (‘marginal’) balance between demand and existing (i.e. baseline) supply, the study explains that this is *“subject to suitability of sites.”*
- Surrey Heath is expected to see the strongest growth in Office and Research and Development (R&D) based sectors up until 2037-2040. Meanwhile, despite key local strengths in the area, there is a forecast long-term decline in manufacturing. Accordingly, monitoring of industrial sites should be undertaken and consideration be given where appropriate to them being redeveloped for alternate employment uses including certain office developments, storage and distribution, and small cluster/incubator units for developing micro businesses.
- Whilst labour demand forecasts indicate a small decline for storage and distribution uses, both gross and net completions suggest there is a need for warehousing in the Borough. It is considered that this can be delivered through renewals on existing industrial areas, or sites of manufacturing decline.

Storage and distribution uses are potentially an example of an employment land use for which demand may potentially have risen since 2019, which was the base date for the forecasts applied through the study, in light of the rise of online retail. It is noted that a Freight and Logistics Strategy for the South East is soon to be published (see transportforthesoutheast.org.uk/our-work/freight-and-logistics).

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

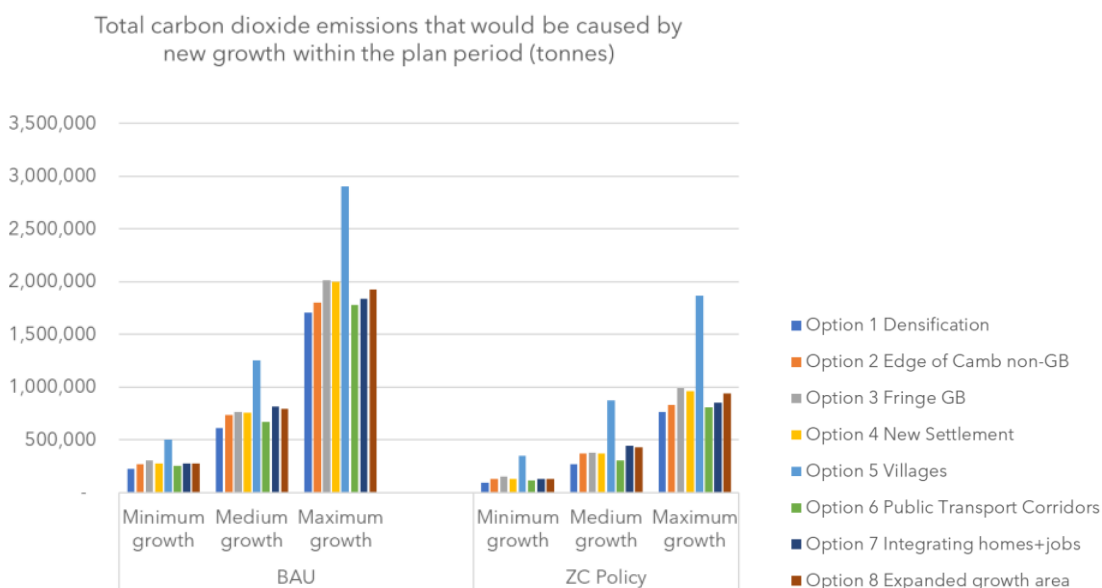
5.2.30 This report considers climate change mitigation and adaptation in turn, in both cases exploring three key questions: 1) What is the context? 2) What is the baseline scenario? 3) What are the intervention options feasibly open to the Council (with a focus on interventions reasonably within the scope of the Local Plan)?

5.2.31 The executive summary presents a [summary](#) of ‘intervention options’, including with a focus on ensuring that climate change is central to decision-making in respect of spatial strategy as much, if not more so, than through development management policy. The first three headline interventions are as follows:

- Proactively explore spatial strategy options for shaping the Borough in a way that contributes to radical reductions in emissions, in accordance with NPPF paragraphs 148 and 149. Amongst other things, this will mean exploring options that direct growth to: those parts of the Borough where residents would have greatest opportunity to access services, facilities and employment by active and public transport; one or more strategic growth locations, where economies of scale and a mix of uses can lead to opportunities; and locations where there is an opportunity for growth to support one or more heat networks.
- There should be a particular focus on exploring decarbonisation options relating to the regeneration of Camberley town centre, which could be a once in a century opportunity. Equally, the process of exploring options should take account of climate change adaptation and resilience objectives, for example in respect of building layout, and design, shading, green infrastructure and drainage.
- Establish site-specific policy for other key strategic locations to effectively respond to climate change; for example, balancing wide ranging competing objectives.

- 5.2.32 The study also explores the question of whether decarbonisation scenarios can and should be formally defined and appraised, and the related question of whether it is appropriate to set a decarbonisation 'target' (e.g. in the form of a trajectory over time) for the Local Plan. The conclusion is that this is not necessarily a helpful or appropriate step to take (see the penultimate page of the executive summary). [Figure 18](#) of the recent UK Heat and Buildings strategy shows that steps taken in respect of new homes represent only a small proportion of total potential emissions savings to 2030.
- 5.2.33 However, methods for scrutinising growth scenarios in terms of decarbonisation objectives are emerging, and the [work](#) recently undertaken in support of the Greater Cambridge Local Plan should be reviewed as an example of good practice. The study notably explores 48 scenarios, where the variables are: 1) growth quantum; 2) spatial strategy; and 3) 'zero carbon policy' – see Figure 5.4. A key point to note is that the performance of scenarios is highly dependent on emissions from transport, leading to the 'Dispersion to villages' scenarios performing very poorly.
- 5.2.34 Emissions from transport are a very significant consideration for Local Plans; however, there is also a need to recognise the role of spatial strategy in respect of minimising built environment emissions. For example, a spatial strategy option might be seen to perform well where it directs growth to: larger schemes with economies of scale; areas with strong development viability (and therefore less concerns over the delivery of climate mitigation along with affordable housing for example); sites with land-owners willing to accept land value capture for public benefit; sites controlled by developers with a proactive approach to decarbonisation; sites associated with inherent opportunities around sharing waste heat (e.g. a WwTW, industrial operation, leisure centre) or capturing ambient heat (e.g. a watercourse); sites with inherent opportunities around renewable power (solar, wind, hydro; albeit recognising that major schemes typically feed into the national grid); and/or schemes where the masterplanning/design concept is supportive of decarbonisation, e.g. with high densities and a use mix supportive of fifth generation heat networks.

Figure 5.4: Emissions scenarios to inform the Greater Cambridge Plan (Etude & Bioregional, 2021)



Town centre uses and future directions study (2021)

- 5.2.35 The context to the study included:
- *“... the dynamic trends influencing and shaping the retail and leisure sectors. Together these policies and trends are generating significant challenges and opportunities for our high streets and town centres, including the Borough’s main centres. These trends have been further compounded and accelerated since March 2020 by the impact of the COVID-19 pandemic.”*
 - Camberley has benefitted from significant new investment over recent years (since the Town Centre AAP, 2014), and is set to further benefit from the regeneration and repurposing of some key strategic sites/buildings in the town centre over the short to medium term. Key sites are:
 - London Road – the majority of this key northern gateway site to the town centre is owned by the Council. It represents the largest regeneration opportunity in the town centre for new residential and mixed-use development, along with the provision of high quality public realm.

- The High Street, Princess Way and Knoll Walk - the Council and the Enterprise M3 Local Enterprise Partnership (LEP) have jointly invested some £4.4m in comprehensive public realm works along the High Street and Princess Way. The works were completed in early 2021.
- The Square - the Council acquired the 42,735 sqm shopping centre in 2016 and has since invested in the refurbishment of the malls.
- Ashwood House / Pembroke House - the Council has led the circa £30m redevelopment of these former office blocks which are identified as key opportunities by the AAP. Berkeley Homes is leading the residential-led redevelopment of both buildings.
- Arena Leisure Centre – located on the edge of the town centre, the Council has entered into a 25-year contract with Places Leisure, to design, build, operate and maintain a £22m facility on the site of the former Arena Leisure Centre. The new centre opened on 1st July 2021.

5.2.36 A headline conclusion of the study is that: *“The forecasts for both convenience and comparison goods show **no** Borough-wide [need] for new retail floorspace over the forecast period, up to 2038; after taking account of new retail commitments and the potential to reoccupy/repurpose vacant space.”*

5.2.37 On this basis, the study recommends:

“... concentrating, consolidating and, in some cases, repurposing the town centre’s existing retail offer. We therefore advise the Council to review its strategy for retail expansion, and instead focus the [Primary Shopping Area] on the blocks comprising The Square and The Atrium, bordered by the High Street to the east, Princess Way to the south, and Obelisk Way to the north...”

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

5.2.38 Other headline findings of the study include:

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

Latest context

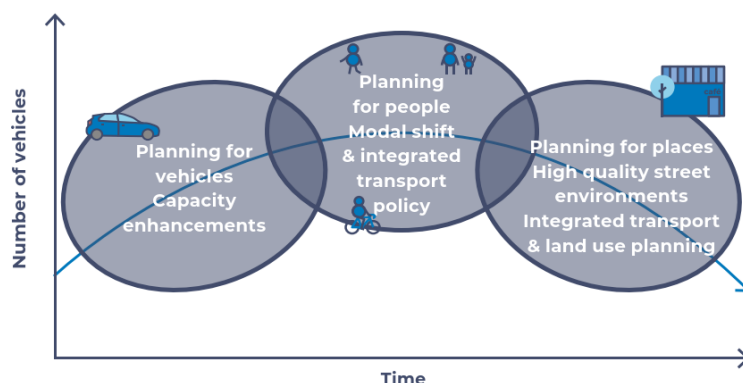
5.2.39 In addition to the broad distribution issues/opportunities and options discussed above, there are wide ranging further considerations of relevance to the task of defining reasonable growth scenarios.

5.2.40 One immediate consideration is the implications of the **C-19 pandemic** and national lockdowns, over-and-above the matters already discussed above. Key further considerations relate to:

- walking, cycling and public transport (a long term uptick in rates of walking and cycling is anticipated, supported by Government investment, but long term public transport patterns are less clear); and
 - indoor and outdoor space. In particular, green infrastructure is more valued than ever as a recreational / well-being resource, and the importance of addressing spatial imbalances in accessibility (both to green infrastructure and quality housing with outdoor space) has come to the fore.
- 5.2.41 A second key point to note, by way of updated national context with major implications for defining growth scenarios, is the increasing focus on Local Plan-making as a central component of the national strategy for addressing the climate and ecological emergency.
- 5.2.42 Beginning with the **Environment Act** (2021), perhaps its centrally important component is a national requirement for development schemes to achieve a 10% biodiversity net gain. This will be measured at the planning application stage, applying the latest Defra 'metric', but there is increasing recognition of an important role for Local Plans, including coordination of offsite compensatory habitat enhancement and creation (also referred to as 'offsetting'). There is a need to target efforts at priority landscapes (e.g. river valleys, historically wooded areas), in-line with established strategic objectives, although there is a need to balance this strategy with a desire to deliver compensatory enhancements in proximity to development.
- 5.2.43 The Environment Act also requires preparation of Local Nature Recovery Strategies (LNRSs) nationwide to guide efforts, and so it will be important for Local Plans to feed-into and integrate with LNRSs as far as possible, ensuring that they are prepared with an understanding of growth locations and means of effectively leveraging development industry funding. The Royal Town Planning Institute (RTPI) recently [commented](#) that there *"needs to be a much clearer requirement and encouragement for LNRS to take the contents of local plans into account when they are being devised and vice versa"*. Ahead of a LNRS covering Surrey Heath, there is a need to draw-upon the long established network of Biodiversity Opportunity Areas (BOAs) defined for the entire South East region (albeit these are high-level / somewhat broad brush) and also emerging work led by the local Wildlife Trust to develop a potential nature recovery map – see <https://www.bbowt.org.uk/nature-recovery-map>.
- 5.2.44 The need to avoid a situation whereby planning for biodiversity net gain leads to a net reduced emphasis on strategic, landscape scale interventions, due to an increased focus on small-scale / piecemeal interventions within development sites, was a point recently highlighted by a research study completed by ze Ermgassen et al. (2021).¹⁷ Whilst the Government had previously anticipated 25% of biodiversity units being achieved offsite, the research found the figure in practice to be much lower, and the study authors express concern about an over reliance on onsite measures as this could lead to opportunities missed in respect of *"strategic investments in the local nature recovery networks"* and *"investments in regional biodiversity priorities that can help restore biodiversity at a landscape scale"*. The authors recognise that there are strong 'access to greenspace' arguments in favour of generating biodiversity units onsite, and that an onsite focus has *"broad support from across stakeholders"*, but suggest *"this priority risks overwhelming the biodiversity goals of the policy... potential trade-offs should be explicitly discussed."*
- 5.2.45 With regards to **decarbonisation**, recent national context comes from the Ten Point Plan for a Green Industrial Revolution, the Energy White Paper, the Transport Decarbonisation Plan, the UK Net Zero Strategy and the Heat and Buildings Strategy.
- 5.2.46 Focusing on emissions from transport, the sub-national transport body – Transport for the South East - recently [responded](#) to the Net Zero Strategy as follows: *"These ambitious commitments support research conducted by TfSE which shows investment is needed across the whole transport network. Looking not only at increasing the availability, affordability and convenience of electric vehicles, but also working towards improving other modes of transport and reducing car-dependency. The additional investment in local transport systems and bus networks cited in the strategy will be essential to support this modal shift."*
- 5.2.47 With regards to the bus network, the National Bus Strategy (2021) explains: *"To avoid the worst effects of a car-led recovery – cities and towns grinding to a halt; pollution, road injuries, respiratory illness and carbon emissions all rising – we need to shift back quickly, by making radical improvements to local public transport as normal life returns. Buses are the quickest, easiest and cheapest way to do that."* The Strategy encourages integration of transport and strategic land use planning, and this is also a key message within the Transport for the South East Transport Strategy (2020) - see Figure 5.5.

¹⁷ zu Ermgassen et al; see <https://onlinelibrary.wiley.com/doi/full/10.1111/conl.12820>

Figure 5.5: A vision for transport planning over time



5.2.48 With regards to emissions from the built environment, the Ten Point Plan for a Green Industrial Revolution (2020) made clear the extent to which this is a national priority – see Table 5.1 – and there is clarity on: the central importance of considering both operational (or ‘in use’) and non-operational (e.g. embodied) emissions; a focus on an ‘energy hierarchy’ approach to operational emissions; and also the need to focus on heating. For example, the UK Green Building Council (UKGBC) Policy Playbook (2021) explains:

“According to the Climate Change Committee, in order to reach net zero the UK must reduce its emissions from 430 MtCO₂e to around 29 MtCO₂e in 2050. This will require a reduction in the direct emissions from buildings from around 85 MtCO₂e in 2017 to around 4 MtCO₂e in 2050. To achieve this, the Committee has made clear that this will require ‘a new approach that will lead to the full decarbonisation of buildings by 2050’, using a mixture of energy efficiency and low carbon heating measures.” [emphasis added]

Table 5.1: Government’s Ten Point Plan (2020) – ranked by stated emissions savings

Ten point plan	GHG savings 2023-2032 (MtCO ₂ e)
7 Greener Buildings	71
2 Low Carbon Hydrogen	41
8 Carbon Capture, Usage and Storage	40
1 Offshore Wind	21
4 Zero Emission Vehicles	5
5 Public Transport, Cycling and Walking	2
6 Jet Zero and Green Ships	1
9 Natural Environment	-
3 Nuclear Power	-
10 Green Finance and Innovation	-

5.2.49 With regards to operational emissions, there was also important clarity regarding the tightening of Building Regulations to a Future Homes Standard set out in the Net Zero Strategy:

“We will introduce regulations from 2025 through the Future Homes Standard to ensure all new homes in England are ready for net zero by having a high standard of energy efficiency and low carbon heating installed as standard... As an interim measure... we plan to introduce an uplift in standards, effective from June 2022, for England that would result in a 31% reduction in [regulated operational] carbon emissions from new homes compared to current standards.”

5.2.50 The key task for Local Plans, therefore, is to capitalise on this momentum, including by directing new homes to sites with inherent locational built environment decarbonisation opportunities. There is also the possibility of setting local policy to require new buildings to achieve emissions standards that exceed the requirements of Building Regulations and/or specifying how required standards should be achieved (e.g. the extent to which there should be a ‘fabric first’ approach). However, there is a need to avoid stifling innovation and creating a confusing policy environment. See further discussion in Appendix III.

5.2.51 Finally, recent context comes from the RTP/ITCPA *Guide for Local Authorities on Planning for Climate Change* (see www.tcpa.org.uk/planning-for-climate-change) and also a research undertaken by Lichfields (see lichfields.uk/time-to-panic-planning-and-the-climate-emergency) – see Box 5.1.

Box 5.1: Recent context and evidence in respect of built environment decarbonisation

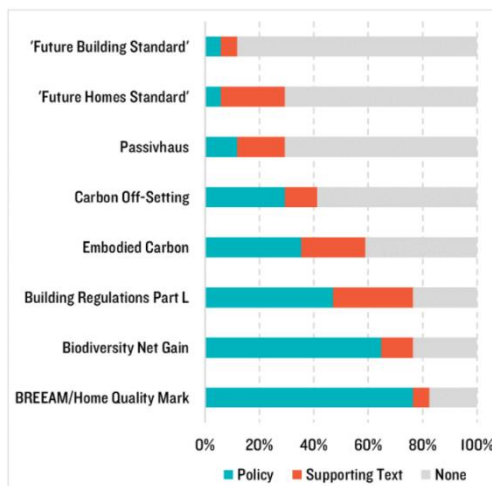
Beginning with the RTPI / TCPA guide, this presents a series of six [basic steps](#) in the section on plan-making. The following is a summary (focusing on mitigation/decarbonisation in particular):

1. Unlock the potential of the local development plan. Ensure that the community is at the heart of the process and that the plan is seen as a key corporate priority in responding to the climate crisis.
2. Understand the legal and policy obligations for action on climate change, including the Sixth Carbon Budget and how these national targets apply to actions that can be controlled or influenced locally.
3. Ensure that there is comprehensive relevant evidence on climate mitigation, and use that evidence to set local carbon reduction targets for the local development plan. Make full use of existing online tools and knowledge partnerships, and seize the digital opportunity to make this evidence accessible to the public.
4. Apply that evidence to assess and then select the policies that are consistent with targets.
5. Use established assessment frameworks to monitor the effectiveness of policy wherever possible, and engage knowledge partners such as higher education institutions to support the analysis of policy impacts.
6. Ensure that whenever a decision is made contrary to plan policy the climate impacts of that decision are fully assessed. Development should not be approved if contrary to targets and objectives.

Beginning with Step 3, it is not clear what form a target for the Local Plan would take' (such that it allows for evaluation and monitoring). Regardless, there is a need to select policies that reflect a level of ambition that reflects the climate emergency (Step 4). Additionally, there is a need to ensure that key decisions taken in respect of spatial strategy and site selection account for decarbonisation as a priority, as discussed. The study also includes a short section on site selection, explaining: *“Reducing the need to travel, connecting to existing heat networks and avoiding areas of flood risk are obvious considerations.”*

With regards to ‘selecting policies’, Lichfields’ research article presents very useful analysis of the percentage of recent Draft Plans identifying named ‘standards’ to address Climate Change in draft policies or in the supporting text of draft policies— see figure. Whilst there is a need for caution around creating a complex and confusing policy environment, there is clear merit to exploring the justification for going beyond the requirements of building regulations and London Plan policy in respect of regulated operational emissions, and also potentially non-operational emissions and unregulated operational emissions. Lichfields conclude:

“... whilst it is not time to panic... planning needs to stand up and be counted in the climate change arena.”



Conclusion on broad distribution issues/options

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

- There are clear arguments for directing housing growth to **Camberley town centre**, both from a perspective of reducing pressure on the Green Belt and countryside beyond the Green Belt (CBGB), but also from a perspective of realising town centre regeneration and decarbonisation opportunities (in respect of both transport and built environment emissions).
- The second sequentially preferable location for growth is clearly the **wider urban area** in the west of the Borough and within the built-up areas of villages, because directing growth here will serve to reduce pressure on the Green Belt and CBGB. No headline strategic opportunities emerge from the discussion above; however, local-level opportunities exist, and are discussed further below in Section 5.4.
- The third sequentially preferable location for growth, in accordance with national policy, is the **CBGB**, with a view to minimising pressure on the Green Belt. There is also a strategic opportunity, in that this part of the Borough is well-connected to the main urban area. However, on the other hand, there is a need to consider the value and sensitivity of the CBGB, both from an environmental perspective (most notably given proximity/links to the TBHSPA) and from a ‘communities’ perspective, in that the countryside here will tend to be accessible or otherwise valued by residents of the western urban area. A high proportion of the CBGB is subject to ‘absolute’ constraint, in that it falls within the TBHSPA 400m buffer, and much of the land outside of the buffer is locally designated as a Site of Importance for Nature Conservation (SNCI).

- The least sequentially preferable broad location for growth in the Borough (aside from areas subject to absolute constraints) is the **Green Belt**. Green Belt release would require demonstration of exceptional circumstances, mindful of the degree to which the land in question makes a contribution to the defined Green Belt purposes and the need to promote “*sustainable patterns of development*” (NPPF para 142). When considering ‘sustainable patterns of development’ there can be the potential to take account of growth opportunities (e.g. provision of community infrastructure to meet a need; or supporting a district or local centre); however, the NPPF emphasises that: “*Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport.*” It is for these reasons, and also mindful of the stretching nature of the Borough’s (adjusted) LHN figure and limited potential supply from non-Green Belt locations, that the Council has undertaken detailed Green Belt Review work, which has included a focus on examining brownfield land and also the transport connectivity of Green Belt sites / land parcels. The Green Belt / edge of Green Belt (Bagshot) settlements are subject to a range of non-Green Belt constraints, including in respect of: TBHSPA proximity, most notably land to the west of Bagshot, West End and Bisley, and land to the north of Chobham; flood risk and sensitive river valley environments (landscape, heritage, access, water quality), including Chobham and land between West End and Bisley; the historic environment, including at Chobham and (land to the west of) Windlesham, but also with valued assets, clusters of assets and historic landscapes elsewhere; transport connectivity, for example, Chobham and Windlesham have relatively poor bus connectivity; and road infrastructure, e.g. the A319/A3046 junction within Chobham village centre conservation area is sensitive, and another clear consideration is use of the M3 for local journeys (‘junction hopping’). There are no clear and obvious strategic growth opportunities, but potentially some that might be explored further, e.g. in respect of access to a primary school and strategic planning for green and blue infrastructure.
- Another broad locational consideration relates to the matter of concentrating growth at ‘**strategic**’ sites versus dispersing growth across smaller sites, where strategic sites are those with a housing capacity in the several hundreds or thousands, and associated with economies of scale that enable delivery of a good mix of uses (also a good mix of homes in terms of type, size and tenure), potentially to include employment land, and/or enable delivery of new or upgraded strategic infrastructure. Growth scenarios with a focus on one or more strategic sites can tend to be associated with a range of benefits, for example from a perspective of infrastructure capacity, place-making and decarbonisation. However, strategic sites also give rise to a range of issues, including delivery risk, e.g. because of required infrastructure. Strategic growth options in the Surrey Heath context are relatively limited (e.g. in comparison to nearby Wokingham Borough, see Section 5.3 of the recent Interim SA Report available [here](#)), aside from the opportunity within Camberley Town Centre. However, one new settlement option exists, in the form of Fair Oaks Airport, which has been introduced above and is discussed further below.
- Regardless of whether there is support for one or more strategic sites, there is a need to support a **mix of site types and a degree of dispersal** (mindful of the settlement hierarchy) in order to ensure a robust housing supply trajectory (thereby maintaining a five year housing land supply, as measured against the housing requirement) and meet very local housing needs (albeit these are unquantified).
- There is also a need to consider sites suited to meeting **wider needs**, including for employment land (informed by the Employment Land Technical Paper Update, as discussed above), Gypsy and Traveller and Travelling Show People pitches/plots and sites (informed by the Accommodation Assessment) and specialist housing (informed by the Housing Needs Assessment).

5.2.53 This list does not aim to be comprehensive, with wide-ranging other strategic spatial factors that can and should feed into work to define reasonable growth scenarios, for example in terms of:

- transport connectivity - particularly by public and active transport;
- decarbonisation - a priority issue nationally and locally;
- community infrastructure - albeit there are no headline issues/opportunities, e.g. schools capacity;
- avoiding biodiversity constraints - SANG capacity is a key issue, but there are wide ranging other issues relating to heathland and other habitat areas / networks;
- historic settlement pattern and the wider historic environment - informed by key designations;
- landscape and sense of place - informed by the Landscape Character Assessment); and
- the water environment - informed by the Water Cycle Study, 2017.

5.2.54 However, the above list is considered to provide a useful ‘top-down’ input into the process.

5.3 Site options

- 5.3.1 The primary mechanism for considering site options in isolation is the Strategic Land Availability Assessment (SLAA) led by SHBC Officers, which assessed a total of 113 sites identified through a Call for Sites and targeted correspondence with landowners (informed by a Countryside Capacity Study, which examined land parcels within the CBGB). Another important input was the range of past and ongoing detailed workstreams examining issues and options for Camberley Town Centre, which are feeding in not only to the SLAA and Local Plan, but also a forthcoming corporate Camberley Town Centre Strategy.
- 5.3.2 The SLAA places all (non-permitted) site options into one of three categories in line with the NPPF:¹⁸
- Deliverable (able to deliver in the first five years of the plan period) – a total of 10 site options are identified as deliverable, with a total identified capacity of 295 homes.
 - Developable (able to deliver in the latter years of the plan period) – a total of 44 site options are identified as deliverable, with a total identified capacity of 2,178 homes.
 - Discounted – sites judged not to be deliverable or developable.
- 5.3.3 With regards to the deliverable and developable sites, there is *relatively* limited need to scrutinise the conclusions of the SLAA through the appraisal of reasonable growth scenarios. The stretching nature of the housing requirement options discussed in Section 5.2, combined with an understanding of the extent of environmental and policy constraints affecting the Borough, serves to indicate little reasonable need to test the option of not 'supporting' any of these sites through the Local Plan (N.B. the plan will only 'allocate' larger sites). Nevertheless, all deliverable and developable SLAA sites are discussed in Section 5.4, before reaching a final conclusion on whether they should be a 'constant' (i.e. feature in all scenarios) or a 'variable' (i.e. feature under some scenarios but not others) across the reasonable growth scenarios.
- 5.3.4 With regards to discounted sites, 28 of these are discounted on account of being located within the Green Belt, and these sites do warrant close scrutiny, mindful of the stretching nature of the housing requirement options. All discounted Green Belt sites are introduced and briefly discussed in Section 5.4, with a view to identifying those that should be progressed to Section 5.5 and, in turn, explored through the appraisal of reasonable growth scenarios. One of the discounted Green Belt sites has the potential to deliver a new settlement and so warrants particular scrutiny, namely Fair Oaks Airport (Site 890). All other Green Belt sites are relatively small, in that they do not have the potential to deliver a 'strategic' scheme (see definition at paragraph 5.2.50, above). When discussing non-strategic Green Belt sites in Section 5.4, there is a clear focus on sites that relate well to an existing settlement, in that they are within circa 50m.
- 5.3.5 With regards to discounted sites outside of the Green Belt, these are discounted for clear cut planning reasons (availability concerns; location within the 400m TBHSPA buffer zone; location within an existing of planned SANG; and complete coverage by an area Tree Preservation Order, TPO), such that they do not require discussion in Section 5.4. However, two sites warrant being highlighted here:
- Site 904 (Land at Kings International College, Watchetts Drive, Camberley) - is discounted for more complex reasons. The proposal requires the redevelopment of some school buildings, which relies on reaching a quantum of residential development (approximately 280 units based on the Call for Sites submission), which generates viability concerns given suitability issues. Specifically, there are a number of suitability issues relating to design and constraints (e.g. flood risk and loss of playing pitches).
 - Site 830 (Land at Pine Ridge Golf Course, Deepcut, or 'Pine Ridge') – is currently unavailable, but is notable for having the potential to deliver a strategic urban extension – discussed further in Box 5.2.
- 5.3.6 Finally, as a means of providing supplementary evidence on site options, **Appendix V** presents the findings of an AECOM-led quantitative GIS-based exercise, involving examining the spatial relationship between all site options and a range of constraint/push (e.g. biodiversity designations) and opportunity/pull (e.g. schools) features for which data is available in digitally mapped form for the Borough as a whole. The limited nature of the analysis is such that it does not enable overall conclusions to be reached on the merits of each site (unlike the SLAA); however, it is nonetheless a useful input to Section 5.4.

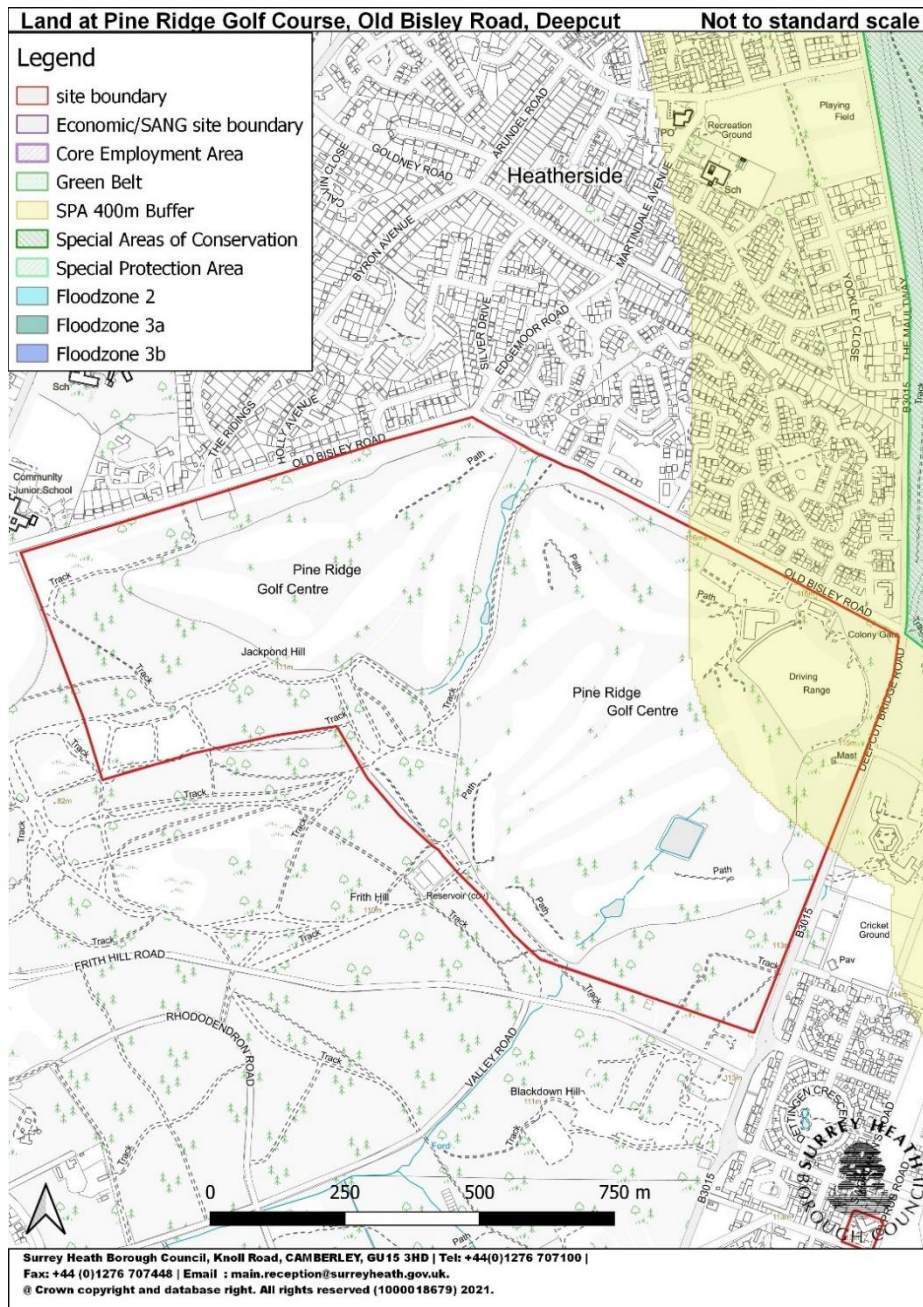
¹⁸ Paragraph 68 states: “Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of: a) specific, deliverable sites for years one to five of the plan period; and specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.”

Box 5.2: Discussion of Pine Ridge

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

A large site covering the entirety of the golf course and the majority of the wider Frimley Fuel Allotments was submitted, by a developer, as part of the Call for Sites 2020/21 and included proposals for up to 900 homes and a Bespoke SANG, supported by a Vision Document. The site was assessed as discounted in the SLAA 2021 as a result of the freehold owner (Trustees of Frimley Fuel Allotments) confirming that the site was not available for development at this time. As such, no capacity assessment was made as part of the SLAA 2021.

Whilst the site is currently unavailable for development, it could have potential to deliver a strategic urban extension to Frimley and provide large areas of SANG, subject to more detailed considerations surrounding site constraints and the local context. If, at a future date, the site were to be confirmed as available for development, its location within the Countryside beyond the Green Belt, and adjacent to the main urban area, serves to indicate that the option of growth here would be sequentially preferable to the option of Green Belt release.



5.4 Sub-area scenarios

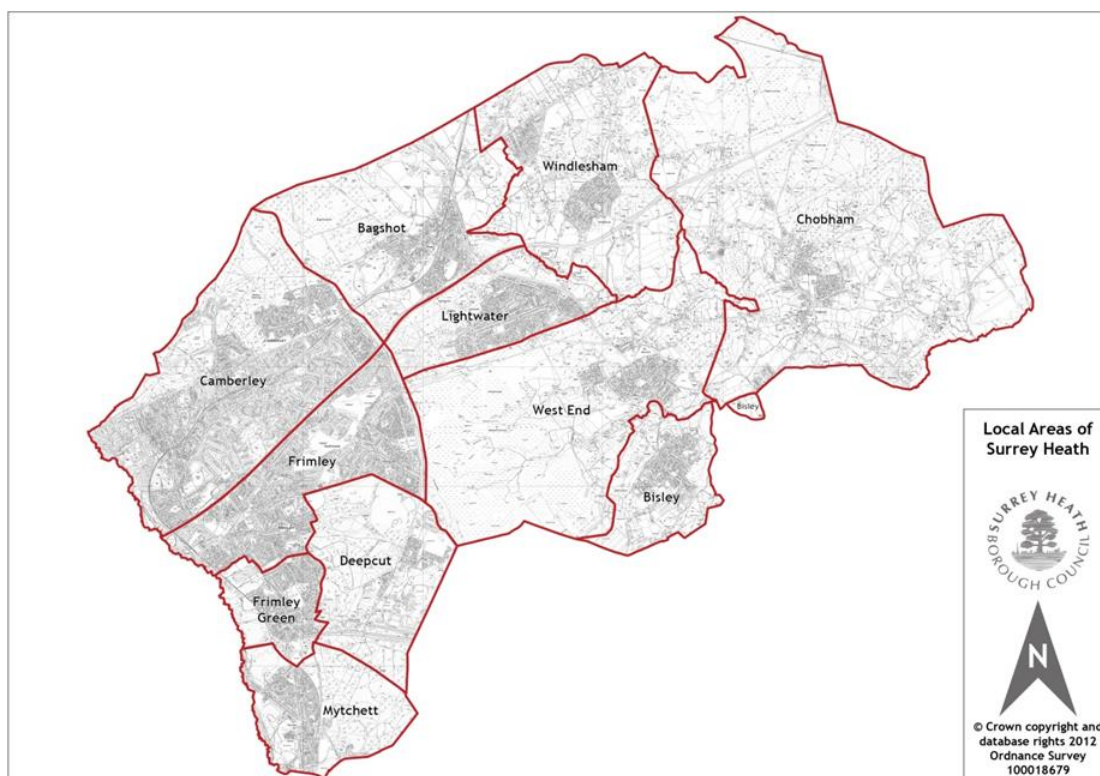
Introduction

5.4.1 Discussion has so far focused on A) 'top down' considerations of housing quantum and broad distribution issues and options; and B) 'bottom-up' consideration of site options. The next step is to consider each of the Borough's sub-areas in turn, exploring how sites might be allocated/supported in combination.

What sub-areas?

5.4.2 There are eleven quite well-established sub-areas within the Borough – see Figure 5.6. Evidenced views on potential adjustments to these sub-areas would be welcomed through the current consultation.

Figure 5.6: Borough sub-areas



Structure of this section

- 5.4.3 The sub-areas are discussed in alphabetical order, with each discussion structured under four headings:
- Completions and commitments – i.e. homes delivered since the start of the plan period, or set to come forward at sites with planning permission.
 - SLAA sites – the aim is to briefly discuss sites identified by the SLAA as deliverable or developable;
 - Discounted sites – the aim is to identify sites discounted by the SLAA that warrant being taken forward to Section 5.5 and, in turn, detailed consideration through appraisal of reasonable growth scenarios;
 - Conclusions – the aim is to conclude on sub-area scenarios to progress to Section 5.5.

A note on methodology

5.4.4 The aim here is not to present an appraisal of reasonable alternatives, but rather to discuss site and sub-area options in order to inform the definition of reasonable alternatives (borough-wide growth scenarios). The discussions are systematic (see above), but discretion and planning judgment is applied.

5.4.5 This approach is taken mindful of the fundamental legal requirement, which is to explain reasons for arriving at reasonable alternatives (which we define as growth scenarios; see Section 4) in "outline" terms only. Views on the approach taken are welcomed through the current consultation, including evidenced views on sub-area scenarios that might be the focus of detailed appraisal.

Bagshot

Completions and commitments

- 5.4.6 There have been 48 completions since the start of the plan period, and 236 homes have permission. One of these sites (134 and 136 London Road) only has *outline* permission, such that it warrants allocation.

SLAA sites

- 5.4.7 The SLAA identifies eight sites with a total capacity of 134 homes, of which one is large enough to warrant allocation, namely **Site 247** (Bagshot Depot and Archaeology Centre, London Road; 50 homes).

- 5.4.8 This site is in public sector ownership, comprises PDL within the settlement boundary and benefits from excellent proximity to a rail station. There are suitability issues relating to the historic environment (adjacent Bagshot Park, also an onsite locally listed building) and the two adjacent a-roads (the A30 and the dual carriageway A322), plus further work is required to confirm access arrangements, and there is a need to relocate the existing operational depot onsite (such that delivery is assumed in years 6-10 of the plan period). However, on balance, this site can reasonably be progressed to Section 5.5 as a site that should feature as an allocation for 50 homes across all the reasonable growth scenarios (i.e. a 'constant').

- 5.4.9 The remaining seven sites comprise three clusters. Firstly, **Sites 317, 320 and 714** are located at or close to the northern edge of the historic core, in proximity to both the district centre and the rail station:

- All three are currently in employment use, however: Site 714 has prior approval for conversion to residential under permitted development rights;¹⁹ Site 317 has been identified as not warranting a formal employment designation;²⁰ and at Site 320 the proposal is to retain employment uses.
- Site 320 is located to the west of the A30 and adjacent to Bagshot Park.
- Sites 317 and 320 are located in a flood risk zone.

- 5.4.10 Secondly, **Site 448** is located at the southern extent of the village, outside of the current settlement boundary, but with the potential to fall within a redrawn boundary. The site comprises an existing house with a degree of historic character (shown on the pre-1914 OS map; adjacent to a locally listed public house) in a large plot comprising mature trees/vegetation (though no TPOs) adjacent to woodland (priority habitat, TPOs and council owned, but not a SNCI and not accessible as open greenspace).

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

- Accessibility – given a distance of over 1km to the district centre, although there is a cycle path along the A30, and also potentially good bus connectivity.
- Woodland - Site 408 comprises woodland shown on the pre-1914 OS map, and around half is shown as priority habitat by the nationally available dataset (magic.gov.uk).
- Rural character – there is a concern regarding intensification of built form in a sensitive part of the countryside between settlements, also mindful of nearby Site 448. However, it is noted that a low density is proposed for all three sites (albeit a primary aim is to buffer the railway line). Also, the extent of woodland and SANG in this broad area serves to suggest limited risk of 'sprawl' in the long term.

Discounted sites

- 5.4.12 Two are within the CBGB, to the south of the village, and two are located in the Green Belt, to the east.

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

¹⁹ The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2013 introduced new 'permitted development rights' which allow for the change of use from an office building to residential without requiring planning permission. Approval is subject to a prior notification process, covering significant transport and highway impacts, development in safety hazard zones, areas of high flood risk and land contamination. The rights were made permanent in April 2016.

²⁰ The Employment Land Review (2016) did not recommend allocation as a Strategic or Locally Important Employment Site.

- 5.4.14 Of the two sites in the Green Belt, **Site 812** can be immediately ruled out on account of being unavailable (also distant from the settlement boundary and within a flood risk zone). With regards to **Site 736**, which is located to the north of the village, the site is not adjacent to the settlement boundary and, indeed, is separated from the village by the A332; however, it is marginally within 50m of the settlement boundary, which is a threshold distance at which a site is judged to relate suitably well to the settlement, such that it warrants further consideration (as discussed in Section 5.3). There are a range of issues and constraints, but no absolute constraints that serve to rule the site out of contention at this stage in the process.

Conclusion

- 5.4.15 On the basis of the above discussion (also mindful of discussion within Sections 5.2 and 5.3), there are **two reasonable growth scenarios** for Bagshot (over-and-above completions/commitments):
- 1) 134 homes across the eight SLAA sites; and
 - 2) Scenario 1 plus an allocation necessitating Green Belt release (see Section 5.5).
- 5.4.16 With regards to lower growth – i.e. a scenario involving removing or revising down the capacity of one or more SLAA sites – this warrants consideration, given issues with certain sites (see further appraisal in Section 9), but there is no reasonable need to formally progress a lower growth scenario to Section 5.5, mindful of the stretching nature of the potential housing requirement figures discussed in Section 5.2, and given that Bagshot is a well-connected village that benefits from a district centre. 418 homes does not necessarily amount to a ‘high growth’ strategy for a village such as Bagshot.

Bisley

Completions and commitments

- 5.4.17 There are no existing completions or commitments at Bisley.

SLAA sites

- 5.4.18 The SLAA identifies three sites for a total of 32 homes, namely **Sites 236, 573 and 763**. All are small sites (6, 17 and 9 homes respectively) and within the settlement boundary, but considerations include:
- Accessibility – Sites 236 and 573 are located near to the southern extent of the settlement, around 800m from the neighbourhood parade located near to the northern extent of the village.
 - Townscape and character – Site 236 comprises land to the rear of three or four homes potentially with a degree of historic character, although none are locally listed and they are not shown on the pre-1914 OS map. The proposal is to support a high density scheme of approximately 80 dph.
 - Employment – Site 573 is currently a light industrial site, although the site has previously been granted planning permission for residential redevelopment.

Discounted sites

- 5.4.19 The five discounted sites are all located within the Green Belt, with one site unavailable such that it can be ruled out at this stage in the process, namely **Site 741**. With regards to the remaining four sites, namely **Sites 740, 800, 902 and 903**, all warrant being taken forward for further consideration within Section 5.5. This is because: all are either adjacent (three of the four sites) or within 50m (one of the five sites) of the settlement boundary; and, whilst there are a range of issues, none of the sites are associated with absolute constraints that enable the option of allocation to be ruled out at this stage in the process.

Conclusion

- 5.4.20 There are **two reasonable growth scenarios** for Bisley:
- 1) 32 homes across the three SLAA sites; and
 - 2) Scenario 1 plus one or more allocations necessitating Green Belt release (see Section 5.5).
- 5.4.21 There is limited argument for exploring lower growth (i.e. a scenario involving removing or revising down the capacity of one or more SLAA sites), including because total housing growth of 32 homes in the plan period amounts to a low growth strategy (albeit Bisley is closely associated with West End and Woking).

Camberley town centre

Completions and commitments

- 5.4.22 Data on completions and commitments is available only for Camberley as a whole. Specifically, there have been 218 completions since the start of the plan period, and 498 homes have full permission.

SLAA sites

- 5.4.23 The SLAA identifies five sites with a total capacity of 1,273 homes, namely **Sites 25, 27, 721, 814 and 921**. In each case the primary question for consideration here relates to development density, as opposed to the question of whether the site is suitable for redevelopment. Taking each of these sites in turn:

- Site 25 (Camberley Station) - the Camberley Town Centre AAP allocation indicates 50+ units at the site. However, a 75 home mixed use scheme is now considered appropriate, with the SLAA explaining:

“Overall, taking account of the sustainable town centre location at Camberley train station and nearby buildings that are in excess of 4 storeys, the site is considered to have a capacity for a minimum of 75 units. Camberley Station is located in the town centre of Camberley, just around the corner from the High Street. Due to the strategic importance of the site, being used by rail passengers, its central location and the potential for redevelopment of the larger area, including major regeneration sites on the other side of Pembroke Broadway, the station site is considered to be a key regeneration site in the Borough...”

- Site 27 (Land east of Knoll Road) – is a key strategic site, located within the Eastern fringe of Camberley Town Centre. There are a wide range of issues and opportunities, which are a focus of discussion in Section 9 of this report, and it is expected that the allocation will generate interest and comment through the current consultation. AECOM and SHBC Officers discussed the possibility of defining and appraising growth scenarios specific to this site (e.g. in the form of alternative development quanta), but ultimately determined that reasonable scenarios could not be identified.
- Site 721 (Central House, 75-79 Park Street) – is a small site at the southern extent of the primary shopping area (as currently defined). The SLAA supports 6 homes, as per an expired planning permission.
- Site 814 (London Road Block) – is a second key strategic site, located south of the A30 London Road on the edge of the Town Centre. As per Site 25, issues and opportunities are explored in detail in Section 9, and evidenced views on reasonable alternative scenarios would be welcomed through this current consultation.
- Site 921 (Land east of Park Street, north of Princess Way) – is located centrally within the primary shopping, and is currently occupied by House of Fraser. The SLAA explains that *“surrounding densities [are] in excess of 200 dph. With an additional storey, 120 units is considered achievable at the site.”*

- 5.4.24 A further site for consideration is **Site 865** (84-100 Park Street), which is located at the south west fringe of the town centre. This site has permission for 61 sheltered apartments, and so does not appear within the SLAA, but is now considered suitable for a revised, residential (C3) development scheme (61 homes).

Discounted sites

- 5.4.25 There are three discounted sites, namely **Sites 250, 1002 and 1003**; however, two are discounted due to availability concerns, whilst the third is below the SLAA size threshold.

Conclusion

- 5.4.26 There are clearly a range of important strategic considerations (issues and opportunities) that must factor into planning for Camberley town centre. As such, there is an argument for defining and appraising growth scenarios. However, at this current stage no reasonable growth scenarios are readily apparent, such that it is reasonable to progress just **one growth scenario** to Section 5.5, namely a scenario involving support for the five SLAA sites, plus Site 865, for a total of 1,226 homes. Evidenced views on reasonable growth scenarios would be welcomed through the current consultation.

Camberley wider urban area

Completions and commitments

5.4.27 Data on completions and commitments is available only for Camberley as a whole. Specifically, there have been 218 completions since the start of the plan period, and 498 homes have full permission.

SLAA sites

5.4.28 The SLAA identifies 12 sites with a total capacity of 265 homes, namely **Sites 21, 49, 240, 295, 314, 424, 717, 801, 832, 833, 877 and 878**. N.B. Sites 21 and 801 are proposed for C2 older persons accommodation, and so equivalent C3 capacity is assessed at 1 dwelling for every 1.94 bedrooms, in accordance with PPG and local evidence on household occupancy rates within Surrey Heath.

5.4.29 All of these are small sites, but give rise to considerations including:

- Employment – most notably, Sites 296 and 878 are both strongly associated with an existing employment area. Also, Site 314 comprises a builders merchants and Sites 717 and 721 comprise hotels.
- Community uses – Site 240 currently comprises the Camberley Centre, which is an adult education centre. The existing use of an adult education centre would either need to be retained and incorporated as part of any future development, or relocated in an equally accessible location.
- Historic environment – Site 240 includes a locally listed building, with the SLAA explaining “... *the site benefits from the Camberley County First School building, a local heritage asset, which strongly contributes to the ambience and attraction of the place. The building and its setting should be retained and form the focal core of the site in a heritage-led regeneration scheme, making sustainable use of the historic building.*” The SLAA goes on to explain: “*If the locally listed building [was] to form part of the proposed development, a higher capacity could be achieved at the site.*”
- Noise – two sites (Sites 314 and 878) are adjacent to the railway line.
- Flood risk – one site (Site 878) is located in flood risk zone 2.
- TPOs – one site (717) is covered by an area TPO. Also, Site 801 is described as being located in an area with “*vigorous hedge boundaries which contribute to the verdant street scene character.*”
- Greenspace – Site 424 comprises non-designated amenity greenspace associated with a block of flats, including mature trees.
- Car parking – Site 833 comprises a car park and adjacent Site 49 comprises garages.
- Townscape / character – Site 877 is an existing single dwelling on a large plot proposed for eight homes.
- Combined scheme – Sites 49, 424 and 833 are adjacent, with a combined identified capacity of 49 homes.

Discounted sites

5.4.30 There are seven discounted sites in total, of which four are small sites ruled out due to availability concerns, namely **Sites 6, 246, 500 and 804**. The remaining three sites are:

- **Site 37** – comprises an area TPO, also partly priority woodland habitat.
- **Site 802** – comprises an area TPO.
- **Site 904** – is discounted due to suitability and viability concerns. The site comprises Kings International College, and has been discussed above, in Section 5.3.

Conclusion

5.4.31 Whilst there are choices to be made, including in respect of development densities and use mixes at certain of the SLAA sites, on balance it is reasonable to progress just **one growth scenario** to Section 5.5, namely a scenario that sees support for the 12 SLAA sites for a total of 266 homes.

Chobham

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

Completions and commitments

5.4.33 There have been 52 completions since the start of the plan period, and 14 homes have permission.

SLAA sites

5.4.34 The SLAA identifies three sites with a total capacity of 114 homes, of which one is large enough to warrant an allocation in the Local Plan, namely **Site 447** (Chobham Rugby Club, Windsor Road), which has a capacity of 91 homes. The site includes some PDL, and SLAA explains “*development is dependent on the relocation of the existing recreational use. It has been advised that a new location has been sought, but until this can be fully established, the site is phased in the medium term... The capacity indicated in the submission is relatively low in density and therefore it is considered that there is scope for the retention of green space and possible incorporation of additional green infrastructure on site.*”

5.4.35 The other two sites identified as having capacity by the SLAA are also of note.

- **Site 548** – is located outside of the proposed Green Belt inset boundary. However, the site is partially PDL, such that some development could take place without Green Belt release. Further considerations relate to flood risk and historic environment / landscape, recognising that the Chobham conservation area is adjacent, and the main building on the site is shown on the pre-1914 OS map.
- **Site 1001** – is a PDL site comprising the Chobham Club. The SLAA explains: “*... redevelopment of this site would need to incorporate the adequate re-provision of the existing use on-site, or demonstrate that there is no need to do so through the planning application process. The previous planning application sought to re-provide the community facility use on-site.*” It is located adjacent to Site 447.

Discounted sites

5.4.36 There are a total of 15 discounted sites, all of which are currently located in the Green Belt and will remain so if and when Chobham is inset. However, nine of these sites can be ruled out at this stage for clear cut reasons, namely **Sites 409, 414, 510, 543, 835, 843, 751, 917 and 919**. Specifically: six of these are beyond 50m of the draft inset boundary (plus Sites 543 and 917 are within the TBHSPA 400m buffer zone); Sites 409 and 510 are entirely or mostly within flood risk zone 3; and Site 751 (which comprises land adjacent to Longcross Garden Village; see the [Runnymede Local Plan](#)) is within the SPA buffer.

5.4.37 With regards to the remaining six sites:

- **Site 923** (Fairoaks Airport) – has already been introduced above, as a site that is being proposed for a Garden Village, and the only strategic growth option open to the Local Plan, outside of Camberley town centre. At this stage it is important to note that a planning application for a 1,000 homes scheme was submitted in 2018 (ref. [18/0642](#)), before the planning application was withdrawn in February 2020.
- **Sites 238, 546, 597, 916 and 918** - there are a range of issues and constraints, but no absolute constraints that serve to rule the site out of contention.

5.4.38 Finally, there is a need to consider **Site 548** in detail. As explained within the SLAA, there are three parts to the site, and the SLAA identifies one of these as having capacity, due to the potential for development without Green Belt release. However, for the purposes of exploring reasonable higher growth scenarios it is reasonable to explore the possibility of more extensive development within the site boundary.

Conclusion

5.4.39 There are **three reasonable growth scenarios** for Chobham (above completions/commitments):

- 1) 114 homes across the three SLAA sites; and
- 2) Scenario 1 plus one or more allocations necessitating Green Belt release (outside of the currently proposed GB inset area; see Section 5.5).
- 3) Scenario 1 plus Fairoaks Garden Village (see Section 5.5).

5.4.40 With regards to the possibility of a lower growth scenario – see discussion in Appendix IV.

Deepcut

Completions and commitments

5.4.41 There have been 118 completions since the start of the plan period, and 1,113 homes have permission.

SLAA sites

5.4.42 The SLAA identifies eight sites with a total capacity of 138 homes.

5.4.43 One of the sites identified as having capacity by the SLAA is large enough to warrant an allocation in the Local Plan, namely **Site 552** (Land at Frimhurst Farm, Deepcut Bridge Road), which has an identified capacity of 65 homes. A low development density is proposed, to take account of the adjacent railway and Basingstoke Canal (SSSI and conservation area) and tree coverage. There are also access challenges, with the SLAA explaining: *“Existing access... is at a point where the road reduces to a single lane over a railway bridge, on a slight bend. Consultation with... SCC would need to take place regarding the safety of access, if it were to be upgraded, which may impact the delivery of the site.”*

5.4.44 The following bullet points consider the remaining seven sites in turn:

- **Site 504** – the SLAA explains that the capacity has been reduced from 11-17 homes to five homes, to account for *“wooded character and low surrounding densities.”*
- **Site 757** – the SLAA explains that the capacity has been reduced from 52 homes to 21 homes, to account for the *“irregular shape, areas of detachment, countryside location [and] group TPO on site.”* It is also noted that the railway is adjacent, and that part of the site falls within the TBHSPA 400m buffer. Furthermore, removal of trees and vegetation may be necessary to achieve safe access. The SLAA also explains: *“Much of the site consists of relatively dense, mature woodland.”*
- **Site 846** – is a small previously developed site that gives rise to few issues.
- **Site 887** – the SLAA explains: *“The site currently comprises two dwellings surrounded by significant woodland. The site is 4.32 ha in total. However, an area covering 2ha of the site is indicated as the part of the site that is suitable for development... The woodland strongly contributes to the character and local distinctiveness of the area... The deep woodland belt is characterised by only a few individual residential properties with large plot sizes, all surrounded by woodland.”*

There are also issues with access, with the SLAA explaining *“the existing access is via a narrow track/driveway, which does not allow two vehicles to pass... Therefore, substantial improvement would be required to make this access safe and suitable to serve the proposed development.”*

The SLAA then concludes: *“The current proposal is for 60 – 90 units. However, the SLAA capacity for the site is derived from the existing footprint from the development on-site, to ensure that the proposals would be sensitive to the character of the area.”*

- **Site 920** – is a wooded site and also notably adjacent to a woodland SNCI. The SLAA concludes: *“Development of the site at 30dph would provide 95 dwellings. Due to the site’s heavily wooded character and location within an area of countryside that provides a gap between settlements, it is considered that capacity would need to be reduced, to retain woodland areas, and reflect the rural character of the locality. Accordingly, titles comprising wholly undeveloped woodland without residences or other buildings are deducted from the total site area, when taking account of capacity calculations... A capacity of 17 dwellings is derived, applying a lower threshold of 10dph to the remaining 1.7ha area, having regard to the rural, densely wooded character of the site.”*
- **Sites 922 and 926** are adjacent sites adjacent to Frimley Green, within the CBGB. The submitted capacity of the two sites is up to 20 homes, but the SLAA supports 10 mindful of *“countryside designation, the limited existing built form and small size and surrounding low densities.”*

Discounted sites

5.4.45 There are five discounted sites in total, of which two are ruled out due to availability concerns (**Sites 378 and 830**) and two are below the SLAA site size threshold (**Sites 906 and 923**). The final site (**Site 836**) is also ruled out for quite clear cut reasons, with the SLAA explaining: *“The site comprises part of the SANG that is in place to mitigate the impacts of the Princess Royal Barracks development.”*

N.B. see stand-alone discussion of Site 830 in Box 5.1, above.

Conclusion

- 5.4.46 On the basis of the discussion above it is evident that, in addition to a scenario involving support for the eight SLAA sites, there is potentially merit to exploring a lower growth scenario involving removing or revising down the capacity of one or more SLAA sites. This is on the basis of the extent of woodland constraining this area, as well as an understanding that this area is set to see high growth over the plan period due to the committed Princess Royal Barracks scheme building-out. However, there is no way to easily define a lower growth scenario (including noting that site capacities have already been revised down from call for sites submissions) and the total number of homes involved is small. As such, and on balance, it is reasonable to progress just **one growth scenario** to Section 5.5, namely a scenario involving support for the eight sites identified by the SLAA for a total of 138 homes.

Frimley

Completions and commitments

- 5.4.47 There have been 51 completions since the start of the plan period, and 107 homes have permission.

SLAA sites

- 5.4.48 The SLAA identifies three sites with a total capacity of 260 homes, including one site proposed for C2 older persons accommodation.
- 5.4.49 One of the SLAA sites is large enough to warrant an allocation in the Local Plan, namely **Site 907** (Sir William Siemens Square, Chobham Road). The SLAA concludes: *“The Council’s urban design officer has undertaken an assessment of the site and has determined the capacity of approximately 200 dwellings as appropriate for the site. This takes account of the existing context of the site and that the whole site may not be developed due to its current status as an employment site.”* The SLAA also explains: *“The site is sustainably located, within 1km of Frimley train station and approximately 2km south of Camberley Town Centre. There is good access to local services, schools and recreation space.”*
- 5.4.50 Of the remaining two sites, **Site 882** is a small previously developed site that gives rise to few issues. However, **Site 837** is more notable, as this comprises former playing fields. The SLAA explains:

“A workable solution for the green space designation and the TPO trees that bound the site will be required. The capacity for the site has been reduced due to the need to find a workable solution and give consideration for the protected trees that border the site, and this could impact on the viability of the proposed extra care use. A long-term solution for the retention of existing trees and the possibilities to retain and incorporate some of the greenspace within a future scheme would be required. The capacity has also been decreased due to the potential urbanising influence of a large building in this location... The site has been resubmitted for 64 extra care apartments... However, the density has been decreased due the green space and TPO designations, with the site assessed as having capacity for 20 C2 units.”

Discounted sites

- 5.4.51 There is only one discounted site, namely **Site 566**, which is discounted due to availability concerns.

Conclusion

- 5.4.52 Whilst there are choices to be made, perhaps most notably in respect of Site 882, on balance it is reasonable to progress just **one growth scenario** to Section 5.5, namely a scenario that sees support for the three sites identified as having capacity by the SLAA for a total of 215 homes.

Frimley Green

Completions and commitments

- 5.4.53 There have been no completions since the start of the plan period, but 23 homes have permission.

SLAA sites

- 5.4.54 The SLAA identifies capacity at two sites for a total of 177 homes.
- 5.4.55 Firstly, **Site 329** is an existing employment site located next to Frimley Green local centre, proposed for a relatively high density scheme comprising 17 homes.

5.4.56 Secondly, **Site 557** is a larger site located between the defined settlement areas of Frimley Green and Mytchett. It is located on land designated countryside beyond the Green Belt, and its location between settlements leads to a degree of sensitivity, but it is predominantly previously developed, and is well contained by two railway lines (leading to a degree of noise pollution concern) and the railway and the B3411. A further consideration is the near adjacent church, although the church is only grade 2 listed. Importantly, the site now has planning permission (subsequent to the SLAA base date) and is able to deliver in the first five years of the plan period.

Discounted sites

5.4.57 The three discounted sites - **Sites 195, 299 and 512** - are all discounted due to availability concerns.

Conclusion

5.4.58 There appears to be relatively little in the way of strategic choice at Frimley Green, recognising that Site 557 now has planning permission. As such, it is reasonable to progress just **one growth scenario** to Section 5.5, namely a scenario that sees support for the two SLAA sites for a total of 177 homes.

Lightwater

Completions and commitments

5.4.59 There has been one completion since the start of the plan period, and two homes have permission.

SLAA sites

5.4.60 The SLAA identifies one site for 17 homes, namely **Site 908**. The SLAA explains: *“The site was submitted for between 31 - 50 units. The site is PDL in the settlement area with no major constraints. Surrounding densities approximately 30-35dph, but as the site contains substantial built form and is close to Lightwater Local Centre, partial flatted development could be considered. The site is therefore identified for 17 units.”*

Discounted sites

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

Conclusion

5.4.62 There appears to be little in the way of strategic choice at Lightwater. The village is set to see low growth over the plan period, but this reflects the extent of environmental constraint, with the TBHSPA abutting two sides of the village, and the third side defined by the A322 with the Windle Brook corridor beyond (associated with extensive woodland and a cluster of listed buildings). As such, it is reasonable to progress just **one growth scenario** to Section 5.5, involving support for the one SLAA site for 17 homes.

Mytchett

Completions and commitments

5.4.63 There has been eight completions since the start of the plan period, and 254 homes have permission.

SLAA sites

5.4.64 The SLAA identifies capacity at two sites for a total of 23 homes, namely:

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

Discounted sites

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

Conclusion

- 5.4.66 On the basis of the discussion above it is evident that, in addition to a scenario involving support for the two SLAA sites, there is potentially merit to exploring a lower growth scenario involving removing or revising down the capacity of one or both SLAA sites. This reflects the importance of careful planning for the Blackwater Valley as a key green and blue infrastructure asset, and sensitive part of the Borough from a climate change resilience perspective. However, there is no way to easily define a lower growth scenario, and the total number of homes involved is small. As such, and on balance, it is reasonable to progress just **one growth scenario** to Section 5.5, namely a scenario that sees support for both SLAA sites for a total of 23 homes.

West End

Completions and commitments

- 5.4.67 There have been 220 completions since the start of the plan period, and 20 homes have permission.

SLAA sites

- 5.4.68 The SLAA identifies four sites with a total capacity of 96 homes, of which one is large enough to warrant an allocation, namely **Site 178** (Land east of Benner Lane), which has a capacity of 73 homes, and would expand a recently completed large scheme. A high proportion of the site comprises priority woodland habitat. However, the SLAA explains that the site is allocated as a housing reserve site in the Local Plan (saved policy H8). The scheme would complete the expansion of West End to the east as far as the Green Belt, and a primary school is adjacent, although West End local centre is over 500m distant.

- 5.4.69 With regards to the final three sites:

- **Site 153** – is located within the Green Belt, but the SLAA explains: “... *there could be scope for limited development on... part of the site... providing it would have no greater impact than the existing development on the openness of the Green Belt.*” The SLAA goes on to explain: “*It is advised that the site as a whole could accommodate 74 units. However... it is considered the site could accommodate 7 net residential units.*”

- **Site 799** – is a notably sensitive site. The SLAA explains:

“The site is PDL and wholly within the Green Belt... The northern extent of the site is within flood zone 3 and the remaining area is entirely within flood zone 2. The site forms part of a wider gap between the settlements of West End and Bisley [and the] site falls partly within a Biodiversity Opportunity Area...

... The site... has existing structures present. As such, there could be scope for limited development on this area of the site... providing it would have no greater impact... on the openness of the Green Belt.”

... The submission advised that the site could have a capacity of 60 dwellings. However... the estimated capacity has been reduced to 6.”

- **Site 840** – is a small site for ten homes adjacent to Site 178, and give rise to limited issues.

Discounted sites

- 5.4.70 There are total of five discounted sites, all of which are located in the Green Belt. However, two of these sites - namely **Sites 374** and **914** - can be ruled out at this stage due to being poorly related (beyond 50m) to the settlement boundary (once account is taken of a potential expanded boundary to reflect Site 178).

- 5.4.71 With regards to the remaining two sites – **Sites 813** and **913** - there are a range of issues and constraints, but no absolute constraints that serve to rule the site out of contention at this stage in the process.

- 5.4.72 Finally, there is a need to further consider **Sites 153** and **799**. The SLAA identifies capacity for limited development without Green Belt release. However, for the purposes of exploring higher growth scenarios it is reasonable to explore the possibility of more extensive development within the site boundary.

Conclusion

- 5.4.73 There are **two reasonable growth scenarios** for West End (over-and-above completions/commitments):
- 1) 96 homes across the four SLAA sites; and
 - 2) Scenario 1 plus one or more allocations necessitating Green Belt release (see Section 5.5).
- 5.4.74 With regards to a lower growth scenario, there is a need to carefully consider the appropriateness of supporting housing at Site 799 given its location in flood risk zone 2, also mindful that West End is set to see relatively high growth over the plan period. However, on balance there is a no reasonable need to formally explore a lower growth scenario for West End through the appraisal of Borough-wide scenarios. As per other sub-areas discussed above as being associated with one reasonable growth scenario to progress to Section 5.5., there is the potential to explore the merits of lower growth in Part 2 of this report.

Windlesham

Completions and commitments

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

SLAA sites

- 5.4.76 The SLAA identifies three sites with a total capacity of 36 homes. Taking these in turn:
- **Site 844** – The SLAA explains: *“The site is densely wooded and is wholly within a TPO. The site was previously submitted for 20 dwellings as part of the Call for Sites exercise. Due to the sites constraints it is considered that a low density development is suitable for the site [9 homes].”*
 - **Site 834** – comprises a collection of buildings associated with Broadway Green Farm, seemingly including older farm buildings and some more modern industrial units. The site is located in the Green Belt between Lightwater and Windlesham, but the SLAA explains the potential to deliver seven homes without Green Belt release. Considerations relate to accessibility (there is a footpath along the road to Lightwater, but this is narrow and near non-existent over the bridge crossing the Windle Brook); heritage (a collection of farm buildings is shown on the pre-1914 OS map); flood risk (there is the potential for built form to avoid the Windle Brook flood risk zone, but there is also a need to consider safe access/egress); and employment (potentially important rural industrial / workshop / office space).
 - **Site 1004** – the SLAA explains: *“The current planning application... is for 34 dwellings. However, given the TPO on half of the site, the site’s estimated capacity potential has been reduced to 20.”*

Discounted sites

- 5.4.77 There are a total of seven discounted sites, all of which are located in the Green Belt bar **Site 765**, which has availability concerns. Of the six Green Belt sites, one now has planning permission, namely **Site 445**, which is currently a garden centre located along the A30 to the east of the village; and another is not available, namely **Site 276**. With regards to the remaining three sites – **Sites 609, 809 and 915** - there are a range of issues and constraints, but no absolute constraints that serve to rule the site out of contention at this stage in the process.
- 5.4.78 Finally, there is a need to further consider Site 834, at which the SLAA identifies capacity for limited development without Green Belt release. The possibility of more extensive development within the site boundary could feasibly be explored, which would necessitate Green Belt release; however, on balance, this is not considered to be a reasonable option, given the issues with the site discussed above.

Conclusion

- 5.4.79 There are **two reasonable growth scenarios** for West End (over-and-above completions/commitments):
- 1) 36 homes across the four SLAA sites; and
 - 2) Scenario 1 plus one or more allocations necessitating Green Belt release (see Section 5.5).
- 5.4.80 With regards to a lower growth scenario, there is a need to carefully consider the merits of housing at Site 834 given the issues discussed. However, on balance there is a no reasonable need to formally explore a lower growth scenario for Windlesham through the appraisal of Borough-wide scenarios. The merits of lower growth can be explored in Part 2 (Section 9) of this report, namely the Draft Plan appraisal.

5.5 Reasonable growth scenarios

Introduction

- 5.5.1 Having gone through a process (see Figure 5.1) involving consideration of strategic issues/options (Section 5.2), site options (Section 5.3) and sub-area scenarios (Section 5.4), the final task is to draw together the understanding generated in order to arrive at a single set of reasonable growth scenarios.
- 5.5.2 In practice, this involves considering ways of combining the sub-area specific site scenarios introduced above. Additionally, supply from the sub-area scenarios is combined with:
- **Completions** – 728 homes have already been completed since the start of the plan period;
 - **Commitments** – 2,424 homes are anticipated at consented sites (detailed or outline);²¹
 - **Windfall allowance** – 457 homes can be anticipated to come forward, through the development management process, at sites neither with planning consent nor allocated in the plan.
- 5.5.3 Total supply from the above sources is 3,609 homes, which is a figure ~2,070 homes short of the 5,680 homes figure that is discussed in Section 5.2 as the “adjusted average housing need figure” and the **housing requirement** figure that reasonable growth scenarios should be primarily focused on.
- 5.5.4 Additionally, as discussed in Section 5.2, there is a need to ensure a **supply buffer**, i.e. a total supply in excess of the requirement. As such, there is a need to primarily focus on combinations of sub area scenarios that would deliver *in excess of* 2,070 homes.
- 5.5.5 With regards to **lower growth scenarios**, Section 5.2 explains that there is a strategic argument for exploring scenarios of this nature, given the extent of constraints that exist. However, having gone through a process of exploring site options and sub-area scenarios in Sections 5.3 and 5.4, the conclusion is that there is no reasonable need to define and appraise lower growth scenarios mindful of the potential to explore the merits of lower growth in Part 2 of this report). The minimum number of homes achieved by combining the sub-area scenarios is 2,473 homes, i.e. a figure comfortably in excess of 2,070 homes.
- 5.5.6 With regards to **higher growth scenarios**, Section 5.2 explains that there is a strategic argument for exploring scenarios of this nature, particularly given affordable housing needs. Furthermore, having gone through a process of exploring site options and sub-area scenarios in Sections 5.3 and 5.4, it is clear that reasonable higher growth scenarios do exist, i.e. *do* warrant being formally defined and appraised.

N.B. there is a question whether higher growth scenarios should be underpinned by an assumption that the housing requirement would be increased, the supply buffer increased, or both. This matter is returned to below.

Combining sub area scenarios

- 5.5.7 Reasonable scenarios for each sub-area are presented in Table 5.1, which is a summary of the sub-area specific conclusions presented in Section 5.4. There are two important points to note:
- **Smaller Green Belt release sites** – in Section 5.4 the discussions for Bagshot, Bisley, Chobham, West End and Windlesham identify a shortlist of 18 sites with a theoretical capacity in the region of 1,000 homes. However, in practice, even under a scenario whereby there is a clear strategic argument for Green Belt release, some or perhaps even all of these sites might be identified as unsuitable for allocation upon further investigation and/or the capacity at some or perhaps even all of these sites might be identified as significantly lower than the theoretical capacity. As such, within the ‘Scenario 2’ column of Table 5.2, and moving forward within this report, the assumption is that ~800 homes would come forward across some or all of the sites.
 - **Fairoaks Airport** – the figure presented in the ‘Scenario 3’ column for Chobham assumes allocation of Fairoaks Airport, which would deliver ~1,000 homes in the plan period (see further discussion below).

²¹ This figure is arrived at by totalling the capacity of committed sites (2,440) and then applying a 3% ‘lapse rate’ discount.

Table 5.1: Sub-area scenarios

Sub-area		Number of homes in the plan period [Over-and-above completions, commitments and windfall]		
		Scenario 1	Scenario 2 <i>Scenario 1 plus...</i>	Scenario 3 <i>Scenario 1 plus...</i>
West of the Borough (plus Lightwater minus Bagshot)	Camberley town centre	1,226	-	-
	Camberley wider area	265	-	-
	Deepcut	138	-	-
	Frimley	215	-	-
	Frimley Green	177	-	-
	Lightwater	17	-	-
	Mytchett	23	-	-
East of the Borough (plus Bagshot minus Lightwater)	Bagshot	134	~800 homes at some or all of the 18 Green Belt site options shortlisted in Section 5.4.	-
	Bisley	32		-
	Chobham	114		1,000
	West End	96		-
	Windlesham	36		-
Total		2,473	Scenario 1 + ~800	Scenario 1 + 1,000

- 5.5.8 The starting point is a borough-wide scenario comprising Scenario 1 for each sub-area. To recap, under this scenario the assumption is that supply – over-and above completions, commitments and windfall – would come from all of the sites identified as deliverable or developable by the SLAA. All of these sites are either located within an existing settlement boundary, within the CBGB or at a site in the Green Belt where there is the potential for development without Green Belt release. Under this scenario there would be no Green Belt release aside from inseting Chobham village (see discussion in Appendix IV).
- 5.5.9 This is borough-wide reasonable **growth scenario 1**. Under this scenario the total potential supply deliverable or developable SLAA capacity would be 2,473 homes. After adding supply from completions, commitments and windfall (3,609 homes), the total potential supply would be **6,082 homes**, which is a figure 7% above the average adjusted housing need figure.
- 5.5.10 Borough-wide reasonable **growth scenario 2** is then naturally scenario 1 plus “~800 homes at some or all of the 18 Green Belt site options shortlisted in Section 5.4.” As discussed, at this stage in the plan-making process it would not be appropriate, or reasonable, to explore higher growth scenarios defined in terms of specific smaller Green Belt sites for release. Under this scenario the total potential supply would be 6,082 + 800 homes = **6,882 homes**, which is a figure 21% above the average adjusted housing need.
- 5.5.11 Borough-wide reasonable **growth scenario 3** is then naturally scenario 1 plus additional allocation of Fair Oaks Airport (or ‘Fair Oaks’). Fair Oaks is associated with a range of issues, but does include an element of PDL, and is being promoted as a ‘Garden Village’ (GV). Total capacity of the site, on the basis of latest work completed by the site promoters, is “at least 1,500 homes”, but a safe assumption (given delivery risks and uncertainties) is that ~1,000 homes would come forward in the plan period. Therefore under this scenario the total potential supply in the plan period would be 6,082 + 1,000 homes = **7,082 homes**, which is a figure 25% above the average adjusted housing need figure.

5.5.12 The above discussion leads to three reasonable growth scenarios, which are presented in Table 5.2 and across the subsequent maps. These are considered to be the ‘reasonable’ growth scenarios, for appraisal and consultation, at the current time. This is on the basis of the process set out across this section of the report as a whole (as summarised in Figure 5.1). Final points to note are as follows:

- There is invariably a need to make simplifying assumptions in order to arrive at a manageable number of scenarios for appraisal, and in the case of Local Plan growth scenarios (defined to a level of detail in line with plan objectives) it is fair to say that there is a need for major simplifying assumptions. It should be noted that *“the phrase all reasonable alternatives does not equate to all conceivable alternatives.”*²²
- There is not considered to be a need to consider a scenario involving fewer homes than Scenario 1 at this current stage, but that is not to suggest that there are not issues/impacts associated with certain of the sites supported under this scenario. These issues/impacts are explored through the appraisal below (Sections 6 and 9) and, in light of the appraisal (and consultation responses received) the Council might reasonably consider a lower growth scenario when finalising the plan for publication (Regulation 19).
- With regards to Scenario 2, as discussed, this scenario is defined without specifying precisely which Green Belt sites would be allocated and the precise capacity of each. Uncertainty regarding site-specifics is an appraisal limitation, in that it leads to uncertainty around significant effects, but it is an unavoidable reflection of the stage of the plan making process. There will be the potential to revisit reasonable growth scenarios subsequent to the current consultation, drawing upon the latest evidence, including consultation responses received, and further technical work as necessary.
- As discussed, under Scenarios 2 and 3 there is a question-mark regarding whether the housing requirement would be set at a figure above 299 dpa / 5,680 homes, or whether the housing requirement would remain at 299 dpa (as per Scenario 1) but the supply buffer would increase. At this stage the assumption is that the housing requirement would remain at 299 dpa.

Table 5.2: The reasonable growth scenarios (with constants greyed-out)

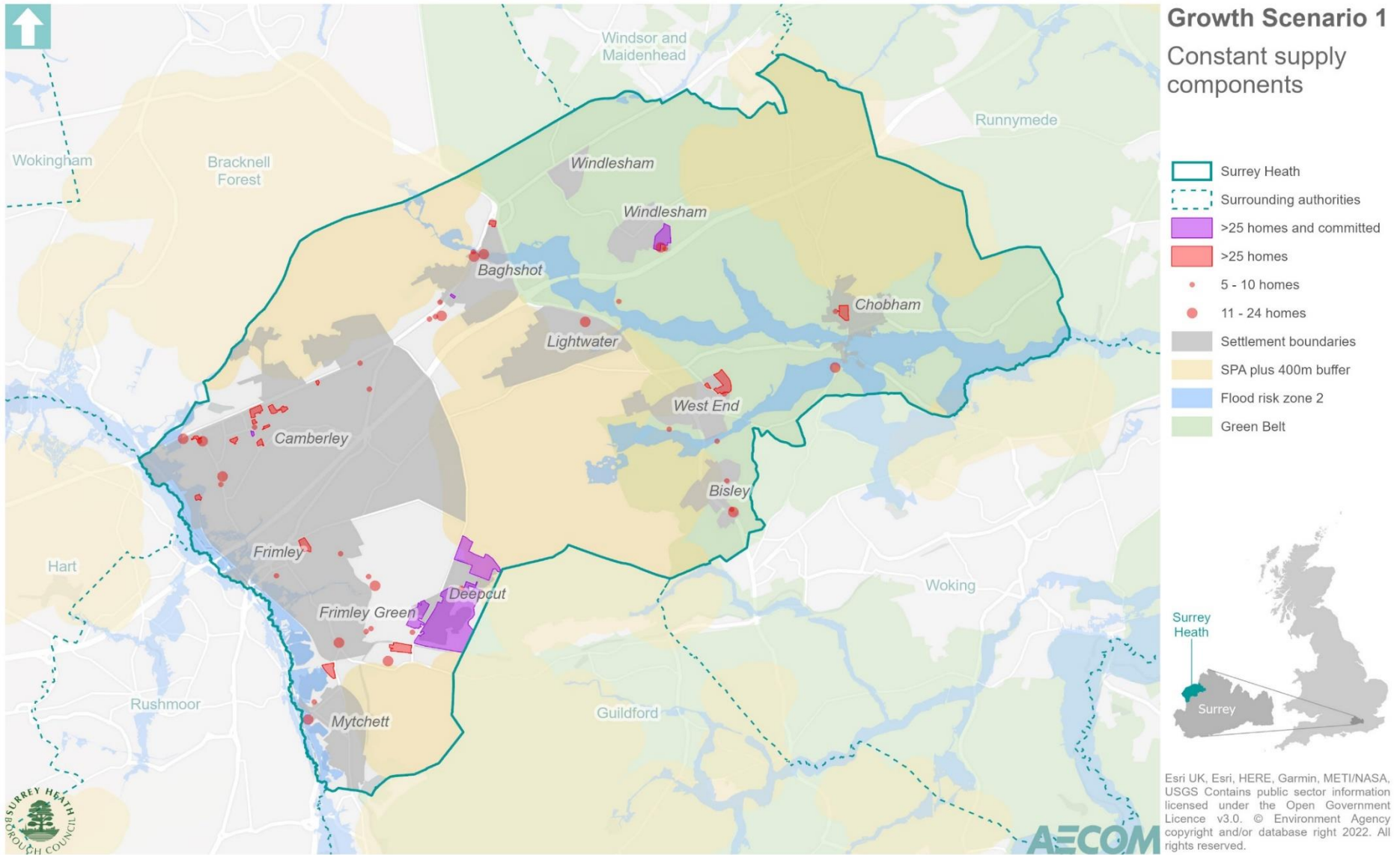
Supply component	Growth scenario 1 Constant supply components	Growth scenario 2 Constant supply components + smaller GB sites	Growth scenario 3 Constant supply components + Fairoaks GV
Completions & commitments	3,152	3,152	3,152
Windfall	457	457	457
SLAA sites	2,473	2,473	2,473
Package of smaller GB sites	-	800	-
Fairoaks Garden Village	-	-	1,000
Total supply (2019-2038)	6,082	6,880	7,082
% above 299 dpa	7%	21%	25%

5.5.13 With regards to the maps presented below, notes are as follows:

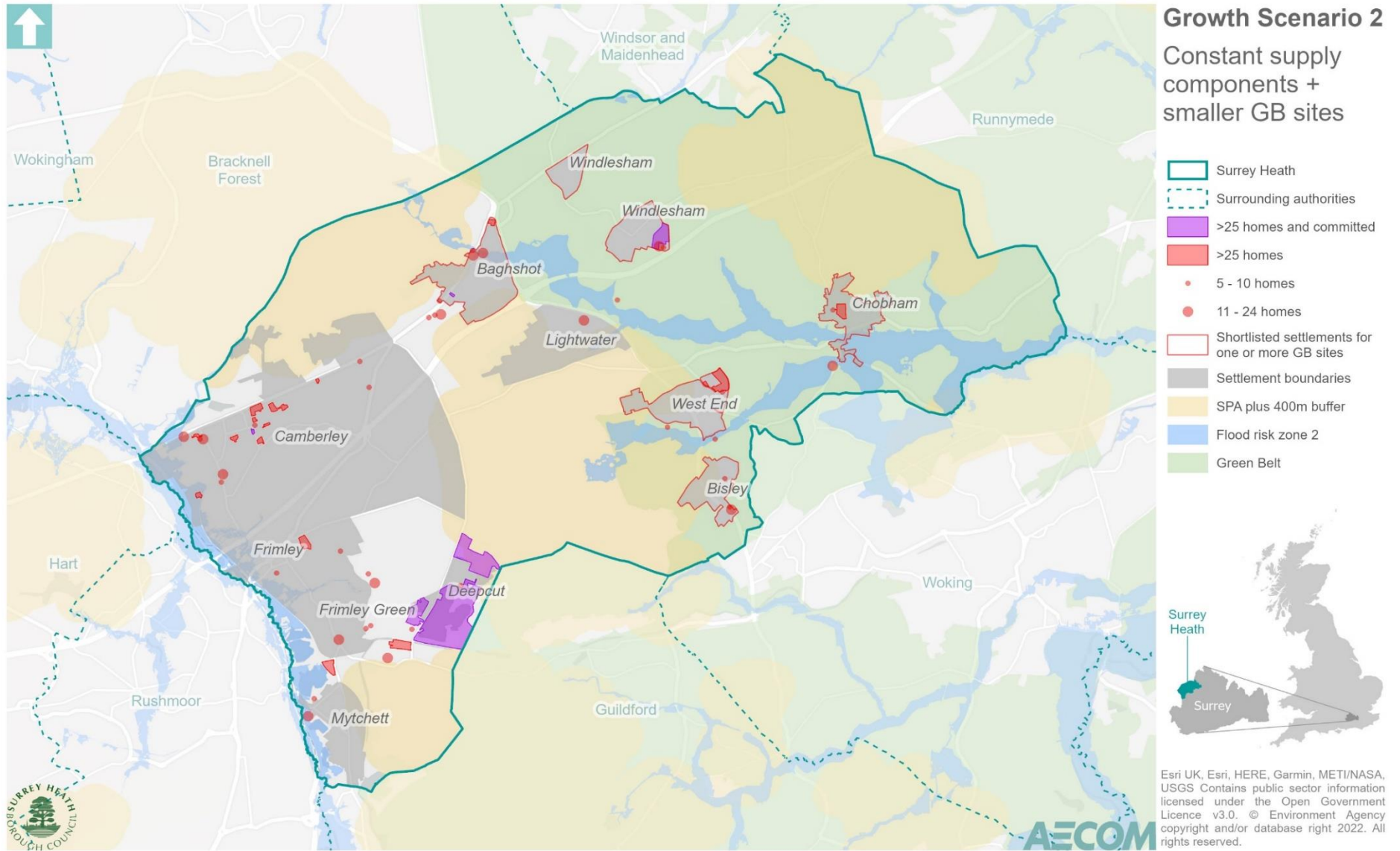
The aim is to show simplified environmental constraints, to enable proposed development sites (both allocations and other sites identified as deliverable or developable in the SLAA) to clearly stand-out. In particular, this means that the maps do not differentiate between the SPA and the SPA 400m buffer, nor do they show the other designations that overlap the SPA, namely SSSI (all the SPAs are also SSSI) and SAC (most are also SAC). Also, the maps do not show the Basingstoke Canal (the only SSSI in the Borough not designated as SPA; also a conservation area; a notable constraint to growth at Deepcut), nor do they show SNCl or heritage constraints, which together heavily constrain much of the CBGB. With regards to Green Belt, the maps do serve to show where this intersects the SPA plus 400m buffer.

²² See <https://www.aylesburyvaledc.gov.uk/sites/default/files/VALP/VALP%20Report.pdf>

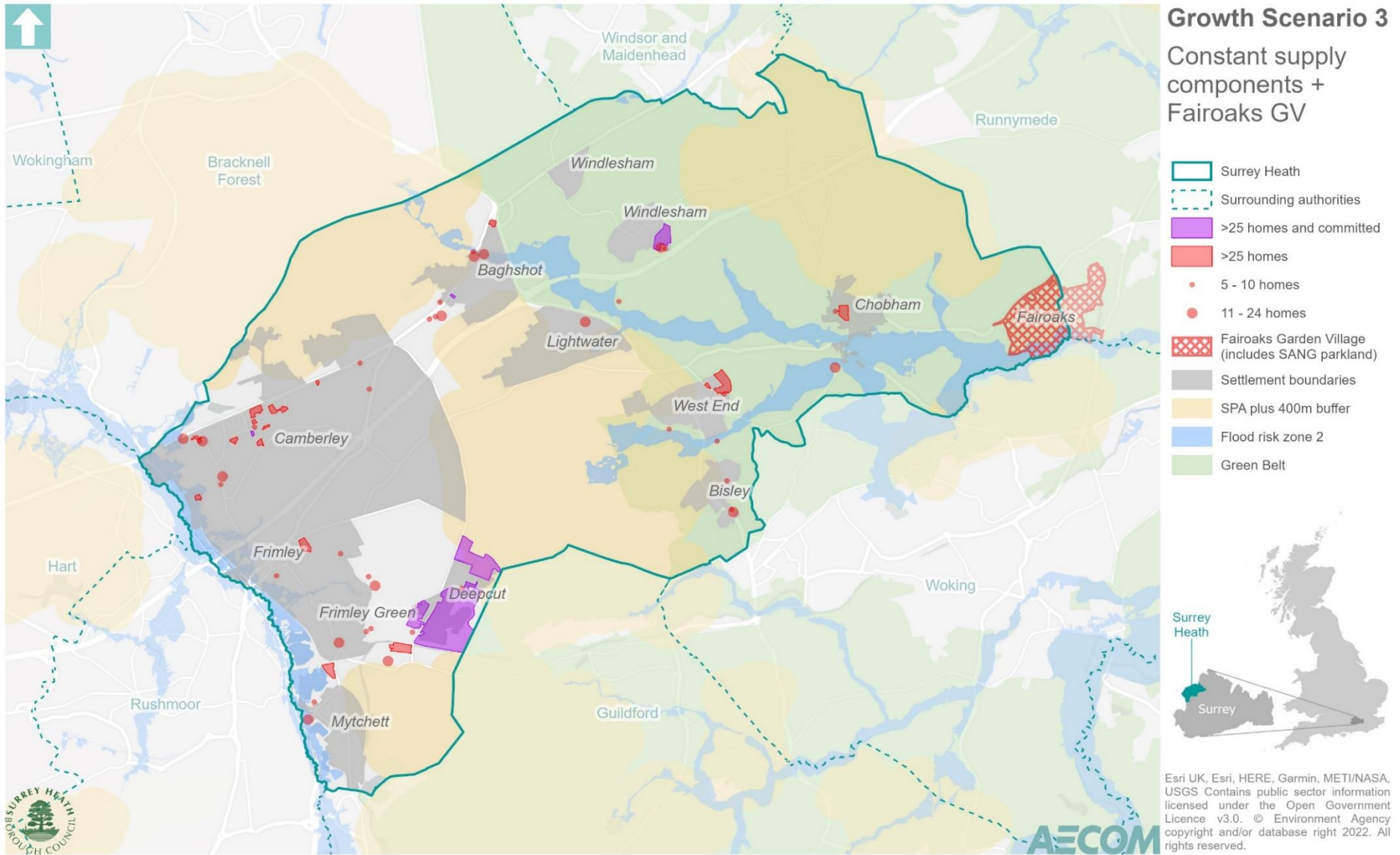
Reasonable growth scenario 1: Constant supply components (i.e. all sites identified as deliverable or developable by the SLAA)



Reasonable growth scenario 2: Scenario 1 plus ~800 homes at some or all of the 18 Green Belt site options shortlisted in Section 5.4



Reasonable growth scenario 3: Scenario 1 plus Fairoaks Garden Village (at least 1,500 homes in total, with 1,000 assumed in the plan period)



6 Growth scenarios appraisal

6.1 Introduction

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

Table 6.1: The reasonable growth scenarios – summary

Scenario	Distribution	Total potential supply
1	Constant supply components	6,082
2	Constant supply components + Package of GB sites	6,882
3	Constant supply components + Fairoaks	7,082

6.2 Appraisal methodology

- 6.2.1 Summary appraisal findings are set out in Table 6.1, which comprises: 13 rows - one for each of the topics that comprise the core of the SA framework (see Section 3); and 3 columns (one for each of the growth scenarios). For each of the sustainability topics in turn, the aim is to both categorise the performance of each of the reasonable growth scenarios in terms of significant effects (using **red** / **amber** / **light green** / **green**)²³ and rank the reasonable growth scenarios in order of preference.
- 6.2.2 In accordance with the SEA Regulations, for each scenario, the primary aim is to “identify, describe and evaluate” significant effects on the baseline in respect of each element of the established appraisal framework in turn. Equally, the aim is to differentiate effectively, regardless of significant effects. Conclusions on significant effects and relative performance are reached on the basis of available evidence and understanding of key issues and opportunities, mindful of guidance. The aim is to balance, on the one hand, the need for structured and systematic appraisal with, on the other hand, the need for conciseness and readability. As part of this, the appraisal narratives omit unnecessary discussion of ‘non-issues’, i.e. issues in terms of which it is not possible to either reach conclusions on significant effects or meaningfully differentiate between the performance of the scenarios.
- 6.2.3 Further points to note are as follows:
- Scenario 1 – the aim is to present a high level discussion, in the knowledge that all of the sites that feature within this scenario are a constant across the three scenarios (i.e. it is not possible to differentiate between the scenarios on the basis of issues/impacts associated with these sites) and are a focus of detailed appraisal in Part 2 (Section 9) of this report.
 - Scenario 2 – it is important to reiterate that this scenario is unavoidably defined in somewhat high level terms, in that the identified sites are best described as a shortlist, and there is little or no certainty regarding the approach that might be taken to development. It has not been possible to take account of materials submitted by site promoters in respect of masterplanning etc.
 - Scenario 3 – a key consideration is the extent to which it is appropriate to take account of the extensive materials submitted by the site promoter. As this is a strategic site there is certainly a need to take site specific proposals into consideration, e.g. in respect of masterplanning and the proposed approach to directing limited funds to measures aimed at mitigation and ‘planning gain’ (e.g. affordable housing). However, there is a need to apply caution, as site specific proposals are subject to change.
- A related consideration, in respect of Scenario 3, is the extent to which it is appropriate to take account of materials submitted as part of the planning application process for a 1,000 home scheme at Fairoaks (ref. [18/0642](#)), which was submitted in 2018 before being withdrawn in February 2020. It is appropriate to be mindful of issues and opportunities discussed as part of the planning application process, however there is a need to apply caution given the specific nature of the scheme under consideration.

²³ **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. No colour indicates a neutral effect.

6.3 Appraisal findings

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

Under each of the topic headings the aim is to both categorise the performance of each of the reasonable growth scenarios in terms of significant effects (using **red** / **amber** / **light green** / **green**) and rank the reasonable growth scenarios in order of preference (where 1 is best performing; highlighted with a star).

Accessibility (to community infrastructure)

Growth scenario 1 Constant supply components	Growth scenario 2 Constant supply components + smaller GB sites	Growth scenario 3 Constant supply components + Fairoaks GV
★ 1	3	2

6.3.2 Beginning with **Scenario 1**, the fact that the great majority of supply is from sites located within existing settlement boundaries serves to indicate a tendency toward relatively accessible locations; and there is a clear focus of growth at Camberley, Frimley and Frimley Green, which are the parts of the Borough that benefit from highest levels of accessibility. Also, across the villages the primary focus of growth (both ‘new’ sites and in total) is at Bagshot (which benefits from a district centre and public transport connectivity) and at Deepcut (where new community infrastructure is coming forward as part of the Princess Royal Barracks strategic scheme). However, there are several small sites within the CBGB and the Green Belt that are not adjacent to a settlement boundary, most notably sites at Deepcut, south of Bagshot and Site 834 between Lightwater and Windlesham, albeit the identified capacity at these sites is mostly very low. Matters are explored further in Section 9.

6.3.3 With regards to **Scenario 2**, there is a degree of concern, because: A) none of the sites in question are thought likely to deliver new strategic community infrastructure (i.e. infrastructure that serves to address an existing need / significantly benefit the existing community); and B) the effect would be that a significantly higher proportion of the overall Local Plan growth strategy would be directed towards villages without a district centre or a rail station, namely Bisley, Chobham, West End and Windlesham. Directing growth to villages can be beneficial where there is a need to support the viability of existing centres and community services/facilities, but no such opportunities have been highlighted in this instance (to date).

6.3.4 A particular concern could potentially relate to a higher growth strategy at Windlesham, given the lack of a primary school (there is an infant school for children aged 4 – 7 at Snows Ride) and poor links between Snows Ride (which could potentially see a significant proportion of growth) and the main village core, where local centre is located. Certain other sites are also somewhat peripheral, including sites to the east of Chobham, and the identified site at Bagshot (Site 736) is separated from the village by the A322.

6.3.5 Finally, with regards to **Scenario 3**, a primary consideration is that there would be the opportunity to deliver new community infrastructure alongside new housing, which is an opportunity to be realised as far as possible. This is one of the key reasons why there is support nationally for growth at scale, including garden villages. For example, paragraph 72(b) of the NPPF (2019) supports “larger scale development” provided: “... size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access”. There is a range of community infrastructure that can potentially be delivered alongside housing, ranging from lower order (e.g. a primary school) to higher order (e.g. a secondary school). New strategic community infrastructure can sometimes be delivered that also contributes to meeting the needs of existing community.

6.3.6 In the case of Fairoaks GV, the proposal is for a relatively small scheme, in comparison to other garden villages nationally, and this reflects strongly on the potential community infrastructure ‘offer’. The current Vision Document states: “The scheme will be designed to enable a whole new way of life, one that’s sustainable, healthy, convenient and community focused. Fairoaks will be an exemplar development of the highest standards – a place where people genuinely want to live, work and play.” It also proposes a “self-sufficient place where needs for work, leisure, living and social interaction are largely met on site.”

6.3.7 Specific proposals include:


- a 2 form entry primary school, with space to expand to 3 forms of entry in the future if required;
- a local centre (co-located alongside the primary school) to include a community centre, community café, pub, flexible co-working space with hot desking provision and pick-up / drop off for online deliveries; and
- a sports hub with multi-use playing pitches and a pavilion building.

6.3.8 However, it is important to question the extent to which ‘self-sufficiency’ (mentioned five times in the Vision Document) would be achieved. Whilst the nearest comparable scheme – Longcross GV – is of a very similar scale, it benefits from a rail station, which serves to reduce concerns regarding offsite trips (although concerns remain, as discussed further below). Other schemes tend to be larger, with a critical mass achieved that enables delivery of community infrastructure over-and-above that proposed for Fairoaks GV. For example, the committed Wisley Airfield scheme (c.2,000 homes), in Guildford Borough, is set to deliver a secondary school, whilst all three of the case-studies presented within the Fairoaks Vision Document involve significantly larger schemes, ranging from 2,500 homes to 3,600 homes.

6.3.9 Given that the scale of the scheme will undoubtedly limit self-sufficiency and trip internalisation, the next point to consider is links to offsite higher order community infrastructure, for example secondary schools. In broad terms, it is fair to highlight that the site benefits from close proximity to Woking town centre; however, there are a range of detailed matters that will require further investigation, most notably in respect of transport links (a focus of discussion below), but also in respect of existing community infrastructure capacity. There would be a need to work closely with Surrey County Council and other partner organisations to carefully consider matters relating to access to community infrastructure.

6.3.10 In **conclusion**, there is a clear concern regarding Scenario 2 (package of smaller GB sites), and it is appropriate to flag ‘a negative effect of limited or uncertain significance’. It is difficult to differentiate the other two scenarios, as whilst Fairoaks would involve delivering new community infrastructure alongside housing, the proposed scheme is small for a Garden Village, which limits the potential to achieve self-sufficiency, and there are issues with links to Woking. On balance it is judged appropriate to highlight Scenario 1 as preferable, although there is some uncertainty. Neutral effects are predicted for these two scenarios (N.B. see further discussion of Scenario 1 in Section 9, where close consideration is given to proposed development management policy).

Air quality

Growth scenario 1 Constant supply components	Growth scenario 2 Constant supply components + smaller GB sites	Growth scenario 3 Constant supply components + Fairoaks GV
	2	2

6.3.11 This is an important consideration locally, given a number of designated Air Quality Management Areas (AQMAs), notably affecting the centres (all outside of Surrey Heath Borough) of Knaphill, Woking and Addlestone (plus the M3 corridor through Camberley), albeit air quality is set to improve over coming years as the number of petrol and diesel vehicles on the road decreases. Moreover, there are potential impacts on the TBHSPA as a result of any additional vehicle movements in proximity to sensitive habitat (associated with nitrogen and ammonia deposition from vehicles), however this is covered under the biodiversity section.

6.3.12 Beginning with **Scenario 1**, the first point to note is that none of the proposed sites intersect an AQMA; however, several are in proximity to either the M3 or the A322 dual carriageway, which could suggest a risk of problematic air and/or noise pollution, plus there is a need to consider other potential pollution sources, including railway lines and employment uses. With regards to the risk of growth leading to traffic through an AQMA, or otherwise exacerbating or creating problematic air and/or noise pollution, it is difficult to draw strong conclusions ahead of detailed traffic modelling. However, there will clearly be a need to ensure that a relatively high growth strategy for the western urban area does not lead to issues. Matters are explored further in Section 9.

- 6.3.13 With regards to **Scenario 2**, it is difficult to suggest that there would be significant additional traffic through an AQMA. However, there could be pressure to allocate one or more sites adjacent to the M3 and/or the A30, such that new homes could experience a degree of air and/or noise pollution. Furthermore, higher growth at any of the Green Belt settlements in the east of the Borough would likely generate traffic along one of the a-roads that pass through the centre of village centres / residential areas, and also potentially Camberley bound traffic along more minor roads (matters relating to traffic are considered further below).
- 6.3.14 Finally, with regards to **Scenario 3**, the Fairoaks Vision Document includes a section on air quality, but does not discuss nearby AQMAs, nor any other location specific issues or opportunities. The A319 is not constrained by any AQMA (although the road does pass through the centre of Chobham), nor is the A320 between Woking and the M25; however, a concern could potentially relate to journeys along the A320 that pass through the AQMA south of Woking. Looking beyond the designated AQMA, the effect of Runnymede Local Plan allocations in combination on air quality along the A320 corridor was a focus of the Local Plan Examination, with paragraph 278 of the Inspector’s Report concluding that mitigation measures will lead to an overall “neutral” impact; however, there is a need to consider the risk of additional growth through the Surrey Heath Local Plan leading to problematic air quality along the A320, e.g. affecting Ottershaw. It is noted that no air quality concerns were raised as part of the planning application process for a smaller (1,000 home) scheme at Fairoaks in 2019.
- 6.3.15 In **conclusion**, it is fair to highlight a risk of impacts under Scenarios 2 and 3 over-and-above Scenario 1, although concerns are of limited significance. Neutral effects are predicted for all three scenarios.

Biodiversity

Growth scenario 1 Constant supply components	Growth scenario 2 Constant supply components + smaller GB sites	Growth scenario 3 Constant supply components + Fairoaks GV
★ 1	2	2

- 6.3.16 Biodiversity is a centrally important constraint to growth in Surrey Heath, given the Borough’s close association with the internationally important Thames Basin Heaths Special Protection Area (TBHSPA).
- 6.3.17 Beginning with **Scenario 1**, the first point to note is that whilst all proposed sites are beyond the 400m TBHSPA buffer zone, several are located not far beyond this zone. There is confidence in the strategy for avoiding and mitigating effects, and this matter is a focus of detailed consideration through a stand-alone Habitats Regulations Assessment (HRA); however, there will be a need for further detailed consideration following consultation with Natural England and other organisations with an interest in the SPA and wider matters relating to biodiversity, nature recovery etc.
- 6.3.18 The next matter for consideration is then the risk of impacts to the nationally designated Basingstoke Canal SSSI, with two sites wholly or partly adjacent. However, these schemes are modest in scale, and low proposed densities serves to indicate good potential to maintain the mature trees onsite, particularly those adjacent to the canal. A design cue might be taken from the nearby committed Princess Royal Barracks strategic site, which is delivering a woodland buffer between new homes and the canal.
- 6.3.19 The next matter for consideration is growth in proximity to locally designated Sites of Nature Conservation Importance (SNCIs), including one site at Deepcut that is adjacent to the extensive woodland SNCI between Deepcut and Frimley (mostly MOD land), and it is noted that this site includes extensive tree cover. However, this is a small site for just 17 homes. There is also a sensitivity along the Blackwater Valley at Mytchett.
- 6.3.20 Finally, there is a need to consider sites intersecting woodland priority habitat or tree preservation orders (TPOs) or otherwise with extensive tree cover. There are several such sites, most notably at Deepcut.



- 6.3.21 With regards to **Scenario 2**, a primary point to note is that identified sites to the south of West End / north of Bisley (Site 153 and 902) intersect the TBHSPA 400m buffer, and one of the sites currently comprises open space. However, new homes would be outside the buffer and SANG capacity can be assumed,²⁴ plus there is a good network of Local Nature Reserve (LNR) in this area, which potentially serves to reduce concerns around recreational pressure. Furthermore, with regards to SPA proximity: two shortlisted sites at Chobham (Sites 916 and 918) are adjacent to the 400m zone, and this an accessible part of the SPA (Chobham Common), albeit managed as a National Nature Reserve (NNR); and a site south of Bisley (Site 800) is in proximity to the 400m buffer, although it seems that the SPA here has limited accessibility, and Bisley Common is nearby which, is open access land (also an SNCI).
- 6.3.22 There are a range of other concerns associated with the identified sites given onsite mature woodland/ forestry/ trees or hedgerows that potentially contributes to landscape-scale ecological functioning, including sites at West End and Chobham, where the woodland is shown as priority habitat by the nationally available dataset, although not ancient woodland or locally designated. A final consideration is the risk of sites at West End / Bisley and Chobham impacting in-combination on the River Bourne corridor; however, equally, there could be the potential for development to support some targeted (albeit limited) habitat enhancement or creation.
- 6.3.23 Finally, with regards to **Scenario 3**, the Vision Document includes a range of detailed proposals to avoid and mitigate the risk of impacts to nearby Horsell Common, which forms part of the TBHSPA, including a proposal to deliver a large SANG that will likely also be of a high quality (being associated with a river valley and a former parkland). On this basis, it should be possible to sufficiently mitigate recreational impacts on the TBHSPA, despite the close proximity (the site is just beyond the established 400m buffer).
- 6.3.24 There does also appear to be a good opportunity to deliver well-targeted new habitat creation onsite, including new wetland habitats within the river corridor and new heathland elsewhere, although habitat creation proposals warrant further detailed scrutiny, e.g. it seems potentially ambitious to suggest that new heathland will be created that is capable of supporting SPA qualifying bird populations.
- 6.3.25 However, concerns do remain regarding impacts to Horsell Common, given that pedestrians, cyclists and motorists moving between the site and Woking will need to pass through or adjacent to it, and noting that the part of Horsell Common SSSI closest to Fairoaks is in 'unfavourable recovering' condition (albeit there is only one better condition status, namely 'favourable'). For example secondary school and sixth form / college students might drive, cycle or walk between the site and Woking on a daily basis. In turn, there could be a risk of impacts such as air pollution, disturbance, littering and wild fires. There could also be a risk of more direct impacts, given the possibility of "pedestrian/cycle works" within the SPA, to link the site to Woking. This would be a matter to explore through HRA ahead of any allocation.
- 6.3.26 Also, a secondary concern is in respect of the north-eastern part of the proposed settlement area, which will impact on a significant area of land with a clear former parkland character, with mature tree belts / inter-linked copses and many individual mature trees. None of this woodland is locally designated (either by Surrey Heath or Runnymede), but much of it comprises priority habitat, one very small patch comprises ancient woodland, and there is a need to consider functional links with the extensive areas of woodland and parkland to the north of the A319, much of which is locally designated. It is clear that the proposed masterplan aims to avoid areas of greatest sensitivity, and the Vision Document proposes "*reinforcing existing natural features such as trees and hedgerows*", however, a degree of concern does remain, and it is noted that the Woodland Trust raised detailed concerns as part of the planning application process for a proposed smaller scheme in 2019 (ref. [18/0642](#)). Given these concerns, there is a need to scrutinise the suggestion made within the Vision Document that habitat creation onsite will serve to enhance the function of the site as a 'stepping stone' within the wider landscape, e.g. helping to ensure ecologically connectivity between Chobham Common and Horsell Common.
- 6.3.27 Overall, the suggestion that the scheme would result in an "a major positive effect" on the SPA must be challenged. It is recognised that the new strategic SANG will not only draw new residents away from the SPA, but also existing residents of nearby communities, *possibly* leading to a net benefit in terms of recreational pressure; however, there are a range of other important considerations that must feed into an overall conclusion regarding net biodiversity impacts / extent of biodiversity net gain.

²⁴ It is unlikely, or at least unclear, that any of the sites could deliver onsite SANG, hence there would be a need to draw down capacity from offsite strategic SANG; however, there is relatively healthy strategic SANG capacity in the east of the Borough. Current capacity could not fully meet the need of 800 homes, but there are opportunities for SANG in this area.

6.3.28 In **conclusion**, there is an inherent concern with higher growth scenarios given the sensitive nature of the Borough as a whole, and concerns crystallise once consideration is given to the specific sites that might be supported under higher growth scenarios. Taking the scenarios in turn:

- Scenario 1 – there are concerns with a number of sites, including sites in proximity to the TBHSPA (albeit beyond 400m), Basingstoke Canal SSSI and SNCIs, and a number of sites intersect woodland or significant onsite trees. It is recognised that there also a number of site specific opportunities, as discussed further in Section 9, but at this stage it is appropriate to flag ‘a negative effect with limited or uncertain significance’.
- Scenario 2 - it does seem likely that under a scenario whereby there is a need to allocate land for around 800 homes in the Green Belt there would be pressure to deliver new homes in very close proximity or even adjacent to the TBHSPA 400m buffer, plus pressure to allocate sites associated with wider constraint. On this basis, it is appropriate to predict the likelihood of significant negative effects.
- Scenario 3 - there is a great deal of uncertainty, and the potential (both inherent to all strategic sites and specific to Fair Oaks) to deliver strategic targeted enhancements is recognised, but on balance it is judged appropriate to flag the likelihood of a significant negative effect as per Scenario 2.

Climate change adaptation

Growth scenario 1 Constant supply components	Growth scenario 2 Constant supply components + smaller GB sites	Growth scenario 3 Constant supply components + Fair Oaks GV
	2	

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

6.3.30 With regards to **Scenario 1**, the primary point to note is that one site significantly intersects flood risk zone 3, namely Site 912 at Mytchett; however, the proposed capacity (16 homes) amounts to a low density (10.7 dph), hence it may be possible to avoid development in the most problematic parts of the site. The second point to note is that several sites modestly intersect flood risk zone 3, such that there is confidence in the ability to avoid built development in this zone.

6.3.31 There is also a need to consider flood risk zone 2, which should be avoided if possible, mindful of the risk of increased flood risk under climate change scenarios (see [Section 9](#) of the Climate Change Study, 2020). Several sites do significantly or entirely intersect this flood risk zone, hence there is a degree of concern, but it will be for the Environment Agency to comment in detail through the consultation.

6.3.32 A further consideration is surface water flood risk, with the primary consideration potentially surface water flood risk affecting Camberley town centre and land adjacent to the railway line that passes through the wider urban area. Another flood risk consideration can be the risk of development leading to increased surface water run-off and, in turn, increased downstream flood risk, but it is difficult to reach strong conclusions given potential to deliver sustainable drainage systems (SuDS). Matters are explored further in Section 9.


6.3.33 With regards to **Scenario 2**, an immediate concern is the concentration of shortlisted sites associated with the Bourne corridor south of West End / north of Bisley and sites to the southwest of Chobham, where the landscape is associated with the confluence of the Bourne and Windle Brook. It seems likely that, under this scenario, there would be significant pressure for additional housing within flood risk zone 2. With regards to surface water flood risk there are limited concerns, although there is a notable surface water flood risk channel that runs along the eastern edge of West End (Site 813). Also, the shortlisted site north of Bagshot (Site 247) intersects a surface water flood channel, and it is important to note that downstream is a residential area significantly affected by fluvial flood risk.

6.3.34 Finally, with regards to **Scenario 3**, the site is associated with the valley of the River Bourne and, correspondingly, there are several significant corridors of flood risk, where residential uses should be avoided, also mindful of the potential for flood risk zones to expand due to climate change. It could prove that there is good potential to avoid (and buffer) flood risk zones; however, the current masterplan shows

housing in very close proximity to current flood risk zone 2, which could warrant further attention (it is noted that “a detailed flood risk model was agreed with the Environment Agency as part of the previous planning application”). The current masterplan also shows a series of small water attenuation areas between the southern boundary of the proposed settlement and the River Bourne, and states that there will be the potential for “flood risk and river quality improvements”. Furthermore, through correspondence with the site promoters, it was confirmed that work completed in 2019 (as part of a planning application for a 1,000 home scheme) demonstrated “a substantial betterment beyond the required greenfield runoff rate and volume performance of the site”. However, there will be a need to scrutinise the level of ambition, ensuring that opportunities are taken to minimise and potentially reduce existing down-stream flood risk, noting areas within Addlestone that are affected by flood risk, and noting that draft revisions to the NPPF (2021) reflect an increased focus on “natural flood management techniques”.

6.3.35 In **conclusion**, at this stage, it is appropriate to flag a degree of concern with all scenarios, ahead of receiving detailed comments from the Environment Agency through the current consultation. With regards to Scenario 2, it does seem likely that, under any scenario whereby there is a need to allocate land for around 800 homes in the Green Belt there would be pressure to deliver new homes in flood risk zone 2. However, it is recognised that further detailed site selection and masterplanning could and would be completed to reduce concerns. With regards to Scenario 3, the site is strongly associated with a river corridor, but there would appear to be good potential to avoid development in the flood risk zone, and the potential for strategic flood water attenuation measures, to the benefit of locations downstream that experience flood risk, can be envisaged.

Climate change mitigation

Growth scenario 1 Constant supply components	Growth scenario 2 Constant supply components + smaller GB sites	Growth scenario 3 Constant supply components + Fairoaks GV
	3	2

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

6.3.37 As discussed in Section 5.3, strategic growth locations can give rise to an opportunity to minimise built environment emissions, in particular by supporting heat networks and other measures to minimise regulated operational emissions (e.g. high fabric/efficiency standards, rooftop solar PV), but also potentially non-operational emissions (e.g. by supporting modern methods of construction, e.g. modular buildings) and possibly even unregulated operational emissions (i.e. emissions not covered by the building regulations, for example plug in electrical appliances). Strategic growth locations can also give rise to an opportunity to deliver high quality electric vehicle charging (see discussion in [Section 5](#) of the Climate Change Study), and potentially ‘smart energy systems’ that link heat networks / heat pumps, solar PV, power consumers and battery storage. Strategic growth locations can also potentially give rise to an opportunity to explore use of hydrogen for heating, and can potentially also support largescale renewable power generation, e.g. hydropower.

6.3.38 In light of these points, there is certainly a significant opportunity associated with the high growth strategy for Camberley town centre (**Scenario 1**), which the Climate Change Study suggests is potentially a “once in a century opportunity”. The second consideration is then the degree to which a new garden village at Fairoaks (**Scenario 3**) represents an opportunity. In short, at the current time it is not clear that there are any particular locational opportunities, nor is it clear that minimising built environment emissions is set to be a major focus as part of masterplanning or when making decisions in respect of funding priorities. There is a high-level commitment to “use of sustainable construction materials”, but little beyond this, with other statements non-committal; for example a submitted Climate Change note says nothing about regulated operational emissions other than: “Fairoaks will explore where it is viable to go beyond building regulations”. Also, the following statement regarding heat networks does not inspire confidence: “Fairoaks will review the feasibility to connect to existing or develop new heat network, including the opportunity for fifth generation heat networks.” There is a need to understand more about if and how the site promoter’s vision for a garden community at this particular location represents an opportunity to minimise per capita built environment emissions in Surrey Heath.

- 6.3.39 With regards to the wider package of identified sites that are a constant across the growth scenarios, and the shortlisted Green Belt sites that come into contention under **Scenario 2**, all are modest in scale such that there is little reason to suggest any particular opportunity. An important consideration locally is understood to be the extent to which grid constraints limit the potential to deliver high quality EV charging infrastructure; however, there is insufficient evidence to enable differentiation between sites in this respect. Another consideration is support for reuse of existing buildings, as opposed to demolition and rebuild.
- 6.3.40 In **conclusion**, there is a clear concern with Scenario 2 over-and-above Scenario 1, as none of the additional sites supported would likely give rise to any particular opportunity to minimise built environment emissions, and also noting that a dispersal strategy to village edge locations gives rise to issues in respect of car dependency and therefore transport-related greenhouse gas emissions. With regards to Scenario 3, there is much uncertainty at the current time; however, on balance, it is appropriate to conclude poor performance relative to Scenario 1, primarily on account of limited evident opportunity around built environment emissions, but also noting a concern around transport emissions.
- 6.3.41 With regards to significant effects, on one hand decarbonisation is a national and local priority; however, on the other hand, it is a global issue such that local actions can only have limited impact. On balance, it is appropriate to flag “a negative effect of limited or uncertain significance” under all scenarios, given the stretching nature of the Borough’s required decarbonisation trajectory. There is a need to ensure that every effort is made through spatial strategy and site selection.

Communities

Growth scenario 1 Constant supply components	Growth scenario 2 Constant supply components + smaller GB sites	Growth scenario 3 Constant supply components + Fairoaks GV
2	3	1

- 6.3.42 Aside from matters relating to access to community infrastructure and environmental quality/health, which have been discussed above, there are wide ranging other ‘communities’ related considerations that must feed into decisions around spatial strategy and site selection, including around ensuring good health, which is a national priority at the current time. With regards to the package of sites that are a ‘constant’ across the growth scenarios (**Scenario 1**), matters are considered in detail in Section 9, but headline considerations include:
 - Camberley town centre – in comparison to the proposal in 2018, the proposal is now to follow an ambitious approach to redevelopment at the two largest town centre allocations, namely London Road Regeneration Block (proposed for 336 homes in 2018, now proposed for 550 homes) and Land East of Knoll Road (100 homes in 2018, now 475 homes in the plan period), plus Camberley Station is proposed for additional homes (60 homes in 2018, now proposed for 75) and there is one new proposed allocation, namely Land east of Park Street (120 homes). As discussed in Sections 5.3 and 5.4, there is a major opportunity to regenerate and reimagine the town centre as a location to ‘live work and play’ as well as a hub for retail and services/facilities; however, there is a need to strike a balance, ensuring that the retail and community hub function is not lost or unduly eroded. There is also a need to consider density (including massing and building heights) from a design, place-making and health / wellbeing perspective, including in respect of enabling good light and access to greenspace. There is limited greenspace in the primary shopping area, but land east of Knoll Road does include greenspace (set to be protected).
 - Existing uses – the primary consideration is land east of Knoll road, which includes the Council offices, Camberley Library, the former Portesbery School and Hillside Resource Centre, Camberley Theatre, the Ian Goodchild Centre Camberley Care Trust, the Disability Initiative and Knoll Road Car Park. The proposal is to deliver a new “residential quarter to Camberley Town Centre”, hence there will need to be careful consideration given to relocating existing facilities. Also, the Camberley Centre is a new proposed allocation for 35 homes close to the town centre, and another site of note is Chobham Rugby Club. In all instances the proposal is to reprovide existing facilities off-site, but still within the Borough. There is a need for caution at this stage, with matters discussed in greater detail in Section 9.

- Access to greenspace – a high growth strategy for Camberley town centre and the wider urban area must deliver sufficient accessible greenspace to support the increased population. Elsewhere, there is a need to consider whether growth could support enhanced access to the countryside and areas of currently inaccessible woodland. For example, there is a focus of growth adjacent to a stretch of the Basingstoke canal where there is currently no public right of way, and there might be a focus on increasing accessibility to the countryside to the east of West End and/or Windlesham, where there is currently a low density of public rights of way and a lack of open access land.
- Sites outside of settlement boundaries – several small sites are identified as deliverable or developable by the SLAA that would be located outside of a defined settlement boundary, including to the south of Bagshot, north of Lightwater, south of Chobham and to the south of the Basingstoke Canal at Deepcut.
- Play facilities – there is a need to consider whether proposed sites are of a scale whereby there is the ability to deliver new play facilities onsite, as part of a framework of green and open space.

- 6.3.43 With regards to **Scenario 2**, a primary consideration is potentially the total growth quanta at West End, potentially to include expansion to the east beyond the extent of the reserve site in the Local Plan (saved policy H8), part of which has come forward over recent years, and the final part of which is proposed for (re)allocation under all scenarios. This eastern part of West End benefits from a primary school, but is some way distant from the local centre, hence there is an argument for limiting growth to allow time for recent/proposed new communities to integrate. Elsewhere at West End, under this scenario, there could also be several smaller allocations. As such, there is a concern around piecemeal expansion. Should there be a need for expansion of West End into the Green Belt there would be a clear argument for a strategic approach to growth that delivers new infrastructure to the benefit of the village, e.g. improved access to the countryside (e.g. to the east, or along the Bourn Brook) and/or a new local centre.
- 6.3.44 Conversely, the Snows Ride area of Windlesham potentially stands out as a location where there is a growth related opportunity, given the lack of a local centre, and given that this is the location of the largest of the shortlisted sites. It is not anticipated that growth could deliver a primary school, but it is possible to envisage new community infrastructure (e.g. a new play facility, or perhaps even a small local centre with a village hall) and/or new strategic greenspace to the benefit of the existing community.
- 6.3.45 A further consideration is that one of the shortlisted Green Belt sites under Scenario 2 comprises an existing area of green space, specifically Former Bisley FC (Lion Works Sports Ground). However, the part of the site located closest to the village core falls within the TBHSPA 400m buffer, and so would need to be retained as green space, hence there could feasibly be the potential to secure enhanced green space to the benefit of the village, noting proximity to the village hall and local centre.
- 6.3.46 A final consideration, in respect of Scenario 2, is that there would be the potential to deliver new family homes with access to private gardens, which is an important consideration from a communities and health perspective, albeit also a matter that is potentially better suited to discussion under the Housing heading.
- 6.3.47 Finally, with regards to **Scenario 3**, Fair Oaks performs well, for three headline reasons. Firstly, the site is remote from existing settlements, hence there are limited concern around impacts to existing communities, e.g. from construction or due to pressure on community infrastructure (in contrast to Scenario 2, which could see relatively piecemeal expansion of villages), albeit there would still be concerns regarding traffic impacts on existing communities. Secondly, as a strategic scale scheme there is an opportunity to deliver new community infrastructure alongside housing (as discussed) and the characteristics of the site may suggest a particular place-making opportunity, noting the river valley location and the potential to integrate with a parkland. Thirdly, the proposed approach of Countryside acting as Master Developer is of note.²⁵
- 6.3.48 The current proposal is for 35 dph within the built part of the site, which is quite high in the Surrey Heath context, but serves to highlight what can be achieved at strategic-scale schemes. The site promoters highlight that there is national support for garden villages as small as 1,500 homes, and propose a new community *“small enough for any place within it to be in easy walking distance of any other, but large enough to support a wide range of activities and facilities [to] give it life and prosperity.”*

²⁵ A Master Developer takes responsibility for obtaining planning and delivering infrastructure before marketing fully serviced land parcels to housebuilders. The Fair Oaks site promoters explain: *“Successful Master Developers adhere to a vision and set of design principles for the duration of a project. Whilst these evolve over time, it is this long-term commitment and visibility that sets Master Developers apart... As Master Developer, Countryside is responsible for securing planning consent and deliver strategic infrastructure, landscaping, new homes, and community and mixed-use facilities in a coherent manner. At Fair Oaks Garden Village this will be key to achieving desirable delivery rates, placemaking quality and legacy.”*

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

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

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

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

6.3.51 In **conclusion**, there is potentially a significant place-making opportunity associated with supporting a new garden village at Fair Oaks (Scenario 3), although there are a range of uncertainties ahead of detailed work on masterplanning, viability etc. Conversely, the majority of the shortlisted Green Belt sites under Scenario 2 are small sites that would deliver little benefit to the existing community, and potentially lead to notable negative impacts, e.g. pressure on existing community infrastructure, traffic through residential areas. Under Scenario 1 there are a range of detailed considerations, but an overriding consideration is that the regeneration of Camberley town centre represents a significant place-making opportunity, including the creation of two new residential ‘quarters’ with the re-provision of new, upgraded and more accessible community facilities.

Economy and employment

Growth scenario 1 Constant supply components	Growth scenario 2 Constant supply components + smaller GB sites	Growth scenario 3 Constant supply components + Fair Oaks GV
★ 1	2	★ 1

6.3.52 Under **Scenario 1** there is limited focus on delivering new employment land, which is appropriate given the discussion of objectively assessed needs set out in Section 5.3, but there is a carefully considered strategy for Camberley town centre, which should be supportive of its role as sub-regionally important hub of economic activity. There is also a need to consider sites identified as deliverable/developable for residential use within the SLAA that are currently in use for employment, albeit there is a need to be mindful of permitted development rights that can allow for a change of use from employment to residential via the prior approval process, i.e. without going through the planning application process.

- 6.3.53 A key site for consideration is Sir William Siemens Square Site, Chobham Road, Frimley (Site 907), noting that whilst the site is currently unallocated in the adopted Core Strategy, the Issues and Options consultation document (2018) proposed allocation of a Strategic Employment Site. The Employment Land Technical Paper (2019) strongly supported continued use for employment, describing it as a “*high quality, high profile site.*” However, the latest situation is that the site is currently vacant.
- 6.3.54 With regards to **Scenario 2**, it is thought unlikely that any of the sites in question would deliver new employment land, and a further consideration is the risk of problematic traffic congestion impacting on businesses, although there is no reason to suggest any significant concern in this respect. One possible benefit is increased larger / family housing with space standards suited to supporting homeworking.
- 6.3.55 Finally, with regards to **Scenario 3**, the scheme would deliver new employment land to expand an existing employment location. However, the strategic importance of employment growth at this location is not entirely clear at the current time, given the rural location and the lack of identified need at the borough-scale. Also, some existing manufacturing and aeronautical businesses on-site would not be compatible with nearby homes. The site promoters suggest: “*Only 6 of the existing 59 businesses require the use of the airport or runway... The existing employment buildings will be renovated and redeveloped to suit modern ways of working and meet the future needs of both existing and new occupiers.*” However, through the previous planning application process there was considerable discussion around the economic importance of the current airport use.
- 6.3.56 In **conclusion**, the strategy under Scenario 1 is thought to align with objectively assessed needs and sub-regional strategy established by the Local Enterprise Partnership (LEP), hence it is fair to predict positive effects, albeit modest given limited support for new employment land, and some notable allocations that would see change of use from employment to residential. With regards to Scenario 3, whilst the scheme would deliver new employment land to expand an existing employment area, an overriding consideration is the lack of an objectively assessed need for new employment land in the Borough.

Historic environment

Growth scenario 1 Constant supply components	Growth scenario 2 Constant supply components + smaller GB sites	Growth scenario 3 Constant supply components + Fair Oaks GV
★ 1	3	2


- 6.3.57 With regards to **Scenario 1**, Camberley town centre is notable for being associated with limited historic environment constraint; however, there are a range of other issues and sensitivities associated with the package of allocations and other SLAA sites, including: two sites (one for 65 homes and the other for 21 homes) adjacent to the Basingstoke Canal, which is a designated conservation area; support for a 15 home scheme adjacent to southern extent of Chobham Conservation Area, where there are several listed buildings; and support for further expansion to the east of West End, where there is a historic farm associated with two listed buildings. There are also several sites associated with locally listed buildings, including the proposed allocation at the northern extent of Bagshot.
- 6.3.58 With regards to **Scenario 2**, some of the shortlisted sites could extend modern housing estates into countryside with limited sensitivity (e.g. at Windlesham); however, there are concerns with respect to:
 - West End and Bisley – whilst West End is not a historic settlement, this broad area is likely to be associated with historic character, reflecting better quality soils, which presumably will have supported farming and settlement more so than broad areas associated with heathland / common land. Linked to this, it is also evident that this area benefits from a high density of public rights of way.

In particular, two shortlisted sites to the east of Bisley are in proximity to a notable cluster of listed buildings, including the grade 2* parish church, which is associated with a rural setting and a network of bridleways shown as lanes on historic maps.

There is also a need to consider the heritage value of the river/stream corridor between West End and Bisley, with the possibility of growth encroaching somewhat on the two notable clusters of grade 2 listed buildings - namely the Lucas Green cluster and the Beldam Bridge Farm cluster - although all of the shortlisted sites in question are more than c.100-200m from a listed building.

- The southern part of Chobham, in proximity to the conservation area - which is associated with a very high density of listed buildings. In particular, a scheme along Castle Grove Road could impact the rural approach to the conservation area from the south, although there would be good potential to make use of a mature roadside hedgerow / tree belt to screen the development. The scheme would involve developing the grounds of Broadford (N.B. under Scenarios 1 and 2 a 15 home scheme is assumed, which could be achieved without Green Belt release, but under Scenario 3 a larger scheme is assumed), which is shown on historic OS maps (pre-1914), although not locally listed.
- 6.3.59 Also, one of the shortlisted sites at Windlesham (Snows Ride) may be associated with a degree of sensitivity, in that it comprises a large field that is shown on historic OS maps as comprising part of the landscaped grounds associated with Windlesham Court (which remains, but is not locally listed).
- 6.3.60 With regards to **Scenario 3**, the Fair Oaks Vision Document presents fairly detailed analysis, and it seems clear that whilst the site is not without its constraints, there would be good potential to avoid and mitigate impacts through masterplanning, landscaping and design. Key considerations likely relate to the concentration of heritage assets associated with the historic airfield use, the river valley and Ottershaw Park. A primary concern is potentially around encroachment of the proposed settlement area on the north-western sector of the parkland, as per the discussion above under Biodiversity. The Vision Document states: *“Delivery of the substantial SANG also provides an opportunity to enhance the historic landscape of the nearby Grade II Listed Ottershaw Mansion.”* However, there is a need to scrutinise this suggestion, mindful that there will be negative impacts to the western extent of the landscape. The site promoters explain: *“... key remnant landscape features associated Ottershaw Park are retained and incorporated into the proposals, in particular the woodland and Little Blackmole Pond on the eastern boundary, Samson’s Wood and Long Copse, the parkland trees, and the remaining field divisions within the eastern part of the Site.”* A final consideration is offsite impacts due to traffic and required road infrastructure upgrades, and in this respect significant concerns were raised through the previous planning application, particularly required junction upgrades in the Chobham Conservation Area.
- 6.3.61 In **conclusion**, there is certainly a concern with Scenario 2 over-and-above Scenarios 1 and 3. It is appropriate to flag a risk of significant negative effects under Scenario 2, although in practice there would likely be good potential to reduce concerns through further site selection, masterplanning and design. With regards to Scenarios 1 and 3, it is fair to highlight a concern with Scenario 3 over-and-above Scenario 1. However, significance is uncertain, ahead of receiving the views of Historic England.

Housing

Growth scenario 1 Constant supply components	Growth scenario 2 Constant supply components + smaller GB sites	Growth scenario 3 Constant supply components + Fair Oaks GV
3	2	

- 6.3.62 The primary point to make here is that all three Scenarios would enable the housing requirement to be set at 299 dpa, or 5,680 homes in total, which is the figure arrived at by subtracting the agreed unmet need provision in Hart (41 dpa over the first 13 years of the plan period, or 533 homes in total) from the Borough’s standard methodology derived LHN figure, which is 327 dpa, or 6,213 homes in total. On this basis significant positive effects are predicted for all three scenarios.
- 6.3.63 Under **Scenario 1** there would be a supply buffer over-and-above the housing requirement of approximately 7%, whilst the supply buffer would be approximately 21% under **Scenario 2** and 25% under **Scenario 3**. A larger buffer can be appropriate where the supply includes heavy reliance on challenging sites associated with delivery risk. However, it is nonetheless the case that, under Scenarios 2 and 3, there could be the potential to explore a reduced supply buffer and, in turn, a higher housing requirement (in effect, a commitment to delivering more homes than under Scenario 1). This would represent a proactive approach to addressing affordable housing needs, which have been introduced in Section 5.2, and are further discussed in **Box 6.1**.
- 6.3.64 When seeking to differentiate between Scenarios 2 and 3, considerations include:

- **Scenario 2** - there is currently uncertainty regarding the precise number of homes that would be needed and could realistically/sustainably be delivered at smaller Green Belt sites. However, generally speaking, small Green Belt allocations can perform well from a 'housing' perspective, because such sites: tend to be associated with low delivery risk and, in turn, tend to be able to deliver relatively early in the plan period (albeit few of the shortlisted sites simply comprise unconstrained agricultural land); would be suited to delivering family housing (also larger homes suited to supporting home working); and could help to meet very localised housing needs at the Borough's villages (although there is no evidence to enable any such needs to be quantified in any detail).
- **Scenario 3** - the current Fair Oaks Vision Document goes into detail on the anticipated delivery timeline and, as per the finding of the Runnymede Local Plan Inspector in respect of Longcross GV (paragraph 122 of the Inspector's Report, 2020), it is fair to say that *"there are several positive factors that support this trajectory in principle"*, including *"the substantial experience of the developer in delivering large-scale projects and the attractiveness of the vision for the Garden Village"*. Also, the proposed approach of Countryside acting as Master Developer (discussed above under Communities) is supported from a delivery perspective. Also, the proposed concept masterplan includes land for Gypsy and Traveller pitches, which is an important consideration in the Surrey Heath context, given limited alternative options for meeting Gypsy, Traveller and Travelling Showpeople accommodation needs in the Borough. However, the Vision Document does not discuss the possibility of delivering any specialist accommodation (in comparison, policy for Longcross GV provides for specialist accommodation).

6.3.65 In **conclusion**, significant positive effects are predicted for all three scenarios. However, there is clear support for Scenarios 2 and 3 over-and-above Scenario 1, from a 'housing' perspective, and Scenario 3 performs most positively given: the significant local affordable housing need combined with uncertainties regarding the precise number of homes under Scenario 2; and potential for Gypsy and Traveller pitches.



Box 6.1: Affordable housing needs

As discussed in Section 5.2, affordable housing needs are explored through the Housing Needs Assessment (2020), which concludes that affordable housing needs are *"relatively high compared to overall [housing] need; this justifies the Council seeking to secure as much additional affordable housing as viably possible."*

The potential to secure affordable housing will be a focus of a whole plan viability study prior to the Local Plan being finalised for publication under Regulation 19. However, at the current time, it is important to highlight that recent experience in the Borough does serve to indicate certain challenges, with the most recent [Authority Monitoring Report](#) (2021) identifying that only 15% of homes completed since the start of the Core Strategy plan period have been affordable. Delivery in the 2019/20 monitoring year was strong, at 35.1%; however, in the 2020/21 monitoring year only 11.1% of homes delivered were affordable.

Looking beyond the top level statistics, recent experience has seen a need to agree a level of affordable housing below the policy ambition at several large sites due to viability challenges, notably: Sturt Road (ref. [20/1048/FFU](#)), which is set to provide up to 9.4% (discounted market housing), and this figure remains subject to adjustment pending further investigations on the cost of drainage solutions (and the scheme is not able to make an education contribution); and Princess Royal Barracks (a key strategic site, but subject to constraints given former MOD uses), which will deliver 20% overall, with the outstanding Reserved Matters applications to deliver 15%. Also, and importantly, it is important to note that in the 2020/21 monitoring year a significant quantity of applications came through as prior notifications for the conversion of offices to residential accommodation. Such applications do not have the requirement for developers to provide affordable housing.


Land, soils and resources

Growth scenario 1 Constant supply components	Growth scenario 2 Constant supply components + smaller GB sites	Growth scenario 3 Constant supply components + Fair Oaks GV
	2	

6.3.66 Beginning with **Scenario 1**, the proposed strategy is largely focused on previously developed land, and hence performs well. Several sites are greenfield comprising woodland or forestry, as discussed above, but none are thought to comprise productive agricultural land. Others comprise the private grounds/curtilage/gardens of existing homes/buildings in large plots.

- 6.3.67 With regards to **Scenario 2**, the shortlisted sites are all primarily greenfield sites, although only a small proportion of the sites comprise agricultural fields (others comprise woodland/forestry or private grounds/curtilage/gardens). One of the sites has been surveyed in detail to ascertain agricultural land quality (see the ‘post 1988 classification’ dataset available at www.magic.gov.uk), namely land to the east of West End (Site 813), where survey work indicates the presence of grade 2 quality land (classed as best and most versatile, BMV), although the site is currently used for forestry.
- 6.3.68 Whilst none of the other shortlisted sites have been surveyed in detail, it is noted that the nationally available ‘provisional’ agricultural land quality dataset (which is very low resolution) does show an area of better quality agricultural land in the West End / Bislely area, where there is a concentration of shortlisted sites (in addition to Site 813). Specifically, the provisional dataset shows an area of ‘grade 3’ agricultural land here, which in practice could be grade 3a (BMV) or grade 3b (not BMV) or, indeed, it could be a different grade entirely in practice (as is the case for Site 813). The rest of the Borough is shown by the provisional dataset to mostly comprise lower quality land (grade 4 or 5), as reflected in the extent of heathland commons / former commons and forestry.
- 6.3.69 Finally, with regards to **Scenario 3**, the current Fairoaks Vision Document states that the part of the site (42% of the total area) that comprises open fields has been surveyed in detail and found to comprise grade 3b quality land, i.e. land that does not qualify as BMV (although survey findings are not currently shown at magic.gov.uk). This is potentially somewhat surprising, as land to the south (McLaren Park, within Woking Borough) has been surveyed in detail and found to comprise grade 1 quality land. Regardless, a benefit of the Fairoaks GV scheme would be that some use would be made of previously developed land, with the site promoters suggesting that all of the land currently associated with the operational uses of the airport, including extensive areas of grassland either side of the runway, can be classified as previously developed. The NPPF definition is [here](#), and the site promoters suggest:
- “... the managed mown grassland surrounding the runways supports the functioning and operational activities of the airfield and runway and therefore prohibits agricultural use. It is classified as previously developed land alongside the buildings, airstrip, tarmac. This is established in the case of Dunsfold Aerodrome... where the Inspector confirmed that 83% of the Dunsfold was previously developed.”*
- 6.3.70 In **conclusion**, Scenarios 1 and 3 perform notably well from a perspective of making good use of previously developed land and avoiding loss of BMV agricultural land. In comparison, Scenario 2 would certainly lead to the loss of productive agricultural land, and potentially some that is of BMV quality.


Landscape

Growth scenario 1 Constant supply components	Growth scenario 2 Constant supply components + smaller GB sites	Growth scenario 3 Constant supply components + Fairoaks GV
	3	2

- 6.3.71 Beginning with **Scenario 1**, a range of relevant considerations have already been explored. The Borough benefits from extensive woodland and forestry, which serves to screen and contain growth locations in the landscape and leads to relatively limited concerns regarding piecemeal expansion or ‘sprawl’ over time. For example, and notably, further expansion to the east of West End would be well contained by woodland (and the boundary of the Green Belt). The SLAA identifies three small sites in the Green Belt that are less well contained in landscape terms, but the Green Belt designation should serve to ensure that development does not impact on openness, and also negate any risk prevent problematic long term development creep. Also, a small SLAA site at Mytchett appears to be associated with an open river valley landscape, but it is not clear that there are any sensitive public view points into or across the site, and the scheme would be contained by the flood zone.
- 6.3.72 With regards to **Scenario 2**, the primary point to note is that most, if not all, of the shortlisted sites are likely to fall within parcels that contribute to at least one of the nationally defined Green Belt purposes, and some of the sites are likely to perform strongly in Green Belt terms. It has not been possible to take into account the findings of the most recent Green Belt Review (see Figure 5.3) through this appraisal.

- 6.3.73 Maintaining a focus on Green Belt function, it is clear that some of the sites benefit from a degree of containment within the landscape. However, ahead of any decision to allocate there would be a need for further work to explore the potential to define a new long term defensible Green Belt boundary (any such work would need to be preceded by evidence that exceptional circumstances are likely to exist).
- 6.3.74 Considering landscape more broadly, concerns discussed above are of relevance here, including around sites that would encroach on the river valley landscape between West End and Bisley, and sites that relate relatively poorly to existing settlements in built form terms (notably sites at Bisley and Chobham).
- 6.3.75 With regards to Windlesham, one consideration is potentially the risk of problematic urban sprawl along the A30, noting the recently permitted garden centre redevelopment scheme between Snows Ride and Broomhall. However, the site in question, to the east of Snows Ride (Site 112), appears to be well-screened from the road by a tree belt, and there are no public rights of way in the vicinity (indeed, there is only one public right of way linking to Snows Ride, potentially suggestive of a growth-related opportunity).
- 6.3.76 With regards to the main Windlesham village core, further expansion to the east, into Heathpark Wood, potentially gives rise to a degree of concern, although there would presumably be good potential to utilise woodland to screen housing from the B386, and therefore maintain a sense of woodland separation between the eastern edge of Windlesham and built form further to the east, along the B386. Land to the west of Windlesham is sensitive in historic environment terms, and potentially also landscape terms (e.g. noting a high density of public rights of way), and land here has been promoted as available in the past, but there are currently no sites known to be available.
- 6.3.77 Finally, with regards to **Scenario 3**, the first point to note is that there is a need for further work to understand the contribution that the site currently makes to Green Belt purposes. However, leaving aside Green Belt, there are reasons to suggest that supporting growth here could well be preferable to the option of supporting a similar quantum of growth at village edge locations, from a landscape perspective.
- 6.3.78 The landscape merit of the site relates to the fact that it is currently an operational airfield and, whilst most airfields tend to be located on raised plateaus (e.g. Wisley), Fair Oaks is located within a river valley landscape. This should help in terms of minimising views into and across the site, and also suggests good potential for containment in the long-term, i.e. low risk of problematic 'sprawl'. Looking more closely at the site, it does appear to be very well contained in the river valley landscape, with good potential for containment: to the west by the flood risk zone; to the north by the A319, rising land and biodiversity constraint; to the east by SANG; and to the south by SANG / flood risk zone / SPA constraint.
- 6.3.79 Views across the site from the A319 and from two public rights of way that link Chobham Common to the north with Horsell Common to the south (and hence are likely to be of some strategic importance) are a further consideration, but likely to be of limited significance.
- 6.3.80 The other key consideration is the potential to greatly improve accessibility to the River Bourne valley (there is currently no footpath following the river here, unlike to the west, between the site and Chobham, hence the possibility of a coordinated landscape scale enhancement programme might be envisaged) and the remnant parkland landscapes of Ottershaw Park, where there are currently no public rights of way.
- 6.3.81 Returning to Green Belt, the site promoters emphasise that *"the NPPF, case law and Inspector's Reports... demonstrate Green Belt sites are not to be considered as a 'last resort' if they achieve sustainable development."* However, equally, paragraph 141 of the NPPF is clear that: *"Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options..."*
- 6.3.82 In **conclusion**, it is certainly fair to highlight a significant concern with Scenarios 2 and 3 over-and-above Scenario 1, noting the Green Belt constraint (Green Belt is not a landscape designation, but is valued for its openness) and wider concerns around impacts to landscapes that are likely to be associated with a degree of sensitivity (more so Scenario 2). It is a challenge to differentiate between Scenarios 2 and 3, particularly given uncertainty regarding the precise sites for allocation under Scenario 2. However, assuming a 'worst case Scenario 2', it is suggested that Scenario 3 (Fair Oaks GV) may be preferable.


Transport

Growth scenario 1 Constant supply components	Growth scenario 2 Constant supply components + smaller GB sites	Growth scenario 3 Constant supply components + Fairoaks GV
	2	2

- 6.3.83 Beginning with **Scenario 1**, there is much to commend the proposed approach to distribution from a transport perspective, as discussed above. Whilst provision for (modest) unmet needs in Hart District could lead to car trips over-and-above a scenario whereby needs are met locally, concerns are allayed on account of Surrey Heath and Hart being understood to share a housing market area.
- 6.3.84 With regards to **Scenario 2**, there are significant concerns from a transport perspective, for the reasons set out above. There can be transport arguments in support of growth at villages, for example where the effect is to support local community infrastructure, transport infrastructure (e.g. new walking or cycling paths) or bus services, but no particular opportunities have been highlighted to date.
- 6.3.85 The two northern-most shortlisted sites stand-out as being associated with the greatest merit in transport terms, with the site at Bagshot (Site 736) located adjacent to two a-roads and within 400m of Bagshot railway station, and the site at Snows Ride (Site 809) located adjacent to the A30, thereby reducing concerns regarding traffic generation and enabling good access to bus services (including to Bagshot station to the west and Sunningdale station to the east, both of which are within 2.5km; there is also a footpath along the A30, but not cycle path).
- 6.3.86 Finally, with regards to **Scenario 3**, a key consideration is thought likely to be the A320 corridor between Woking and M25 Junction 11, which is a focus of the adopted Runnymede Local Plan and the Local Plan Inspector’s Report. There are plans for significant enhancements to the road corridor; however, there is a need to establish whether these will lead to any spare capacity over-and-above that needed to accommodate committed growth within the Runnymede Local Plan and elsewhere. There will certainly be a need for detailed investigations, potentially of a similar nature to that undertaken for the Runnymede Local Plan prior to support for Longcross GV (and other allocations along the A320) being confirmed. The Inspector’s report refers to the importance of “a robust, comprehensive and transparent evidence base for the Plan”, and the following statements made within the Inspector’s Report are also of note:
- “The Plan’s implications for traffic growth and highway safety on the A320 and on the M25 have been thoroughly assessed, together with the necessary mitigation measures, so far as... is reasonable...”*
- “A revised trajectory for housing delivery at LGV was considered at the hearing in... taking account of the updated evidence on the improvements required on the A320 corridor and at junction 11 of the M25.”*
- 6.3.87 Other key matters for scrutiny are impacts to the A319 corridor, the proposed A319/A320 link road through the site, potential for trip-internalisation, public transport connectivity and offsite walking/cycling links.
- 6.3.88 In respect of public transport, there is a need to recall NPPF paragraph 138, which requires a focus on this matter when considering Green Belt release. There could well be an opportunity to enhance bus connectivity locally, with the suggesting that “the ability to integrate services with Chobham, St Peter’s Hospital and Woking should aid delivery.” The promoters also suggest that “using a methodology that has been agreed with Surrey Council... officers elsewhere, it has been shown that it would be financially viable to divert Route 446 through the site whilst at the same time increasing its frequency to at least 20 minutes.”
- 6.3.89 With regards to walking/cycling links, this is a major focus of the Fairoaks Vision Document, and it is fair to assume that support for a strategic growth location will lead to opportunities to support walking/cycling (also micro-mobility, ‘mobility as a service’ etc). Materials submitted to date do include fairly detailed commitments in respect of onsite mobility aspirations, explaining: “In short, these are perhaps best described by the emerging theory of the Sustainable Accessibility and Mobility (SAM) framework... Although important to note the SAM model is a decision-making hierarchy for transport planning and land use, physical infrastructure also includes: Co-working space as part of the local centre; Car and cycle share options; A focal point for public transit options; Infrastructure that encourages and facilitates the use of alternative fuel technology (i.e. EV charging points); Dedicated website; Interactive ‘Smartphone App’; and Conveniently located interactive information points.”

- 6.3.90 Proximity to Woking is a clear benefit, and the site promoters explain: *“The existing services and amenities of the town would be well connected to Fairoaks, which in spatial terms could be termed as a satellite settlement to Woking... The town is a key service centre with a station offering mainline railway services, leisure, community, employment uses and [is] the second largest shopping centre in Surrey after Guildford.”* However, there is a concern regarding the potential to achieve good walking/cycling links between the site and Woking. The site promoters highlight that a National Cycle Route follows the A320, and that this is set to be [upgraded](#); however, it is not clear that this is a direct route from the settlement area unless a link is created through the northeast corner of Horsell Common, and there is potentially an alternative, more direct route via the Common.
- 6.3.91 With regards to EV charging infrastructure, the site promoters commit to: *“ensuring an EV charging point is available for each home and an installation of community EV charging points in key locations.”* N.B. EV charging points are set to become a requirement of all new homes nationally]
- 6.3.92 In **conclusion**, Scenarios 2 and 3 lead to concerns over-and-above Scenario 1, although it is important to note that Scenario 1 is associated with uncertainties ahead of traffic/transport modelling. With regards to Scenarios 2 and 3, it is not possible to differentiate between the scenarios with any confidence, given that Scenario 2 is defined in somewhat high level terms, and given the need for further detailed work to confirm the transport infrastructure upgrades that are necessary and affordable under Scenario 3.

Water

Growth scenario 1 Constant supply components	Growth scenario 2 Constant supply components + smaller GB sites	Growth scenario 3 Constant supply components + Fairoaks GV
	2	

- 6.3.93 Perhaps a primary consideration is in respect of capacity at wastewater treatment works (WwTWs). There is often good potential to deliver capacity increases in support of growth; however, this can be costly and lead to delays, and there can be residual risk of capacity being breached leading to pollution of waterways. As such, it is preferable to direct growth to locations with existing capacity. Matters were explored through a Water Cycle Study (WCS) for Hart, Rushmoor and Surrey Heath councils in 2017. The study explores housing growth under various scenarios that do not necessarily relate to the scenarios currently under consideration; however, the study does highlight Chobham WwTW as having greater capacity to accept additional flows than is the case for the other two WwTWs in the Borough (Camberley and Lightwater).
- 6.3.94 In this light, a focus of growth at Bagshot, Windlesham, West End and Bisley under **Scenario 2** could potentially give rise to a degree of concern over-and-above Scenario 1, in that none of these settlements benefit from a local WwTW (leading to a need to pipe/pump wastewater, which can give rise to issues and costs) and given limited capacity at Lightwater WwTW. Whilst there is no certainty at the current time ahead of further detailed investigations, the potential for wastewater to be a significant constraint can be envisaged, particularly under a scenario whereby Green Belt sites at the settlements listed above are favoured ahead of sites at Chobham. As for **Scenario 3**, it seems likely that wastewater would flow, or be pumped, to Chobham WwTW, but this has yet to be confirmed (views of the water company are sought).
- 6.3.95 Aside from WwTW capacity, other issues relate to pollution to surface and ground water and supporting water efficiency / minimising pressure on potable water resources. However, there is limited potential to differentiate the scenarios in respect of these issues. The Fairoaks site promoters explain *“a corporate commitment to achieve water efficiency in homes of at least 105 litres per person per day or lower...”* However, some water companies now target 100 l/p/d (see [southernwater.co.uk/water-for-life/target-100](https://www.southernwater.co.uk/water-for-life/target-100)).
- 6.3.96 In **conclusion**, it is fair to highlight a degree of risk under all scenarios ahead of formal consultation with the statutory providers, and a degree of relative concern is highlighted with respect to Scenario 2.

Summary and conclusions

6.3.97 The matrix below presents a summary of the appraisal presented above. Within each row, the aim is to both categorise the performance of each of the growth scenarios in terms of significant effects (using **red** / **amber** / **light green** / **green**) and rank the scenarios in order of preference (where 1 is best performing).

Table 6.1: Summary appraisal of the reasonable growth scenarios

SA topic	Growth scenario 1 Constants only	Growth scenario 2 Constants + Small GB sites	Growth scenario 3 Constants + Fairoaks
	Rank of preference and categorisation of effects		
Accessibility	1★	3	2
Air quality	1★	2	2
Biodiversity	1★	2	2
CC adaptation	1★	2	1★
CC mitigation	1★	3	2
Communities	2	3	1★
Economy and employment	1★	3	1★
Historic environment	1★	3	2
Housing	3	2	1★
Land, soils, resources	1★	2	1★
Landscape	1★	3	2
Transport	1★	2	2
Water	1★	2	1★

Discussion

The appraisal highlights **Scenario 1** as performing best in terms of the greatest number of topics and as being associated with the fewest predicted negative effects. However, it does not necessarily follow that Scenario 1 is best performing or ‘most sustainable’ overall, because the appraisal is undertaken without any assumptions made regarding the weight, or degree of importance in the decision-making process, that should be assigned to each of the topics, nor is it safe to assume that each is of equal importance. There are a range of issues and impacts associated with Scenario 1 – both in respect of topics where the appraisal matrix flags an ‘amber’ and in respect of other topics, where the overall conclusion is neutral or positive - which are explored further in Section 9.

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

Finally, with regards to **Scenario 3**, the appraisal highlights a mixed picture, with this scenario preferable to Scenario 1 from a ‘housing’ and a ‘communities’ perspective, given affordable housing needs and a clear place-making opportunity (also, there are arguments in favour of Scenario 3 from an ‘economy and employment perspective), but giving rise to concerns over-and-above Scenario 1 in several other respects, namely:

- Accessibility – the new community would not deliver higher order facilities, e.g. a secondary school;
- Air quality – there are some local sensitivities and wider concerns that would need to be explored;
- Biodiversity – a key issue given the sensitive location of the site between two components of the TBHSPA;
- Climate change mitigation – there are questions around both transport and built environment emissions;
- Historic environment – onsite and adjacent sensitivities, plus a concern regarding road upgrades at Chobham;
- Landscape - albeit concerns potentially relate to Green Belt more so than landscape more widely; and
- Transport – impacts to the strategic road network, including the A320 and motorway junctions, would need to be carefully considered; the site benefits from proximity to Woking, but links are potentially problematic; materials submitted to date do include fairly detailed commitments in respect of onsite mobility aspirations.

Strategic growth locations can give rise to considerable opportunities to realise sustainability objectives, over-and-above piecemeal expansion of settlements. However, the proposed garden village is relatively small in scale, and there are a range of locational issues and constraints. There might feasibly be potential to address the locational challenges, but there would be costs and trade-offs involved, which would need to be fully explored. The figure below shows the latest available illustrative masterplan submitted by the site promoters.

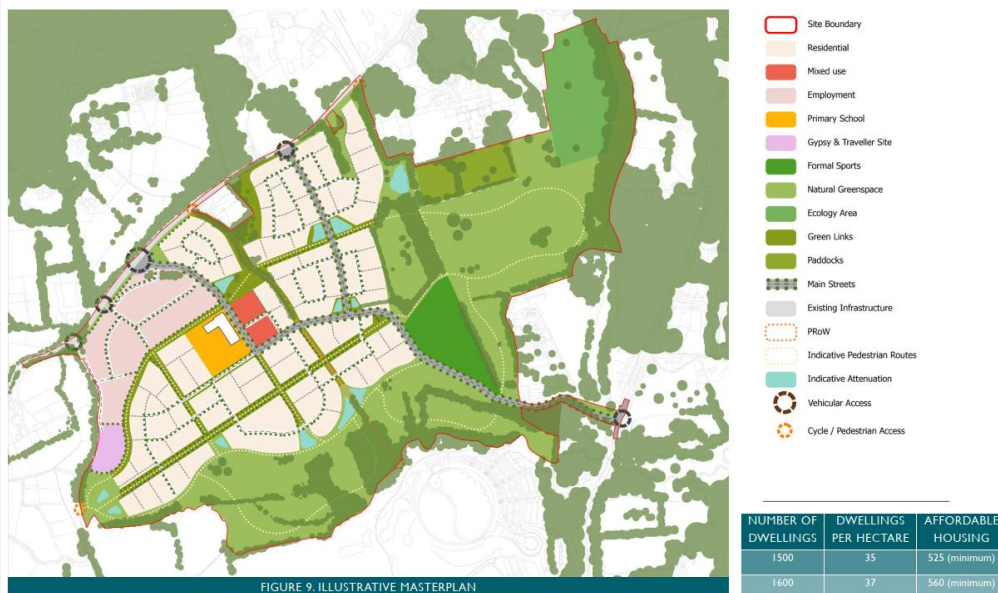


FIGURE 9. ILLUSTRATIVE MASTERPLAN

7 The preferred growth scenario

Introduction

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

Officers reasons for selecting the preferred scenario

- 7.1.2 The following statement explains SHBC Officers' reasons for supporting **Growth Scenario 1**, in-light of the appraisal. To reiterate, this statement is a response to the appraisal; it is not an appraisal:

The appraisal shows Scenario 1 to perform well in a number of respects, ranking highest or equal highest for the majority of SA topics, specifically:

- Accessibility
- Air Quality
- Biodiversity
- Climate change adaptation and mitigation
- Economy and employment
- Historic environment
- Land, soils, resources
- Landscape
- Transport
- Water

Whilst Scenario 3 does rank higher than Scenario 1 in terms of two of the SA topics (Communities and Housing), it performs poorly, relative to Scenario 1, in several respects, most notably Biodiversity, Landscape and Transport. Scenario 2 ranks below Scenario 1 under all topics other than Housing.

In summary, Scenario 1 is justified because it has no predicted significant negative effect for any SA topic, stands out as performing relatively well in a number of respects and is predicted to give rise to fewest negative effects. It is not possible to identify an alternative strategy that would perform better overall.

The primary issue in terms of which the alternatives perform better is Housing, however, the appraisal nonetheless predicts a 'significant positive effect' for Scenario 1 because the borough's assigned Local Housing Need (LHN) figure would be met, after having accounted for an element of supply via the adopted Hart Local Plan. It is recognised that there are issues and challenges around meeting affordable housing needs under Scenario 1, which will be explored through and subsequent to the current consultation, including through a whole plan viability study. It is also recognised that Scenario 1 is not without its issues and challenges more widely, as highlighted through the appraisal, and explored further in Section 9 of this report. The current Local Plan consultation document seeks to respond to growth-related issues and challenges through thematic and site-specific policies.

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

8 Introduction to Part 2

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

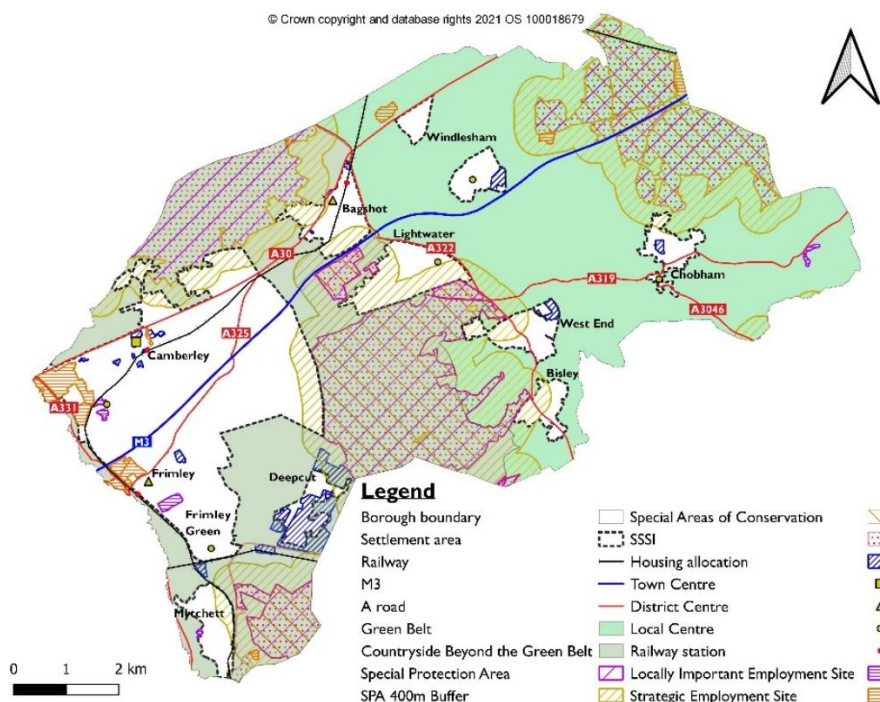
8.2 Overview of the Local Plan

8.2.1 The Draft Surrey Heath Local Plan: Preferred Options (2019 – 2038) (henceforth ‘the Local Plan’) presents policies under seven headings: Spatial strategy; Housing; Town centre, retail and economy; Infrastructure; Environment; Green Belt and countryside; and Design and heritage.

8.2.2 The appraisal focuses on proposed allocations and other sites identified as deliverable/developable by the SLAA. In other words, the appraisal focuses on the housing supply that has been identified for the purposes demonstrating that needs will be met. Proposed allocations are those deliverable/developable SLAA sites with a capacity of 25 homes or more, and are set out in Policy H1, as supplemented by Policies H2, H3 and H4. Proposed allocations are also shown on the Key Diagram, which is reproduced below. It is also important to note, at this stage, that the following allocations are entirely or largely committed, such that they do not need to be a focus of the appraisal to the same extent as non-committed sites:

- Land west of Sturt Road, Frimley Green (Site 557) - full consent for 160 homes;
- 134 and 136 London Road, Bagshot (Site 181) – outline consent for 26 homes;
- Housing Reserve Site, East of Heathpark Drive, Windlesham (Site 177) outline consent for 116 homes;
- 84-100 Park Street (Site 865) - benefits from planning permission for 61 sheltered apartments. However, the site has been identified as being suitable for a revised, residential (C3) development scheme.
- Mindenhurst, Deepcut (Site 567), which comprises the former Princess Royal Barracks, is a key strategic site in the Borough. A hybrid Planning Permission was granted in 2014 (application no. 12/0546) for 1,200 residential units and other uses including retail and community facilities, and public open space. Since that time there have been a series of S73 applications and Non-Material Amendments providing alterations to the scheme as originally submitted. The Phase 1 Reserved Matters and site wide Design Codes were approved in 2016 and development of the first residential units commenced in 2018-19. Further phases of the development including supporting infrastructure have also been approved. Proposed Local Plan Policy H4 aligns with extant planning consent.

Figure 8.1: The Key Diagram



8.3 Appraisal methodology

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

9 Appraisal of the Local Plan

9.1 Introduction

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

9.2 Accessibility (to community infrastructure)

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

Discussion

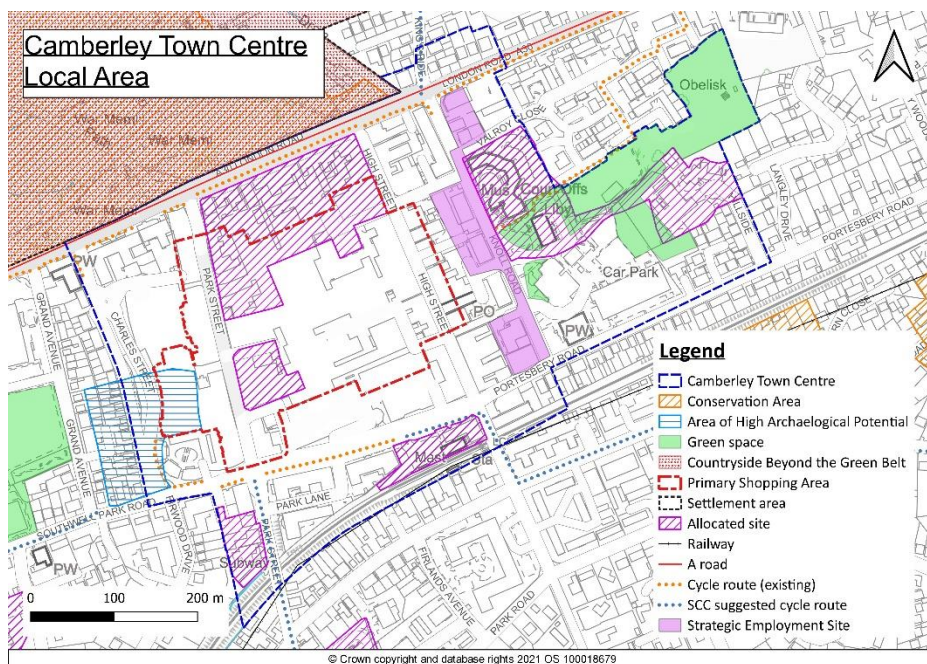
- 9.2.2 The fact that the great majority of supply is from sites located **within existing settlement boundaries** serves to indicate a tendency toward relatively accessible locations; and there is a clear focus of growth at Camberley, Frimley and Frimley Green, which are the parts of the Borough that benefit from highest levels of accessibility. 52% of the capacity identified through the SLAA (i.e. proposed allocations and smaller sites identified as deliverable or developable and therefore contributing to borough-wide supply) is within Camberley, which rises to 61% with the addition of sites in Frimley.
- 9.2.3 Focusing on **Camberley town centre**, the proposed strategy - as understood from the Local Plan and the SLAA - is broadly supported from an accessibility perspective. Policy HA2 (London Road Block; 550 homes) is of primary importance, with the policy including a detailed section setting requirements in respect of “Commercial and Community Uses”. The supporting text explains, amongst other things: *“Regeneration of the London Road Block will improve the integration of services for the public... development provides an opportunity to deliver a dynamic and sustainable area for living, working and visiting, with direct pedestrian links to the Square Shopping Centre, the High Street, Camberley Station....”*

9.2.4 Policy HA3 (Land East of Knoll Road Site Allocation; 475 homes) then deals with the other centrally important town centre allocation, although the proposal here is not to deliver a mixed used scheme to include commercial and community uses, but rather a scheme focused on residential, supporting infrastructure, public realm and the protection and enhancement of the existing designated green space. The result will be a considerable reconfiguration of uses within the town centre, given the extent of existing community uses on-site. However, these are matters that have been explored through town-centre studies over recent years, including through the adopted Town Centre AAP, and can be given further detailed consideration ahead of plan finalisation. It is important to note that the site allocation policy for this plan is for the first phase of a likely wider scheme. The plan document explains:

“The allocated site comprises a 2.44 hectare area, which currently comprises the Surrey Heath Borough Council offices, Camberley library, and the former Portesbury School. Camberley Theatre and the Knoll Road Multi-Storey Car Park, amongst other uses, adjoin the site to the south-east, comprising a further 1.77 hectare area. The further opportunity area is expected to be developed beyond the plan period and is therefore not allocated in this Local Plan. The further site area will be reassessed in terms of its deliverability during any Local Plan review.”

9.2.5 With regards to the other two town centre allocations (Land East of Park Street, North of Princess Way (former House of Fraser), 120 homes; and Camberley Station, 75 homes), there is a clear focus on aligning with the overarching strategy for the town centre. For example, proposals for the former site are required to support *“the broader regeneration of Camberley Town Centre, providing a contemporary and sustainable development that delivers an attractive and accessible public realm, including integrated services for the public.”* It is recommended that the reference to ‘integrated services’ is clarified.

Figure 9.1: Proposed town centre designations



9.2.6 Elsewhere within the **urban area** there are three further proposed allocations and, in each case, site specific policy seeks to ensure that opportunities to improve permeability and links to key destinations area realised. The largest is Sir William Siemens Square, Chobham Road, Frimley (200 homes), where the requirement is to *“incorporate improved pedestrian and cycle access to, and through, the site, with appropriate linkages to Frimley District Centre and the Station.”* Also of note is the existing community use onsite at Camberley Centre, France Hill Drive, Camberley (35 homes), with the requirement to *“retain the existing educational community use on-site, or re-provide the use at a suitable off-site location.”*

9.2.7 Aside from the proposed allocations, one smaller SLAA site of note in the urban area is Site 329, which is located next to Frimley Green local centre and proposed for a relatively high density scheme of 17 homes.

9.2.8 Across the **villages** the primary focus of growth (both ‘new’ sites and in total) is at Bagshot (which benefits from a district centre and public transport connectivity) and at Deepcut (where new community infrastructure is coming forward as part of the Princess Royal Barracks strategic scheme, although this is otherwise quite a rural area). Taking the proposed non-committed allocations in turn:

- Bagshot Depot and Archaeology Centre, London Road, Bagshot (50 homes) – the site-specific policy is brief, with just one criterion (on the historic environment), but it is recognised that this site benefits from excellent proximity to Bagshot rail station.
- Land east of Benner Lane (partial Housing Reserve Site), West End (73 homes) – a requirement to *“provide linkages to West End Local Centre through improved pedestrian and cycle access to the site.”* The local centre is over 500m distant, although the site does benefit from an adjacent primary school.
- Land at Frimhurst Farm, Deepcut Bridge Road, Deepcut (65 homes) – the site is separated from the Mindenhurst / Princess Royal Barracks strategic scheme by the Basingstoke Canal, but is within 500-600m of the forthcoming local centre, and there appears to be a good footpath link along the road.
- Chobham Rugby Club, Windsor Road, Chobham (91 homes) – a detailed site specific policy requires:
 - “Secure a suitable alternative location for the re-provision of the existing community and recreational uses on-site, within the Borough, which would be secured through an S106...”
 - “Retain an appropriate provision of open green space on-site to be accessible by local residents, which is well-integrated into a network of green infrastructure throughout the site.”
 - “Deliver a site layout that encourages permeability throughout the site and incorporates suitable pedestrian and cycle access from the site to nearby community facilities; in particular, to encourage linkages to the south toward Chobham high street.”

9.2.9 With regards to smaller deliverable/developable SLAA sites within villages, none give rise to any major concerns in respect of accessibility, and it is noted that proposed densities/capacities set out in the SLAA do respond to accessibility levels. For example, with regards to Site 908 at Lightwater the SLAA explains: *“Surrounding densities approximately 30-35dph, but as the site contains substantial built form and is close to Lightwater Local Centre, partial flatted development could be considered.”* However, Sites 236 and 573 at Bisley are notable for being located near to the southern extent of the settlement, around 800m from the neighbourhood parade located near to the northern extent of the village.

9.2.10 Finally, and importantly, there are several small sites within the **CBGB** that are not adjacent to a settlement boundary, specifically:

- Bagshot - Sites 407, 408 and 901 are located to the south of the village, over 1km from the district centre, although there is a cycle path along the A30, and also potentially good bus connectivity.
- Deepcut - Site 757 is a relatively large site located to the south of the Basingstoke Canal, with the SLAA identifying capacity for 21 homes. There will be a need to carefully consider footpath connectivity to Deepcut and/or Frimley Green, e.g. considering the narrow footway along Deepcut railway bridge.
- Lightwater / Windlesham - Site 834 is located in the Green Belt between the two villages, but the SLAA explains the potential to deliver seven homes on PDL without GB release. There is a footpath along the road to Lightwater, but this is narrow and near non-existent over the bridge crossing the Windle Brook.

9.2.11 With regards to **thematic policies**, a wide range of policies are supportive of accessibility objectives, and none are identified as giving rise to any notable tensions. Policy **CTC1** (Camberley Town Centre) is considered to be of particular importance, recognising that there could potentially be significant windfall development in the town centre over the plan period, and it will be critically important that any such schemes come forward in line with an established strategy. The supporting text to the policy explains that key challenges relate to legibility, public realm and service areas, and the policy then seeks to respond to these challenges, mindful of the wider context in respect of (the linked matters of): Covid19 recovery; online retail; and new permitted development rights, which mean that there is much greater flexibility for changes of use in town centres without the need for planning permission. One important consideration, amongst others, relates to definition of the Primary Shopping Area (PSA), informed by the Town Centre Uses Study (2020). A consolidated PSA is defined by Policy **CTC2**, with the supporting text explaining:

“Whilst the need to be flexible and adaptable is recognised, the vitality of the town centre can be impaired when the core retail frontages are fragmented. A study by KPMG on the impact of Covid-19 on town centres recognised that ‘shoppers are attracted to a cluster of shops rather than a single stand-alone outlet’. As some control over changes of use will remain where planning permission is required, the Council considers that it remains appropriate to seek to retain a retail core where the impact of a change of use on the vitality and viability of the centre can be considered. This is consistent with the NPPF 2021 which supports defining primary shopping areas and policies for the uses that will be permitted.”

- 9.2.12 A range of other policies within the ‘Town Centres, Retail and Economy Policies’ section of the Local Plan are also relevant, and supportive of ‘accessibility’ objectives. Policy ER6 (Frimley Park Hospital) is of particular note, which supports development proposals *“for the retention and improvement of healthcare facilities... [that] form part of a comprehensive development strategy or business plan...”*

Conclusion

- 9.2.13 The reconfiguration and regeneration of Camberley town centre represents a considerable opportunity to maintain and enhance the town centre’s community function, ensuring that it retains its role as the primary community infrastructure hub within the Borough, is an attractive place to visit and spend time and is easily permeable and navigable on foot. All five town centre allocations represent important components of the overall strategy (albeit one of these is already committed), in particular the two largest allocations, namely London Road Block (which will see an underused site in a town centre core location become a new central focus of the centre) and Knoll Road (which is at the edge of the town centre, and currently comprises a range of uses). Elsewhere there are limited community infrastructure opportunities set to be realised through the proposed growth strategy, and a further consideration is the proposal is to support housing growth at several small sites not linked to settlement boundaries, and hence in less accessible locations, although these sites together comprise only a small element of the overall strategy. With regards to site specific policies, there is a clear focus on use mix and realising opportunities for increasing pedestrian permeability and improving offsite walking/cycling links. With regards to borough-wide development management policies, numerous policies are supportive of accessibility objectives (no tensions are highlighted), with Policy CTC1 (Camberley Town Centre) considered to be particularly important.
- 9.2.14 Overall, ‘**positive effects of limited or uncertain significance**’ are predicted. It is worth highlighting that benefits will largely be felt in the long term, given the time that the town centre sites will take to come forward (and Land East of Knoll Road phase two is programmed for the next plan period), hence it will be important to maintain a focus on ‘easy win’ opportunities for supporting the town centre in the shorter term.

9.3 Air quality

- 9.3.1 Sustainability objectives include:

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

Discussion

- 9.3.2 None of the proposed sites intersect an AQMA; however, several are in proximity to a main road and/or a railway line, which could suggest a risk of problematic air and/or noise pollution, plus there is a need to consider other potential pollution sources, including employment uses. The following sites are of note:
- **Bagshot** - Site 247 is adjacent to two a-roads (the A30 and the A322 dual carriageway) and the railway. Through an early iteration of this appraisal it was recommended that site specific policy might be expanded to cover the matter of pollution from these sources, and this recommendation was then actioned. Also, several other small sites are located adjacent to the A30.
 - **Camberley** – several sites are adjacent to the A30 or the railway, although none are in close proximity to the M3 (this is similarly the case for Frimley, to the south of the motorway). Site specific policy for Camberley Station (75 homes) requires that proposals: *“be informed by the results of a full Noise Impact Assessment that considers the proximity to the railway line.”*
 - **Deeput** – two sites flank the railway line, one of which is a proposed allocation in the plan (65 homes) and one of which is not (21 homes). The proposed site specific policy requires that proposals: *“demonstrate that the detailed site layout has been informed by the proximity to the railway flanking the southern boundary of the site regarding safety, noise, and visual barrier effects... [and] retain and strengthen the existing tree planting and landscape buffering between the site and the railway line on the southern boundary of the site, to reduce noise and visual impacts from the railway.”*
 - **Windleham** – Site 844 (9 homes) is near adjacent to the M3 (this is the only deliverable or developable SLAA site in proximity to the motorway, which is overall a strategy that is supported, noting experience from elsewhere, for example Longcross Garden Village in Runnymede Borough).

- 9.3.3 With regards to the risk of growth leading to traffic through an AQMA, or otherwise exacerbating or creating problematic air and/or noise pollution, it is difficult to draw strong conclusions ahead of detailed traffic modelling. However, there will clearly be a need to ensure that a relatively high growth strategy for the main **urban area** does not lead to issues. With regards to parking, the proposal for the two main town centre allocations (1,072 homes in total) is as follows:
- East of Knoll Road - “... provision in accordance with adopted parking standards, providing adequate public, private and on-street vehicle and cycle parking to meet the needs of residents and visitors”.
 - London Road Block- “provide suitable, well integrated parking provision in accordance with adopted parking standards for the proposed land uses, along with provision of adequate public car and cycle parking to serve the wider town centre and to meet the needs of residents and visitors”.
- 9.3.4 Following transport modelling it will be important to give consideration to the possibility of air quality impacts both within and outside of the Borough. It is noted that Surrey County Council stated the following through the Issues and Options consultation in 2018: “It is suggested that specific reference is included in the Local Plan to the joint working being undertaken in key areas, including the Blackwater Valley, to produce a plan for action to reduce the high levels of NO₂, with partners including...”
- 9.3.5 With regards to **thematic policies**, none give rise to any notable tensions with air quality objectives, whilst Policy **E4** (Pollution and Contamination) sets out to ensure that development “does not give rise to, or would be subject to, unacceptable levels of pollution...” Another policy of note is Policy CTC1 (Camberley Town Centre), for example the requirement to deliver “a safe, healthy and accessible environment, supporting the 20 Minute Neighbourhood principles”. It is recommended that consideration is given to opportunities to support last mile deliveries by non-car modes.

Conclusion

- 9.3.6 Ahead of transport modelling it is not possible to confirm whether or not the proposed growth strategy will lead to increased traffic through a known air pollution hotspot (which principally means an AQMA). However, early indications are that issues/impacts are limited, mindful that many areas experiencing problematic air pollution are set to see an improving situation over the plan period – all other things being equal – due to the national switch-over to electric vehicles (although issues with particulates will remain, including from brake, tyre and road wear, mindful of heavier EVs). Regardless, there is a need to carefully consider proposed allocations in proximity to the M3 (just one small site for 9 homes), busy a-roads and/or the railway lines, both from an air quality and a noise/vibrations perspective. With regards to site-specific policies, there is a requirement to consider noise impacts where necessary, although there could be the potential for further detail, e.g. specifying parts of the site that should be left undeveloped. With regards to borough-wide development management policy, in addition to the pollution focused policy (Policy E4), policy for Camberley town centre is of note, including for supporting 20 minute neighbourhood principles. Overall, whilst there are certain tensions with air/noise pollution objectives, **neutral effects** are predicted from a borough-wide perspective.

9.4 Biodiversity

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

Discussion

- 9.4.2 Biodiversity is a centrally important constraint to growth in Surrey Heath, given the Borough’s close association with the internationally important Thames Basin Heaths Special Protection Area (TBHSPA).
- 9.4.3 The first point to note is that whilst all proposed sites are beyond the **400m TBHSPA buffer zone**, several are located not far beyond. There is confidence in the strategy for avoiding / mitigating effects, and this matter is a focus of detailed consideration through a Habitats Regulations Assessment (HRA). However, there will be a need for further consideration following consultation with Natural England and other organisations with an interest in the SPA and wider matters relating to biodiversity and nature recovery.

- 9.4.4 The next matter for consideration is then the risk of impacts to the nationally designated **Basingstoke Canal SSSI**, with two sites wholly or partly adjacent. However, these schemes are modest in scale, and low proposed densities serves to indicate good potential to maintain the mature trees onsite, particularly those adjacent to the canal. A design cue might be taken from the nearby committed Princess Royal Barracks strategic site, which is delivering a woodland buffer between new homes and the canal.
- 9.4.5 The next matter for consideration is growth in proximity to locally designated Sites of Nature Conservation Importance (**SNCI**s), including one site at Deepcut that is adjacent to the extensive woodland SNCI between Deepcut and Frimley (mostly MOD land), and it is noted that this site includes extensive tree cover. However, this is a small site for just 17 homes. There is also a sensitivity along the Blackwater Valley at Mytchett, where there are two SLAA sites (23 homes in total) closely associated with the river corridor, including a site for 7 homes adjacent to an SNCI that also intersects woodland priority habitat.
- 9.4.6 Finally, there is a need to consider sites intersecting woodland **priority habitat** or tree preservation orders (**TPO**s) or otherwise with extensive **tree cover**. There are several such sites, including proposed allocations (discussed below) and smaller SLAA sites at Bagshot, Camberley, Deepcut, Frimley, Mytchett and Windlesham. For example, Site 408 at Bagshot comprises woodland shown on the pre-1914 OS map, and around half is shown as priority habitat by the nationally available dataset. Also, at Camberley, Site 717 is covered by an area TPO, whilst Site 801 is described as being located in a “verdant” area with “*vigorous hedge boundaries.*” Matters relating to onsite woodland and trees are discussed further below.
- 9.4.7 Focusing on non-committed **proposed allocations**, the following are of particular note:
- Land east of Benner Lane (partial Housing Reserve Site), West End (73 homes) – intersects a significant area shown as priority habitat by the nationally available dataset and other mature woodland/forestry (not shown as wooded on the pre-1914 OS map). Site policy requires proposals to “*incorporate a significant landscape buffer along the eastern edge of the site... helping to preserve the rural character...*”
 - Land East of Knoll Road, Camberley Town Centre (475 homes) – is sensitive on account of significant onsite mature trees and greenspace, including areas of priority habitat and a small area of TPO. Policy HA3 requires, amongst other things: “*a green corridor incorporating Camberley Park and The Obelisk, which will form part of the wider green infrastructure network in Surrey Heath, enhancing the ecological value of the site’s surroundings and contributing to overall biodiversity net gain.*”
 - Land at Frimhurst Farm, Deepcut Bridge Road, Deepcut (65 homes) – is adjacent to the Basingstoke Canal SSSI, hence a low development density is proposed and site-specific policy requires that proposals “*demonstrate that the proximity of the site to the Basingstoke Canal SSSI has been taken into consideration.*” An early iteration of this appraisal recommended that the policy might be supplemented with added detail, including mindful of mature trees potentially supporting the functioning of the SSSI, and this recommendation was subsequently actioned.
 - Sir William Siemens Square, Chobham Road, Frimley (200 homes) - does not intersect TPOs, but the site-specific policy requires: “*contribute to the urban greening of the area, providing integrated amenity roof terraces and/or atrium courtyards within the envelope of the development... retain the continuous green, rural character of Chobham Road, including the retention of mature trees...*”
 - Camberley Centre, France Hill Drive, Camberley (35 homes) – does not intersect TPOs, but does include significant onsite trees, hence policy requires: “*retain as far as practicable the existing abundance of trees and landscaping, which contributes to the local distinctiveness of the site.*”
- 9.4.8 It is also noted that policy for one of the committed allocations (134 and 136 London Road, Bagshot), which presumably aligns with the conditions of the planning permission, includes notable detail on TPOs: “*provide high-quality landscaping and usable private and communal amenity spaces, whilst avoiding future pressures to remove TPO trees.*” This potentially serves to highlight a matter that warrants being given early consideration through site-specific policy for other sites, with a view to avoiding issues down the line.
- 9.4.9 Finally, there is a need to consider one particular site identified as developable by the SLAA, but not allocated in the Local Plan on account of the capacity falling below the 25 homes threshold, namely **Land North of Guildford Road, Deepcut** (Site 757; 21 homes). This site is sensitive on account of intersecting the TBHSPA buffer (also seemingly well linked by public right of way to the SPA, although the part of the SPA that is open access land is also MOD land with managed access), being located adjacent to the Basingstoke Canal SSSI and being heavily wooded, with the nationally available dataset suggesting that almost the entire site comprises priority habitat woodland (the site is shown as comprising wooded ‘old gravel pits’ on the pre-1914 OS map).

- 9.4.10 It is recommended that consideration be given to formal allocation of this site, despite falling below the 25 homes threshold, in order to ensure that the anticipated number of homes can be delivered alongside measures sufficient to avoid and mitigate undue biodiversity impacts, also mindful of in-combination effects with nearby Land at Frimhurst Farm (65 homes).
- 9.4.11 With regards to **thematic policies**, none give rise to any notable tensions with biodiversity objectives, and the following should assist with mitigating growth related issues/impacts and realising benefits:
- Policy **E1** (Thames Basin Heaths Special Protection Area) – confirms the well-established arrangements for ensuring that development does not give rise to adverse effects on the SPA.
 - Policy **E2** (Biodiversity and Geodiversity) – includes an important focus on Biodiversity Opportunity Areas (BOAs) as a key geography, within which development proposals should take account of established conservation objectives. There will be a need to consider whether compensatory habitat enhancement / creation measures, necessary as part of the biodiversity net gain regime, should be directed to BOAs ahead of a Local Nature Recovery Strategy (LNRS) covering Surrey Heath. It is noted that the Local Plan commits to a Climate Change and Green Infrastructure SPD.
 - Policy **E3** (Biodiversity Net Gain) – importantly requires going beyond the 10% national requirement set out in the Environment Act, requiring that: *“Development proposals will be permitted provided that they can demonstrate the provision of a minimum 20% increase in biodiversity units when set against the baseline biodiversity value and be in accordance with national guidance.”* One matter for detailed consideration is the potential to secure offsite biodiversity units within SANG, recognising the importance of not conflicting with the priority recreational function of SANGs.
- 9.4.12 The other key policy for consideration here is Policy **IN5** (Green Infrastructure), which includes a particular focus on the importance of securing a *network*, seeking to avoid *“loss or fragmentation of existing green infrastructure assets/components or compromise the integrity of the green infrastructure network...”*

Conclusion

- 9.4.13 There are some concerns with several sites, including sites in proximity to the TBHSPA (albeit outside the 400m buffer), the Basingstoke Canal SSSI and SNCIs, and a number of sites intersect woodland or contain extensive mature trees. It is recognised that there are also a number of site specific opportunities, particularly in respect of urban greening, and that borough-wide thematic and site-specific policy is proposed to avoid and mitigate negative effects, and the proposal is to secure significant biodiversity net gain. However, at this stage in the plan-making process, it is appropriate to flag **‘a negative effect with limited or uncertain significance’** noting the inherent sensitivity of the Borough. A recommendation is made in respect of one SLAA site at Deepcut for 21 homes that may warrant a formal allocation and site-specific policy, despite falling below the 25 homes threshold that triggers a Local Plan policy, to reflect sensitivities. The views of biodiversity focused organisations, including Natural England, the Wildlife Trust and the Woodland Trust, will be sought through the current consultation and considered ahead of plan finalisation, to ensure that the Local Plan growth strategy both minimises negative impacts on biodiversity and realises strategic opportunities as far as possible, ahead of a Local Nature Recovery Strategy (under the Environment Act) for Surrey or another geography covering the Borough.

9.5 Climate change adaptation

- 9.5.1 Sustainability objectives include:
- Minimise the risk of flooding
 - Encourage reduced water consumption

Discussion

- 9.5.2 The primary consideration here is flood risk, with other climate change adaptation considerations (see discussion in [Appendix 1](#) of the Climate Change Study, 2020) considered under other topic headings.
- 9.5.3 The primary point to note is that Site 912 at **Mytchett** significant intersects flood zone 3. However, the proposed capacity (16 homes) amounts to a low density (10.7 dph), hence it should be possible to avoid development in the most at risk parts of the site. The second point to note is that several sites modestly intersect flood risk zone 3, such that there is confidence in the ability to avoid built form in this zone.

- 9.5.4 There is also a need to consider **flood risk zone 2**, which should be avoided if possible, mindful of the risk of increased flood risk under climate change scenarios (see [Section 9](#) of the Climate Change Study, 2020). Several sites do significantly or entirely intersect this zone, hence there is a degree of concern, but it will be for the Environment Agency to comment in detail through the consultation. Sites include:
- **Bagshot** – one of the small SLAA sites to the south of the town (Site 317) is entirely within flood zone 2, and partially in flood zone 3. The SLAA capacity of 20 homes amounts to 133 dpa, with the SLAA explaining: “25 dwellings, as suggested by the site promoter, is considered high given character, context and flooding issues. However, flatted development may be appropriate as the site is adjoined by 3 storey flatted development.” It is recommended that consideration is given to a formal allocation and site specific policy, to ensure that steps are taken to avoid and mitigation (e.g. through design) flood risk.
 - **Camberley** – Site 878 is entirely within flood zone 2, with the SLAA explaining: “Capacity as approved (expired) planning permission.”
 - **Chobham** – Site 548 is located to the Green Belt to the south of the village, and intersects flood zones 2 and 3. However, the SLAA identifies capacity only at one part of the site, explaining: “Part of site (parcel A) is previously developed and contains some existing structures. A significant part of parcel A is not within EA flood zones 2 or 3. Therefore, some development would be suitable at parcel A...”
- 9.5.5 A further consideration is **surface water flood risk**, with the primary consideration potentially Camberley town centre and land adjacent to the railway line that passes through the urban area. Another flood risk consideration can be the risk of development leading to increased surface water run-off and/or reduced flood water storage capacity and, in turn, increased **downstream flood risk**. However, it is difficult to reach strong conclusions given potential to deliver sustainable drainage systems (SuDS). Downstream flood risk may be a consideration in respect of Site 912 at Mytchett, given extensive residential areas affected by flood risk downstream (in Guildford Borough), and the in-combination impact of growth at West End on downstream flood risk could also be a consideration, although there are few properties at risk.
- 9.5.6 With regards to **thematic policies**, none give rise to any notable tensions with climate change adaptation objectives, and a wide range of policies should assist with mitigating growth related issues/impacts and realising benefits, including:
- Policy **SS3b** (Climate Change adaptation) – is an overarching policy signposting to other policies, but which also sets out specific requirements, including: “Development proposals will need to demonstrate how they are maximising their adaptive capacity.”
 - Policy **E6** (Flood Risk and Sustainable Drainage) – sets out to “ensure that development in the Borough reduces flood risk and minimises the impact of flooding”, including by steering development to the areas with a lower risk of flooding. There is also a notable proposal to “safeguard the ‘undeveloped’ flood zone for flood management purposes with the exception of the provision of essential infrastructure.”

Conclusion

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

9.6 Climate change mitigation

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

Discussion

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

- 9.6.3 As discussed in Section 5.3 and Section 6, strategic growth locations can give rise to an opportunity to minimise built environment emissions, hence the regeneration of Camberley town centre represents an opportunity. The four proposed allocations are somewhat distributed across the town centre, but still located in relatively close proximity, such that consideration might be given to a heat network linking two or more sites (although practice is increasingly focused on smaller scale low temperature heat networks).
- 9.6.4 Decarbonisation is a focus of site specific policy for the two large sites. Specifically, at both sites the requirement is to *“utilise net zero carbon design, including on-site renewable energy and/or decentralised energy generation.”* Also, schemes: *“... will be required to meet a net zero carbon output through either on-site renewable energy provision, decentralised energy generation, or a combination...”*
- 9.6.5 With regards to the wider package of identified sites, all are modest in scale such that there is little reason to suggest any particular built environment decarbonisation opportunity. An important consideration locally is understood to be the implications of grid constraints for EV charging; however, it is not possible to differentiate between sites in this respect. Another consideration is support for reuse of existing buildings, as opposed to demolition and rebuild, and it is recommended that opportunities for reuse are explored.
- 9.6.6 With regards to **thematic policies**, none give rise to any notable tensions with climate change mitigation objectives, and a wide range of policies should assist with mitigating growth related issues/impacts and realising benefits. In particular, there is an overarching strategic policy supported by two detailed policies in the ‘Environment’ and ‘Design and heritage’ sections of the Plan, as follows:

- Policy **SS3a** (Climate Change mitigation) sets out a helpful framework of key issues and objectives. One notable requirement is to ensure *“no net loss in the carbon storage capacity provided by the Borough’s trees”*, hence there will be a need to carefully consider loss of mature trees within development sites.

Another notable requirement is to *“manage construction waste effectively and responsibly to reduce the carbon emissions of construction activities, set out in policy DH8.”* This is an important consideration, with an increased focus nationally and internationally on minimising ‘non-operational’ building emissions, including by reusing existing buildings ahead of demolition and rebuild where possible. This aligns with taking a ‘circular economy’ and ‘whole life cycle carbon’ approach to built environment decarbonisation.

Finally, the following is a key requirement: *“Development proposals will need to demonstrate how they are maximising reductions in carbon emissions and contributing to the decarbonisation trajectory for net zero by 2050... proposals for over 500 dwellings will be required to deliver zero carbon development, either through on-site measures or, if it is demonstrated that is not feasible, through carbon offsetting.”* There will be a need to carefully consider the term ‘maximising’, and the precise means by which a sufficient contribution to objectives can be demonstrated. On the matter of offsetting, it is recommended that the policy is clear that onsite emissions, and therefore the need to offset, should be minimised.

- Policy **E5** (Renewable and Low Carbon Energy and Heating Schemes) – amongst other things, requires that larger proposals *“incorporate measures to supply a minimum of 25% of the development’s energy needs from renewable and/or low carbon technologies...”* There is a need to carefully consider how this requirement aligns with the ‘fabric first’ requirement set out under Policy DH8. There is also a need to define the technologies in question, e.g. Figure 9.1 defines low carbon *heating* technologies.

*Figure 9.2: Low carbon heating technologies
From the UK Heat and Buildings Strategy (2021)*

Technology	Description
Air source heat pumps	Extract heat from the outside air to heat your home and hot water.
Ground source heat pumps	Extract heat from pipes that are buried in the ground to heat your home and hot water.
Hybrid heat pumps	Combine heat pump and standard boiler technology to heat your home and hot water. Use of smart controls help optimise the system based on cost or efficiency.
Biomass boilers	Work in a similar way to a standard gas boiler to heat your home and hot water using a renewable energy source such as wood pellets as fuel.
Solar thermal panels	Capture heat from the sun to provide hot water, typically in a storage tank.
Hydrogen boilers	Work in a similar way to standard gas boilers to heat your home and hot water but use hydrogen gas rather than natural gas as fuel. This technology is not commercially available in the UK and is dependent on the extent to which hydrogen could replace natural gas in the gas grid.
Hydrogen-ready boilers	Optimally designed to run using 100% hydrogen gas but are initially configured for use with natural gas to heat your home and hot water. Minimal component conversion is required to convert appliances to use with hydrogen. This technology is not yet commercially available.
Heat networks	Provide heat or cooling from a central source and distribute it to multiple customers in a building or across several buildings.

- Policy **DH8** (Building Emission Standards) – deals with both residential and non-residential developments, and sets out specific requirements for non-residential. With regards to residential schemes, which will comprise the great majority, there is not a specific requirement to go beyond the requirements of Building Regulations, which are set to be tightened in 2022 as an interim step towards the Future Homes Standard, but there is a requirement for *“a fabric first approach to contribute significantly towards achieving carbon emission reductions in accordance with Policy SS3.”*

Conclusion

- 9.6.7 Focusing on minimising per capita built environment emissions it is clear that the proposed strategy for growth and regeneration within Camberley town centre represents a major opportunity, and site specific policy is proposed to ensure that the opportunity is realised, although there could be the potential for further work leading to added policy detail, as opposed to deferring work to the development management stage, when it can transpire that options are more limited. With regards to the wider package of identified sites, all are modest in scale such that there is little reason to suggest any particular opportunity, in respect of built environment decarbonisation, although the decarbonisation focused policies – SS3a, E5 and DH8 – will apply. In conclusion, having taken account of proposed borough-wide thematic and site-specific policy, **neutral effects** are predicted. There will be a need for further scrutiny, both through and subsequent to the current consultation, to ensure that every effort is being made to minimise per capita greenhouse gas emissions, including through spatial strategy and site selection.

9.7 Communities

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

Discussion

- 9.7.2 Aside from matters relating to access to community infrastructure and environmental quality/health, which have been discussed above, there are wide ranging other 'communities' related considerations, including around ensuring good health, which is a national priority at the current time.

- 9.7.3 As per the discussion above, under Accessibility, a key consideration is the preferred strategy for **Camberley town centre**. Taking the four proposed allocations in turn:

- London Road Block (550 homes) – the detailed policy (Policy HA2) presents a range of detailed criteria in respect of: commercial and community uses, public realm; design and character; and infrastructure (transport, green and other). For example, and notably, there is potential to accommodate *“a library and learning centre, and other community and health uses; and cultural, civic and leisure facilities...”*
- Land East of Knoll Road Site Allocation (475 homes) – the detailed policy (Policy HA3) is notably shorter than Policy HA2, and does not include a section on commercial and community uses (because the proposed scheme is not mixed-use to the same extent as London Road Block), but it is clear that the policy is tailored to reflect the particular issues and opportunities at this site.

For example, a range of policy criteria seek to respond to the onsite mature trees and greenspace, for example the requirement for *“an attractive new streetscape throughout the site, which utilises hard landscaping to differentiate pedestrian, cyclist, and vehicular zones, and soft landscaping incorporating mature tree planting and vegetated areas... [and] a green corridor linking the site to Knoll Road and Camberley High Street, incorporating Camberley Park and adjoining woodland to the east, providing an enhanced green enclave within Camberley Town Centre, for residents and visitors to enjoy.”*

- Land East of Park Street, North of Princess Way (120 homes) – site-specific policy is strongly focused on design and wider place-making and town centre regeneration considerations, for example proposals must *“utilise high-quality architectural design to improve engagement with the street-scene, contributing to urban greenery and providing distinctive public realm within this prominent central location.”*
- Camberley Station (75 homes) – as well as a requirement for a 'new or improved train station', proposals should *“incorporate high-quality, design-led, public realm and wayfinding improvements for pedestrians and cyclists, improving connectivity to Camberley Town Centre and to both Portesbery Road and Knoll Road. Public realm improvements should focus on improving connectivity, safety, and sense of place.”*

- 9.7.4 Site specific policy for the following **other proposed allocations** is also of note:

- Camberley Centre, France Hill Drive, Camberley (35 homes) – amongst other things, the requirement is to *“implement a design-led development that is sympathetic to and integrates well with the scale, height, and character of the existing Adult Education Centre building; [and] retain as far as practicable the existing abundance of trees and landscaping, which contributes to the local distinctiveness...”*
 - York Town Car Park, Sullivan Road, Camberley (27 homes) and Sir William Siemens Square, Chobham Road, Frimley (200 homes) – are two further sites where the requirement is to *“deliver a high-quality, design-led development that is sympathetic to the existing character... [having regard to named local sensitivities, for example Frimley Village in the case of the latter site]”*
 - Land east of Benner Lane (partial Housing Reserve Site), West End (73 homes) – is adjacent to a recent/current housing growth area, hence policy requires that proposals *“be sympathetic to and integrate with the design and layout of surrounding development at the former West End Reserve Site.”*
 - Chobham Rugby Club (91 homes) – amongst other things, sets out a need to consider *“the amenity of neighbouring residential areas and to enhance the green, open character of... open space to the east.”*
- 9.7.5 With regards to package of smaller deliverable/developable SLAA sites, a key point to note is that because of their small nature these sites will often be able to deliver relatively little in the way of ‘planning gain’ to the benefit of the existing community or new residents. The appraisal of reasonable growth scenarios in Section 6 presents further discussion around the potential ‘communities’ benefits of growth at scale.
- 9.7.6 With regards to **thematic policies**, none give rise to any notable tensions with communities objectives, and wide ranging policies are supportive of communities objectives. As per the discussion above, under Accessibility, Policy **CTC1** (Camberley Town Centre) is arguably of particular importance, and one notable requirement for consideration here is the requirement for proposal to contribute to: *“delivery of a healthy and vibrant, experience based town centre [that] provides for all sectors of the community.”*
- 9.7.7 The ‘Infrastructure’ focused policies also warrant consideration here, including Policy **IN4** (Community Facilities) and Policy **IN6** (Green Space, which set out the criteria that must be met in order for the loss of existing community facilities and green space respectively to be deemed acceptable.
- 9.7.8 There is also a need to consider Policy **DH1** (Design Principles), which covers a wide range of issues, such that it might be discussed under numerous topic headings. Amongst other things, there is a focus on ‘access and inclusion’, with measures specified to ensure that developments meet the needs of all users, and also a requirement to be *“flexible towards future adaptation in response to changing life needs.”*
- 9.7.9 Finally, Policy **DH2** (Making Effective Use of Land) is of note here (but again could also be discussed under numerous other headings). The policy sets out minimum density standards, relating to accessibility, but also includes flexibility for lower density schemes where necessary, e.g. on design grounds.

Conclusion

- 9.7.10 The regeneration of Camberley town centre represents a significant place-making opportunity, including the creation of two new residential ‘quarters’ and support for new, relocated/upgraded and more accessible community facilities. Proposed site-specific policy for the four town centre allocations is strongly focused on design and wider matters relating to place-making; however, there is a degree of variation across the other proposed allocations, in respect of the degree of focus on these matters. The proposed site specific policy for Chobham Rugby Club (91 homes) appears strong. Other sites are not assigned a site-specific policy, and as small sites will be associated with more limited place-making opportunity, but will need to come forward in line with borough-wide thematic development management policies including Policy DH1 (Design Principles). Overall, **‘positive effects of limited or uncertain significance’** are predicted.

9.8 Economy and employment

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

Discussion

- 9.8.2 There is limited focus on delivering new employment land, which is appropriate given the discussion of objectively assessed needs set out in Section 5.3, but there is a carefully considered strategy for Camberley town centre, which should be supportive of its role as sub-regionally important hub of economic activity. In particular, Policy HA2 (London Road Block; 475 homes) requires a mixed use scheme to include “office floorspace comprising conventional offices and/or flexible co-working space”.
- 9.8.3 None of the proposed allocations require delivery of employment floorspace, which is potentially a matter that could be revisited subsequent to the current consultation, in light of any new evidence/understanding that might emerge, in respect of need for office and industrial employment floorspace.
- 9.8.4 There is also a need to consider sites identified as deliverable/developable for residential use within the SLAA that are currently in use for employment, albeit there is a need to be mindful of permitted development rights that can allow for a change of use from employment to residential via the prior approval process, i.e. without going through the planning application process.
- 9.8.5 A key site for consideration is Sir William Siemens Square Site, Chobham Road, Frimley (Site 907), noting that the Issues and Options document (2018) proposed allocation of a Strategic Employment Site, and the Employment Land Technical Paper (2019) supported continued use for employment, for example explaining: “It is a high quality, high profile site... The main business uses... all align with Enterprise M3’s priority business sectors.” However, the latest situation is that the site is vacant. It is recommended that consideration be given to the possibility of a mixed use scheme to include some office space.
- 9.8.6 Also, within the urban area, Sites 296 and 878 are both strongly associated with an existing employment area. Also, Site 314 comprises a builders merchants and Sites 717 and 721 comprise hotels.
- 9.8.7 Outside of the main urban area, one small site of note is Site 834, between Windlesham and Lightwater, which comprises a collection of buildings associated with Broadway Green Farm, seemingly including older farm buildings and some more modern industrial units. The SLAA explains: “all current businesses would need to relocate if the site were to be developed for residential use. The Call for Sites submission advises that although there are several business tenants, they are on short-term flexible leases...” The SLAA also explains (as it does for all sites with onsite employment): “In accordance with Core Strategy Policy CP8, the loss of employment sites will only be permitted where wider benefits to the community can be shown. This can only be demonstrated through the planning application process.” This is an important safeguard, but there is a need to consider implications for delivery risk.
- 9.8.8 Site 573 is another site currently in use for light industry, although the site has previously been granted planning permission for residential redevelopment.
- 9.8.9 With regards to **thematic policies**, none give rise to notable tensions with employment objectives, and numerous policies should assist with mitigating growth related issues/impacts and realising benefits, including the 13 policies presented in the ‘Town Centres, Retail and Economy Policies’ section of the plan.
- 9.8.10 Focusing on Policy **ER1** (Economic Growth and Investment), this sets out the framework approach, including a hierarchical approach to protecting Strategic Employment Sites and Locally Important Employment Sites. Policy **ER4** (Yorktown Business Park) then deals specifically with the largest employment site in the Borough, explaining: “Due to Yorktown’s size, redevelopment opportunities, and wide range of accommodation attracting both small and medium-sized enterprises (SMEs) and larger organisations, the site has the potential and capacity to attract future economic development...” Policy **ER5** (Rural Economy) is also of particular note, with the supporting text explaining: “There are a number of businesses located within the rural areas of Surrey Heath which make a positive contribution toward the rural economy including small rural based enterprises and a number of larger employers.”

Conclusion

- 9.8.11 There is limited support for new employment land, and some allocations that would see change of use from employment to residential, but the proposed strategy is understood to align with objectively assessed needs for employment land and sub-regional strategy established by the Local Enterprise Partnership (LEP), hence it is fair to predict ‘**positive effects of limited or uncertain significance**’. Aside from the proposed growth strategy, borough-wide thematic policies are strongly supported in that the effect will be to ensure that existing employment land and town / district / local centres are given appropriate protection against change of use to residential, as far as is possible in the context of permitted development rights.

9.9 Historic environment

9.9.1 Sustainability objectives include:

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

Discussion

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

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

- London Road Block (550 homes) – there is a notable requirement to *“incorporate buildings of no more than 3 storeys on the High Street frontage, which complement the historic Edwardian and Victorian character of this part of the town centre.”*
- Land East of Knoll Road Site Allocation (475 homes) – a key aim is “the protection and enhancement of the existing designated green space at Camberley Park including the wooded setting of the Grade II Listed Obelisk”. Further policy requires *“a design and layout that ensures new sightlines between the wooded setting of The Obelisk and the heart of Camberley Town Centre are established.”*
- Land East of Park Street, North of Princess Way (former House of Fraser; 120 homes) – the policy makes a number of points on design etc, including a requirement for proposals to provide *“flatted development above the ground-floor level at a suitable density for the town-centre location.”*
- Camberley Station, Station House, Pembroke Broadway (75 homes) – there is a requirement to *“be sympathetic to the complex surrounding context of the site with regard to scale, height, and massing. Particular consideration should be given to...”*

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

- Bagshot Depot and Archaeology Centre, London Road, Bagshot (50 homes) - proposals are required to *“demonstrate that the design of the scheme is genuinely conservation-led, having special regard to the retention and enhancement of the character of the **Bagshot Park Conservation Area** and its setting, in which the Grade II listed Bagshot Park forms the centre piece.”*
- Land at Frimhurst Farm, Deepcut Bridge Road, Deepcut (65 homes) – “deliver a high-quality, designed development that is sympathetic to the existing character of the area. Particular consideration should be given to the enhancement of the character of the **Basingstoke Canal Conservation Area.**”
- Land east of Benner Lane (partial Housing Reserve Site), West End (73 homes) - retain the **Grade II listed Malthouse Farm** and its curtilage, and preserve its setting. This is an issue that potentially warrants closer attention, with efforts potentially focused on *increasing* the value of the farmhouse as an asset that provides time depth and context to the 20th and 21st century expansion of West End. A cue could potentially be taken from the proposed site specific policy for Land west of Sturt Road, Frimley Green (160 homes), which has planning permission. The policy sets out a need to *“conserve and enhance the setting of the Grade II listed Church of St Andrews on the opposite side of Sturt Road, improving visual connections with the site. [emphasis added]”*
- Chobham Rugby Club, Chobham (91 homes) – is in close proximity to two listed buildings, but it is difficult to confidently suggest that the sports facility and pitches contributes to setting, also noting that the Chobham Club (Site 1001, 8 homes) is potentially a detracting feature.
- Camberley Centre, France Hill Drive, Camberley (35 homes) – *“retain and reuse the existing Adult Education Centre building, a **local heritage asset**, including the generous landscape setting.”*

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

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

- South of Bagshot – the four proposed small sites (one of which is adjacent to the current settlement boundary, four three of which are not) appear to be mostly associated with intensification of late 19th C or early 20th C homes in large plots, and there is one grade 2 listed building in the vicinity (potentially adjacent to a point of access for a 20 home scheme) and one locally listed building in the vicinity (adjacent to a proposed site for 8 homes). It is also noted that there is a non-designated milestone.
 - Bisley - Site 236 comprises land to the rear of three or four homes potentially with a degree of historic character, although none are locally listed and they are not shown on the pre-1914 OS map. The proposal is to support a high density scheme of approximately 80 dph.
 - Chobham - Site 548 is located outside of the proposed Green Belt inset boundary, but the site is partially PDL, such that some development could take place without the need for Green Belt release. The Conservation Area is adjacent, and the main building on the site is shown on the pre-1914 OS map.
 - Deepcut - Site 757 is located adjacent to the Basingstoke Canal SSSI and is currently heavily wooded. As per the discussion above, under Biodiversity, it is recommended that this site warrants consideration of a formal allocation and site-specific policy, despite falling below the 25 homes threshold (21 homes), noting the possibility of in-combination effects with nearby Land at Frimhurst Farm (65 homes).
 - Windlesham - Site 834 comprises a collection of buildings associated with Broadway Green Farm, seemingly including older farm buildings and some more modern industrial units. The site is located in the Green Belt between Lightwater and Windlesham, but the SLAA explains the potential to deliver seven homes without impacting on the openness of the Green Belt. A collection of farm buildings is shown on the pre-1914 OS map, although none of the buildings are designated in any way.
- 9.9.6 There is also a need to consider the matter of inseting Chobham from the Green Belt, as discussed in Appendix IV. In short, inseting could lead to a degree of additional infill although design and heritage polices will protect the village's strong historic character.
- 9.9.7 With regards to **thematic policies**, none give rise to any notable tensions with historic environment objectives, and the following should assist with mitigating growth related issues/impacts and realising benefits. The centrally important policy is Policy **DH7** (Heritage Assets), which deals with the various types of designated areas/assets in turn, including a focus on enhancing significance where possible, in accordance with national policy set out in the NPPF. The focus on the two local-level designations that deal with areas of archaeological interest is of note, as is the focus on locally listed buildings, as the approach to conserving/enhancing locally designated assets must be defined at the local level.

Conclusion

- 9.9.8 A number of sites are associated with a degree of historic environment sensitivity, but this is largely unavoidable, and borough-wide thematic and site specific policy is proposed to ensure that necessary steps are taken to avoid and mitigate negative effects and potentially realise benefits. Matters for further consideration, taking account of the consultation responses received from Historic England and other organisations with an interest in the Historic Environment, potentially include: the setting of the Basingstoke Canal Conservation Area (also accessibility and appreciation); the grade 2 listed farmhouse east of West End; and the cluster of small sites south of Bagshot. **Neutral effects** are predicted.

9.10 Housing

- 9.10.1 Sustainability objectives include:
- Meet identified housing need

Discussion

- 9.10.2 The primary point to make here is that a land supply is proposed that will enable the **housing requirement** to be set at 5,680 homes for the 19 year plan period, or 299 dpa on average, which is the figure arrived at by subtracting the agreed unmet need provision in Hart (41 dpa over the first 13 years of the plan period, or 533 homes in total) from the Borough's standard methodology derived LHN figure, which is 327 dpa, or 6,213 homes in total. On this basis significant positive effects are predicted.

- 9.10.3 The proposed **supply buffer** over-and-above the housing requirement is approximately 7%, which is considered in line with accepted practice, recognising that the strategy does not have a particularly high reliance on strategic sites (which are inherently associated with high delivery risk). However, there will be a need for further detailed work to understand delivery risks associated with numerous sites that form part of the borough-wide land supply position, both through and subsequent to the current consultation (indeed, scrutiny of matters relating to delivery risks and assumed timescales/phasing typically continue post submission). A range of site specific issues have been discussed above that could feasibly lead to viability and/or delivery challenges, for example in respect of onsite woodland / trees and onsite employment uses. It is also understood that the prevalence of current and former military operations means that ground contamination can be an issue. However, the preferred package of sites performs well in this respect, with the SLAA identifying contamination as a potential issue at just two small sites.
- 9.10.4 With regards to the **distribution and mix** of supported site, there is considered to be a good geographical spread and mix of site types and sizes. As can be seen from Table 2 in the current Local Plan consultation document, and as discussed in Section 5.4 of this report, Lightwater stands out as a settlement set to see a low growth strategy over the plan period,²⁶ but this appears to be a largely unavoidable situation, given the extent of environmental constraints. The other village set to see a low growth strategy is Bisley (where there is potentially a higher growth 'reasonable alternative'; see Section 5), although Bisley relates very closely to both West End (which is set to see relatively high growth over the plan period) and Woking.
- 9.10.5 One issue is potentially the number of sites identified by the SLAA that are unlikely to deliver **affordable housing** or where affordable housing delivery could potentially be constrained on account of abnormal development costs, mindful of NPPF paragraph 64, which states: *"Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount."* Around 25 of the sites identified as deliverable or developable by the SLAA are set to deliver 10 homes or fewer, and hence are not 'major developments'. However, the cumulative supply from these sites is a small component of the overall supply. Further discussion on affordable housing is presented in Box 6.1, above.
- 9.10.6 Another important consideration is the need for **Gypsy, Traveller and Travelling Showpeople** pitches / plots / sites, as understood from the Accommodation Needs Assessment (2020; available on the Local Plan evidence page [here](#)). Identifying land is understood to be challenging, and a matter that will need to be given further consideration prior to plan finalisation. The current proposal is to deliver pitches at one proposed allocation at Diamond Ridge Woods, Camberley. However, delivering pitches alongside 'bricks and mortar' housing can lead to challenges. Further work is required to identify more suitable sites.
- 9.10.7 A further consideration is **specialist housing**, and in this respect it is noted that the SLAA supports a total of six sites for C2 older persons / extra care accommodation. A related consideration is in respect of 84-100 Park Street, Camberley, which currently has planning permission for 61 sheltered apartments, but which has now been identified as being suitable for a revised, residential (C3) development scheme.
- 9.10.8 With regards to **site-specific policy**, criteria on housing mix are presented for the two key (non-committed) strategic allocations, specifically:
- London Road Block (550 homes) – there is a requirement to *"deliver an appropriate mix of new homes, reflecting the evidence in the most up-to-date Housing Need Assessment, whilst having regard to the Town Centre location and the need to provide flatted development.... [and deliver] a combination of predominantly flatted development and elements of townhouses, recognising the Council's ambition to significantly increase density within the Town Centre, and make efficient use of land."*
 - Land East of Knoll Road Site Allocation (475 homes) – the is a requirement is for *"an appropriate mix of new homes, reflecting the evidence in the most up-to-date housing need assessment, whilst recognising the town-centre location; flatted development adjoining Knoll Road comprising 4 – 7 storeys (inclusive), reflecting the urban character of the area; [and] an appropriate mix of townhouses and small-scale flatted development at the former Portesbery School and adjoining Camberley Park, reflecting the verdant, wooded character of the area..."*

²⁶ The focus of discussion is on growth in dwelling stock over the plan period, i.e. from 2019, but there could also be merit to understanding which villages have grown more / less over the years preceding 2019, e.g. perhaps looking back to 2011.

9.10.9 With regards to **thematic policies**, there are total of seven housing focused policies, plus there is a need to be mindful of many other policies that could lead to a cost burden on development with implications for development viability (these matters will be explored in detail through a whole plan viability study).

9.10.10 Taking the housing-focused policies in turn:

- Policy H5 (Range and Mix of Housing) – notably sets requirements for Accessible and Adaptable Homes and Self-Build and Custom Housebuilding for sites of 20 or more net new dwellings.
- Policy H6 (Specialist Housing) – is supportive of specialist accommodation, including C2 older persons accommodation, provided certain criteria are met, for example, proposals should *“not result in the over-concentration of specialist housing in a particular locality, leading to a material change in character.”*
- Policy H7 (Affordable Housing) – the headline requirement is that *“... sites of 10 or more residential dwellings, or a site area of 0.5ha and above, will be permitted that deliver 40% affordable housing.”*

Further detailed considerations are also covered by the policy, including in respect of the mix of affordable housing tenures. The following is also an important criterion: *“Viability will only be considered a constraint in exceptional circumstances and where there are significant additional costs not anticipated through the Local Plan process.”* This serves to highlight the importance of giving careful consideration to matters relating to viability through the Local Plan process.

- Policy H8 (Loss of Housing) – notably sets out that: *“Where evidenced by local needs the Council will support the retention of housing designed to meet the needs of the Borough’s older population and people with disabilities, such as single storey homes.”* A blanket presumption is an alternative option.
- Policy H9 (Rural Exception Sites) – is supportive of small scale developments of affordable housing which are outside defined rural settlement boundaries, provided certain criteria are met, including in respect of connectivity, accessibility and settlement/landscape character.
- Policy H10 (First Homes Exception Sites) – is similar to Policy H9, but deals specifically with First Homes exception sites. First Homes exception sites cannot come forward in areas designated as Green Belt.
- Policy H11 (Gypsies, Travellers and Travelling Showpeople) – sets out a policy framework for determining proposals, and also seeks to protect existing Gypsy and Traveller sites, mindful of an identified need for at least 32 pitches for Gypsies and Travellers and 14 plots for Travelling Showpeople meeting the planning definition across the plan period. The GTAA also identified a need for further pitches for Gypsy and Traveller households that did not meet the planning definition.

Conclusion

9.10.11 The Local Plan is predicted to result in **significant positive effects** given a proposed land supply sufficient to meet objectively assessed need, once account is taken of unmet need provided for through the adopted Hart Local Plan. There is also broad support for the distribution and mix of sites (both allocations and smaller sites in the SLAA), from a housing perspective. There are some challenges with the delivery of affordable housing and these will need to be explored through the whole plan viability assessment. Other key considerations relate to Gypsy, Traveller and Travelling Showpeople accommodation needs (there is a need for further work in this respect) and specialist accommodation (the SLAA supports six sites to deliver older persons accommodation).

9.11 Land, soils and resources

9.11.1 Sustainability objectives include:

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

Discussion

9.11.2 The proposed strategy is largely focused on **previously developed land**, and hence performs very well, particularly as the effect would be to minimise loss of productive agricultural land.

- 9.11.3 With regards to the three small SLAA sites in the **Green Belt**, the proposal is to support housing only on the previously developed parts of the site, such that there is no need for Green Belt release.
- 9.11.4 With regards to sites in the CBGB, several sites are greenfield comprising **woodland or forestry**, as discussed above, with none thought to comprise productive agricultural land; whilst others comprise the private grounds/curtilage/gardens of existing homes/buildings in large plots.
- 9.11.5 One site that stands out as being of particular note is **Land east of Benner Lane** (partial Housing Reserve Site), West End (73 homes), as this is a larger greenfield site, and whilst the majority of the site currently comprises woodland/forestry, the nationally available 'provisional' agricultural land quality dataset (which is very low resolution) shows an area of better quality agricultural land in the West End / Bisley area. Specifically, the provisional dataset shows an area of 'grade 3' agricultural land here; however, detailed survey work has also been completed in the vicinity (see the 'post 1988 classification' dataset at www.magic.gov.uk), which indicates the presence of grade 2 agricultural land. The rest of the Borough is shown by the provisional dataset to mostly comprise lower quality land (grade 4 or 5).
- 9.11.6 A final consideration here is loss of **greenspace** within settlement boundaries, whether in the form of sports pitches, accessible greenspace or amenity grassland. Two key sites are:
- Chobham Rugby Club, Windsor Road (Site 447, 91 homes) - the SLAA explains *"there is scope for the retention of green space and possible incorporation of additional green infrastructure on site."*
 - Former Playing Field, Lakeside School Field Lane, Frimley (Site 837, C2 accommodation) - the SLAA explains: *"A workable solution for the green space designation and the TPO trees that bound the site will be required. The capacity for the site has been reduced due to the need to find a workable solution and give consideration for the protected trees that border the site, and this could impact on the viability of the proposed extra care use. A long-term solution for the retention of existing trees and the possibilities to retain and incorporate some of the greenspace within a future scheme would be required."*
- 9.11.7 With regards to **thematic policies**, none give rise to any notable tensions with 'land' objectives, and it is noted that Policy **E2** (Biodiversity and Geodiversity) sets out that: *"Development will be expected to avoid the best and most versatile agricultural land. Areas of lower quality agricultural land should be used for development in preference to the best and most versatile agricultural land."* The key consideration is that BMV agricultural land feeds-into spatial strategy and site selection at the Local Plan-making stage.

Conclusion

- 9.11.8 The plan performs well notably well from a perspective of making good use of previously developed land and avoiding loss of BMV agricultural land. However, several sites are greenfield comprising woodland / forestry or the private grounds/curtilage/gardens of existing buildings in large plots. Overall, **neutral effects** are predicted.

9.12 Landscape

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

Discussion

- 9.12.2 With regards to **landscape**, a range of relevant considerations have already been explored. The Borough benefits from extensive woodland and forestry, which serves to screen and contain growth locations in the landscape and leads to relatively limited concerns regarding piecemeal expansion or 'sprawl' over time.
- 9.12.3 One proposed allocation that warrants stand-alone consideration is **Land east of Benner Lane** (partial Housing Reserve Site), West End (73 homes), for which the site-specific policy is set to require that proposals *"incorporate a significant landscape buffer along the eastern edge of the site that adjoins the Green Belt, helping to preserve the rural character of the area and providing a soft transitional edge to the developed area."* Providing a landscape buffer of this nature is appropriate where there is confidence in the appropriateness of setting a long-term defensible boundary.

9.12.4 The SLAA supports three small sites in the Green Belt that are less well contained in landscape terms, but the Green Belt designation should serve to ensure that development does not impact on openness, and also negate any risk prevent problematic long term development creep. Focusing on the two small sites in the Green Belt at West End, the sites are in quite close proximity, and both sites are associated with the **Trulley Brook corridor**, however there is no footpath along the brook linking the two sites. Land North of Old House Lane, which is located to the south of the village, appears to have a greater degree of existing built form on parts of the site, although there is possibly a sensitivity relating to the bridleway along the site's southern edge, plus land here falls within the landscape gap between West End and Bisley.

9.12.5 Further sites of note, in respect of landscape sensitivities, are at:

- **Mytchett** - Site 912 (16 homes) appears to be associated with an open river valley landscape, although it is not clear that there are any sensitive public view points into or across the site, and the scheme would be contained by the flood zone; and
- **Bagshot** - there is a collection of small sites along the A30 between Bagshot and Camberley. The proposal is for an intensification of built form in a sensitive part of the countryside between settlements; however, it is noted that a low density is proposed for all three sites (albeit a primary aim is to buffer the railway line, more so than the road). Also, the extent of woodland and SANG in this broad area serves to suggest limited risk of problematic sprawl in the long term.
- **Deepcut** -
 - Site 504 – the SLAA explains that the estimated capacity has been reduced from 11-17 homes to five homes, to account for “*wooded character and low surrounding densities.*”
 - Site 757 – the SLAA explains that the estimated capacity has been reduced from 52 homes to 21 homes, to account for the “*irregular shape, areas of detachment, countryside location [and] group TPO on site.*” The SLAA also explains: “*Much of the site consists of relatively dense, mature woodland.*”
 - Site 887 – the SLAA explains: “*The site currently comprises two dwellings surrounded by significant woodland. The site is 4.32 ha in total. However, an area covering 2ha of the site is indicated as the part of the site that is suitable for development... The woodland strongly contributes to the character and local distinctiveness of the area... The deep woodland belt is characterised by only a few individual residential properties...*” The SLAA then concludes: “*The current proposal is for 60 – 90 units. However, the SLAA capacity for the site is derived from the existing footprint from the development on-site, to ensure that the proposals would be sensitive to the character of the area.*”
 - Site 920 – the SLAA concludes: “*Development of the site at 30dph would provide 95 dwellings. Due to the site's heavily wooded character and location within an area of countryside that provides a gap between settlements, it is considered that capacity would need to be reduced, to retain woodland areas, and reflect the rural character of the locality. Accordingly, titles comprising wholly undeveloped woodland without residences or other buildings are deducted from the total site area, when taking account of capacity calculations... A capacity of 17 dwellings is derived, applying a lower threshold of 10dph to the remaining 1.7ha area, having regard to the rural, densely wooded character of the site.*”
 - Sites 922 and 926 are adjacent to Frimley Green, within the CBGB. The submitted capacity of the two sites is up to 20 homes, but the SLAA identifies capacity for 10 homes mindful of the “*countryside designation, the limited existing built form and small size and surrounding low densities.*”

9.12.6 With regards to **townscape**, as discussed under other topic headings above, there is a considerable focus on matters relating to urban design within the site specific policies. The following bullet points present a selection of site-specific criteria not already discussed above:

- Land East of Park Street, North of Princess Way (120 homes) – proposals must provide “*an enhanced gateway into Camberley Town Centre from Park Street, incorporating an attractive promenade that leads through to The Square Shopping Centre and an attractive link to Princess Square; [and maximise] the corner location to create an attractive, design-led, contemporary urban living environment that takes account of external views from new flattened development [and a range of other issues].*”
- Sir William Siemens Square, Chobham Road, Frimley (200 homes) – proposal are required to “*be sympathetic to and enhance the green, rural character of the neighbouring playing fields.*”
- Pinehurst, 141 Park Road, Camberley (C3 accommodation) – development proposals are required to “*incorporate high-quality landscaping, retaining and enhancing the existing treed character of the site's boundaries, which contributes to local distinctiveness.*”

- 9.12.7 With regards to **thematic policies**, none give rise to any notable tensions with landscape objectives, and several should assist with mitigating growth related issues/impacts and realising benefits, most notably Policy **E7** (Landscape Character), which sets out, amongst other things, that: *“Development proposals will be permitted which respond to and wherever possible enhance the special character, key positive landscape attributes, value and landscape setting of settlements.”*
- 9.12.8 Also of note are Policies GBC1-4, which set out the criteria under which proposals for development in the Green Belt and CBGB will be considered. With regards to GBC4 (Development within the Countryside), the policy might clarify that it applies to windfall schemes and not Local Plan allocations.

Conclusion

- 9.12.9 The proposal to maintain the current extent of the Green Belt, bar the inseting of Chobham village (see discussion in Appendix IV), is supported from a landscape perspective. The corollary is a need to focus growth in the CBGB, and the outcome is a need to support certain sites that potentially give rise to a degree of tension with landscape objectives, notably at Mytchett, Bagshot and Deepcut. However, it is difficult to predict impacts of any significance, given that the landscapes in question are not known to be particularly sensitive, and also given the potential to avoid and mitigate impacts through site layout, landscaping and design. Overall, **neutral effects** are predicted.

9.13 Transport

- 9.13.1 Sustainability objectives include:
- Encourage the use of more sustainable modes of transport (public transport/cycling/ walking) and reduce traffic congestion

Discussion

- 9.13.2 There is much to commend the proposed approach to distribution from a transport perspective, as discussed above under Accessibility and Air quality, although there are also certain tensions, e.g. support for several small sites not adjacent to a settlement boundary.
- 9.13.3 There is limited potential to comment further on matters relating to road / junction capacity at the current time, ahead of modelling work being completed. However, one immediate consideration is the risk of a high growth strategy for the main **urban area** leading to problematic traffic congestion. With regards to parking, the proposal for the two main town centre allocations (1,025 homes in total) is as follows:
- East of Knoll Road - *“... provision in accordance with adopted parking standards, providing adequate public, private and on-street vehicle and cycle parking to meet the needs of residents and visitors”.*
 - London Road Block- *“provide suitable, well integrated parking provision in accordance with adopted parking standards for the proposed land uses, along with provision of adequate public car and cycle parking to serve the wider town centre and to meet the needs of residents and visitors”.*
- 9.13.4 Also within the urban area, the proposal for **York Town Car Park**, Sullivan Road, Camberley (27 homes) is to *“retain and/or re-provide the public car-parking currently on-site”*, and it is also noted that adjacent Site 49 (8 homes) comprises garages.
- 9.13.5 Another key site is clearly **Camberley Station** (75 homes), where the proposal is to *“incorporate a new or improved train station, with associated transport interchange facilities, including car and cycle parking.”* This is also one example of a site specific policy with a clear focus on improving walking and cycling connectivity within the urban area, with the policy requiring:
- *“incorporate high-quality, design-led, public realm and wayfinding improvements for pedestrians and cyclists, improving connectivity to Camberley Town Centre and to both Portesbery Road and Knoll Road. Public realm improvements should focus on improving connectivity, safety, and sense of place.*
 - *improve interconnectivity between Camberley Train Station and the bus stops on Pembroke Broadway, through high-quality urban design, use of hard and soft landscaping, sightlines and signage.”*

- 9.13.6 The other key matter for consideration here is around safe access for cars, larger vehicles, pedestrians and cycling, with the SLAA reporting that a number of sites are associated with issues and potential challenges that will require further investigation, most notably Land at Frimhurst Farm, Deepcut Bridge Road (Site 552; 65 homes), with the SLAA explaining: *“Existing access from Deepcut Bridge Road is at a point where the road reduces to a single lane over a railway bridge, on a slight bend. Consultation with SCC would be required to establish whether it would be appropriate to upgrade the existing access point to the site, and/or whether access could be appropriately provided through establishing an alternative access point in another location.”* One other site seemingly with an access constraint, which has already been discussed above, is Site 834 between Lightwater and Windlesham. There is a footpath along the road to Lightwater, but this is narrow and near non-existent over the bridge crossing the Windle Brook.
- 9.13.7 With regards to **thematic policies**, the primary policy for consideration is Policy IN2 (Transportation) which sets out, amongst other things, supports proposals that are *“located where travel can be minimised and the use of sustainable transport modes is maximised... improve transport capacity and opportunities for travel by rail or bus transport... [and provide] safe, convenient access... for all potential users including those with disabilities, giving priority to walking and cycling routes over vehicular traffic and maximising catchment areas for bus or other public transport services.”*

Conclusion

- 9.13.8 The proposed strategy reflects the hierarchy of settlements/centres with a particular focus on Camberley town centre, which leads to strong performance in terms of transport objectives. Also, there is a clear focus within site specific policy on taking targeted steps to ensure permeability within and through sites and improving walking and cycling links within the main urban area. Transport/traffic modelling is required to assess the capacity of roads and junctions to accommodate the increased traffic that will result from the growth strategy, and there is also a need for further work to confirm the potential for safe access to be achieved at certain sites. Overall, **‘positive effects of limited or uncertain significance’** are predicted.

9.14 Water

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

Discussion

- 9.14.2 Perhaps a primary consideration is in respect of capacity at wastewater treatment works (WwTWs). There is often good potential to deliver capacity increases in support of growth; however, this can be costly and lead to delays, and there can be residual risk of capacity being breached leading to pollution of waterways, hence it is preferable to direct growth to locations with existing capacity. Matters were explored through a Water Cycle Study (WCS) for Hart, Rushmoor and Surrey Heath councils in 2017. The study explores housing growth under various scenarios that do not necessarily relate to the current Draft Local Plan; however, the study does highlight Chobham WwTW as having greater capacity to accept additional flows than is the case for the other two WwTWs in the Borough (Camberley and Lightwater).
- 9.14.3 Moving forward, there will be a need to confirm that the growth strategy for Camberley does not give rise to any issues in respect of WwTW capacity.
- 9.14.4 Aside from WwTW capacity, other issues relate to pollution to surface waters and groundwaters and supporting water efficiency / minimising pressure on potable water resources. These issues are typically a matter for development management, more so than spatial strategy and site selection, hence there is a need to closely consider:
- Policy **E6** (Flood Risk and Sustainable Drainage) – currently includes a focus on flood risk but might be expanded to reflect wider sustainable drainage objectives, including in respect of water quality.
 - Policy **DH4** (Sustainable Water Use) – all new homes are required to meet the water efficiency standard of 110 litres per person per day, to be achieved through compliance with the Building Regulations. As discussed in Section 6, there can be the potential to achieve higher standards.

- 9.14.5 There is also a notable focus on certain ‘water’ related matters within the site-specific policies for the two strategic sites in Camberley town centre. For example, Policy HA2 (London Road Block) requires *“appropriate rainwater management through SuDS integrated with landscape design to visually and environmentally enhance the public and private realm.”*

Conclusion

- 9.14.6 It is appropriate to flag ‘**negative effects of limited or uncertain significance**’ ahead of formal consultation with the statutory providers, including in respect of WwTW capacity at Camberley, and the Environment Agency may also wish to comment further on requirements in respect of SuDS, both site specific and borough-wide.

9.15 Conclusions on the Draft Local Plan

- 9.15.1 In conclusion, the appraisal predicts: **significant positive effects** in respect of housing objectives; **moderate or uncertain positive effects** in respect of accessibility, communities, ‘economy and employment’ and transport objectives; **neutral effects** in respect of air quality, climate change mitigation, historic environment, ‘land, soils and resources’ and landscape objectives; and **notable tensions / risk of negative effects** in terms of biodiversity, climate change adaptation and water objectives. Significant negative effects are not predicted under any of the topic headings.
- 9.15.2 Impacts and wider issues/opportunities discussed within this appraisal will be taken into account prior to plan finalisation. A number of specific recommendations are also made within Section 9 of the main report, which will be given consideration, including around the possibility of additional site specific policy.
- 9.15.3 It is also important to note that early drafts of this draft plan appraisal have been taken into account as part of the process of preparing the draft plan for consultation. As part of this, the appraisal above notes two instances of specific recommendations having been made as part of early appraisal iterations that have now been actioned (see paragraphs 9.3.2 and 9.4.7). There is no requirement for SA to be iterative in this way, but it is a means of demonstrating a robust and sound plan-making process.

Cumulative effects

- 9.15.4 The SEA Regulations, which underpin the SA process, indicate that stand-alone consideration should be given to ‘cumulative effects’, i.e. effects of the Local Plan in combination with other plans, programmes and projects that can be reasonably foreseen. In practice, this is an opportunity to discuss potential ‘larger than local’ effects. The following bullet points cover some key considerations:
- **Housing needs** – the proposed strategy involves unmet needs from Surrey Heath provided for within Hart District, and does not make any provision for the risk of unmet needs arising from elsewhere in the sub-region. However, this is an appropriate strategy because: A) the matter of unmet needs provision in Hart is agreed and set out in an adopted Local Plan, such that it does not need to be revisited at the current time; and B) the environmental constraints affecting Surrey Heath mean that the Borough is not suited to providing for unmet needs from Woking or elsewhere in Surrey, plus there is a need to recognise that Surrey Heath shares a housing market area with the North East Hampshire / Blackwater Valley authorities to the southwest (from where there is little or no risk of unmet needs arising). Work has been undertaken to appraise higher growth scenarios (Section 6), but only because of the need to explore the possibility of providing for locally arising affordable housing needs more fully and/or providing for a larger ‘supply buffer’ over-and-above the housing requirement. At the current time, on the basis of the discussion presented in Section 5, any scenario that would seek to reduce the unmet need figure and/or provide flexibility to reflect the risk of unmet needs arising from elsewhere, which would necessitate release of land from the Green Belt, is considered to be unreasonable.
 - **The economy** – the proposed strategy does not make provision for new employment land, beyond a mixed used strategic scheme within Camberley town centre, and does support the redevelopment of several employment sites for residential, primarily in the Camberley/Frimley urban area, and most notably Sir William Siemens Square. The primary ‘larger-than-local’ consideration is the need to support the economy of the Blackwater Valley, and regeneration of Camberley town centre is supported in this respect, as is the proposed protection for strategic employment sites. Transport modelling will need to feed-in, and the views of the Enterprise M3 LEP are sought through the current consultation.
 - **MOD operations** – this is a clear ‘larger-than-local’ consideration. The appraisal does not highlight any issues or risks, but the views of the MOD are sought through the current consultation.

- **Transport corridors** – the appraisal does not highlight any major growth-related issues or opportunities, but there will be a need to revisit matters subsequent to the current consultation, in light of modelling and responses received key stakeholder organisations including National Highways, Transport for the South East and both Surrey and Hampshire county councils. Key corridors include those road corridors that link Woking to the M3 and the M25, the M3 itself and the regionally important A331 corridor.
- **Thames Basin Heath SPA** – the matter of in-combination impacts to the SPA is a focus of a stand-alone Habitats Regulations Assessment (HRA), noting that eleven authorities manage the SPA in partnership. Key considerations include management of Horsell Common in collaboration with Woking Borough, and Chobham Common in collaboration with Runnymede District and RB Windsor and Maidenhead.
- **Landscape scale nature recovery** – there is a need to focus efforts on achieving conservation and ‘net gain’ objectives, in respect of biodiversity and wider natural capital and ecosystem services, at functional landscape scales, including landscape character areas and river corridors. A Local Nature Recovery Strategy (LNRS) will be forthcoming, under the Environment Act, but steps must be taken in the interim. Aside from matters relating to the TBHSPA and its associated heathland and former heathland landscapes, a primary consideration is potentially realisation of opportunities along the Blackwater Valley corridor in collaboration with Rushmoor Borough and Guildford Borough and other partner organisations. Views on constraints and growth-related opportunities are sought from biodiversity, nature-recovery and natural capital-focused organisations including Surrey Nature Partnership.

Figure 9.3: Surrey Heath within Surrey but linking closely to Berkshire and Hampshire

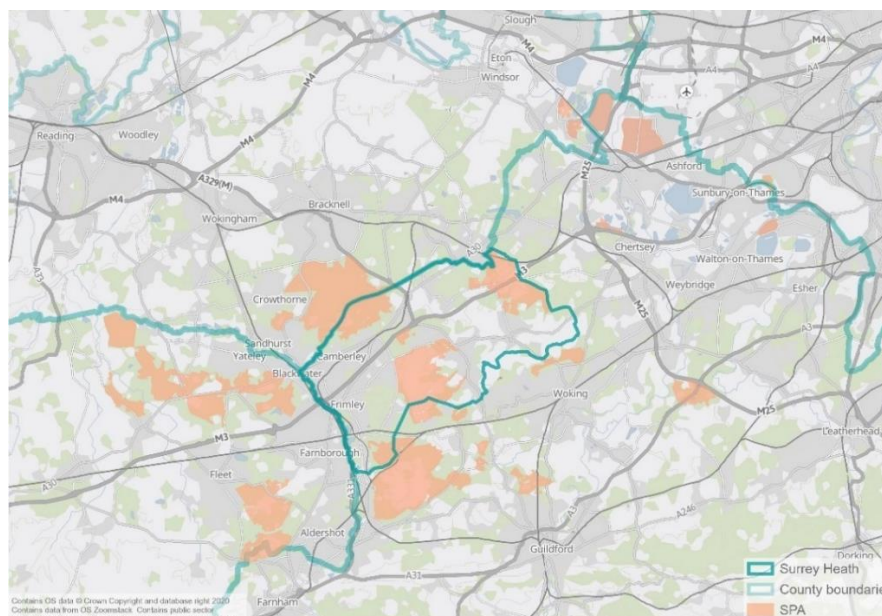


Figure 9.4: Camberley town centre – an important centre in the sub-region



Part 3: What are the next steps?

10 Plan finalisation

Publication of the Proposed Submission Local Plan

- 10.1.1 Subsequent to the current consultation it is the intention to prepare the proposed submission version of the Local Plan for publication in-line with Regulation 19 of the Local Planning Regulations 2012. This will be a version that the Council believes is 'sound' and intends to submit for Examination. Preparation of the Proposed Submission Local Plan will be informed by the findings of this Interim SA Report, responses to the current consultation, further evidence gathering and further appraisal work.
- 10.1.2 The SA Report will be published alongside the Proposed Submission Local Plan. It will provide all the information required by the SEA Regulations 2004.

Submission, examination and adoption

- 10.1.3 Once the period for representations on the Proposed Submission Local Plan / SA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed 'sound'. If this is the case, the plan will be submitted for Examination, alongside a summary of the main issues raised during the consultation. The Council will also submit the SA Report.
- 10.1.4 At Examination, the Inspector will consider representations (alongside the SA Report) before then either reporting back on soundness or identifying the need for modifications. If the Inspector identifies the need for modifications to the Local Plan, these will be prepared (alongside SA if necessary) and then subjected to consultation (with an SA Report Addendum published alongside if necessary).
- 10.1.5 Once found to be 'sound' the Local Plan will be adopted by the Council. At that time a 'Statement' must be published that sets out certain information including 'the measures decided concerning monitoring'.

11 Monitoring

- 11.1.1 At the current time, in-light of the appraisal findings presented in Part 2 (i.e. predicted effects and uncertainties), it is suggested that monitoring efforts might focus on:
- Agricultural land – it is possible to monitor loss of agricultural land by grade.
 - Air quality – the Council might review how air quality monitoring efforts are targeted in light of the Local Plan, including with a view to identifying problem areas outside of formally designated AQMAs, including potentially ecology-related.
 - Biodiversity – there will be a need to develop a framework for ensuring that individual developments deliver biodiversity net gain in combination at landscape scales.
 - Climate change adaptation –potentially monitor housing in close proximity to a fluvial flood zone (in addition to intersecting); also the 1 in 30 yr surface water flood zone.
 - Climate change mitigation – there is a need to carefully consider how Local Plan monitoring links to wider monitoring of borough-wide emissions. On a specific point, it could be appropriate to monitor the proportion of new homes linked to a heat network (e.g. district-level); also the proportion of homes delivered to standards of sustainable design and construction that exceed building regulations.
 - Employment land requirements – will require close monitoring, given that the current employment land evidence bases is now nearly two years old, and the regional and national economic context and baseline situation has evolved since that time.
 - Housing – the Council already monitors numerous housing delivery related matters through the Authority Monitoring Report, and indicators should be kept under review.
 - Transport – in Camberley town centre there will be merit to monitoring the travel behaviours of residents in detail, in order to test the hypothesis that per capita emissions from transport can be minimised at major growth locations.
 - Water – ongoing consideration should be given to any risk of capacity breaches at WwTWs and other risks to the status of water courses.

Appendix I: Regulatory requirements

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

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

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

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

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

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

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

Appendix II: The SA scope

Introduction

The aim here is to update the baseline review presented in Section 2 of the 2018 Interim SA Report, which is available at: surreyheath.gov.uk/residents/planning/planning-policy/draft-local-plan-2016-2032. The review is presented under the same series of headings as the equivalent review from 2018.

N.B. some of the information presented below has limited implications for the SA process given the scope of the emerging Local Plan and reasonable alternatives, but is included for completeness. Tailored discussion of the sustainability context and baseline is presented across the main body of this report.

Biodiversity

The Borough of Surrey Heath contains five Sites of Special Scientific Interest (SSSI), four of which are also internationally designated as Special Protection Area (SPA) and/or Special Area of Conservation (SAC) and one National Nature Reserve at Chobham Common, the largest in Southeast England, covering 574.3ha. There are also numerous locally designated sites such as Sites of Nature Conservation Importance (SNCI) and two Local Nature Reserves.

Specifically, the SPA/SAC has been designated for supporting heathland habitat which in turn supports three species of ground nesting birds, the Dartford Warbler, Woodlark and Nightjar. All three species are protected under the Birds Directive (2009/147/EC). The areas of heathland habitat are designated by the Habitats Directive (92/43/EEC, as amended) and the Birds Directive (2009/147/EC) and form part of the wider Thames Basin Heaths Special Protection Area (SPA) which includes elements of the Thursley, Ash, Pirbright and Chobham Common Special Area of Conservation (SAC). The whole of Surrey Heath lies within 5km of the Thames Basin Heaths SPA. Together SPA and SAC sites form the Natura 2000 Europe-wide network of nature protected areas.

Advice from Natural England is that development for net additional dwellings within 5km of the SPA is likely to lead to increased recreational pressure arising from increased population. The increase in recreational pressure is likely to lead to significant effects on the SPA and as such development should not be permitted without any form of avoidance measures. Furthermore, Natural England considers that there are no avoidance measures capable of accommodating net additional dwellings within 400m of the SPA due to urbanising impacts although other forms of development can be permitted. Consequently, a 400m buffer zone has been designated around the perimeter of the SPA, where no additional residential units will be permitted.

In order to accommodate residential development within a 5km zone around the SPA (but outside 400m) Natural England working with local authorities affected by the SPA has produced The Thames Basin Heaths Delivery Framework. The Framework sets out the mechanism to avoid adverse impact to the SPA. This includes the provision of Suitable Alternative Natural Greenspace (SANG) to act as land for general recreation to divert people away from the SPA. In addition to SANG, a Strategic Access Management & Monitoring (SAMM) project has been introduced which puts into place SPA wide monitoring and management.

Surrey Heath Borough Council adopted the Thames Basin Heaths SPA Avoidance Strategy Supplementary Planning Document in January 2012. This document provides general guidance on the Council's approach to avoidance of likely significant effect on the Thames Basin Heaths SPA arising from new development. Principally, it underpins the approach pursued by Surrey Heath in order to allocate SANG to residential development as well as the sustained implementation of a 400m buffer zone and collection of SAMM monies.

There is one SSSI, namely Basingstoke Canal that falls partly within Surrey Heath, but does not form part of the Thames Basin Heaths SPA (or Thursley, Ash, Pirbright & Chobham Common SAC). Figure A shows the locations of international and national ecological designations in Surrey Heath, including SAC, SPA, SSSIs and National Nature Reserves. Table A overleaf shows the summary percentage of SSSI units meeting area of favourable or unfavourable recovering condition. The trend is generally positive, with over 99% of 4 of the 5 sites meeting favourable or unfavourable recovering condition.

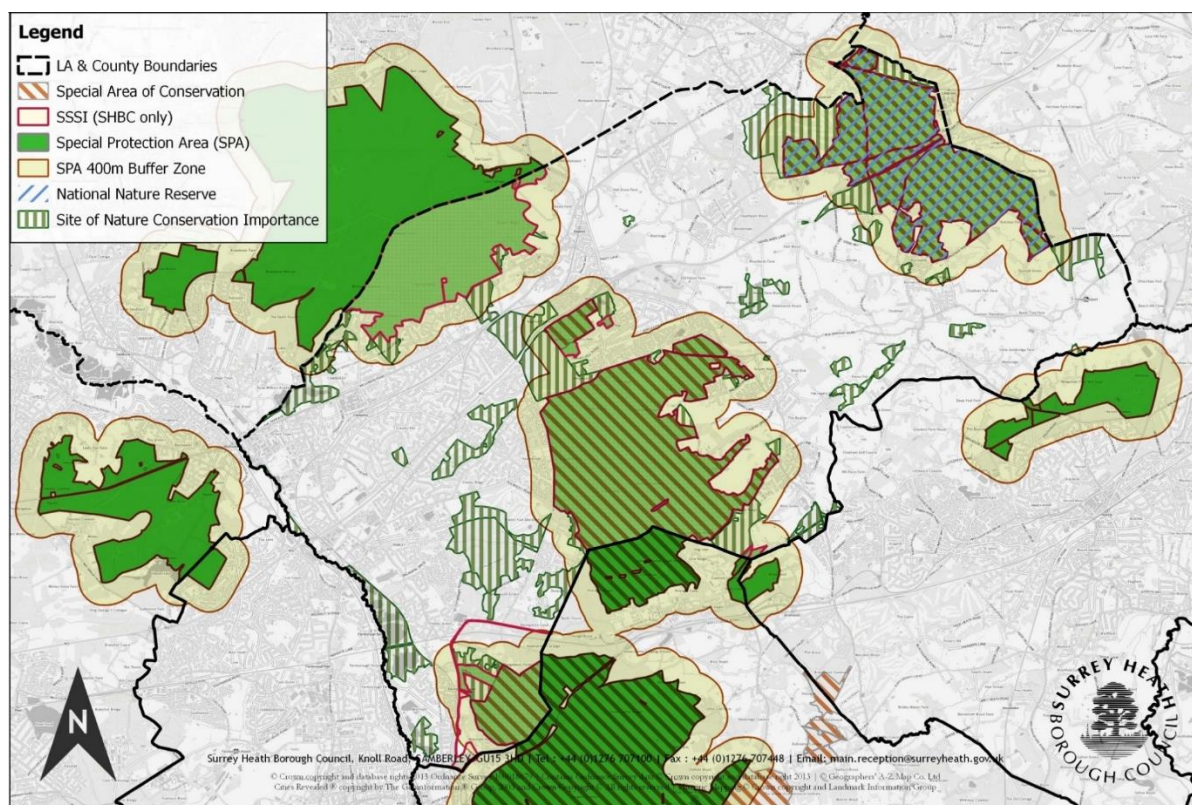
Table A. Condition status of SSSI summary units

SSSI	% meeting area of favourable or unfavourable recovering	
	Area	Percentage (%)
Broadmoor to Bagshot Woods & Heaths	1,687.05	99.45%
Colony Bog to Bagshot Heath	1,122.98	99.33%
Ash to Brookwood Heaths	1,561.04	99.03%
Chobham Common	655.73	100.00%
Basingstoke Canal	27.38	27.03%

Other protected species in Surrey Heath include badgers, dormice, great crested newts, natterjack toads and smooth snakes. Nationally and Internationally important species include: hobby, stonechat, sand lizard, marsh club-moss, swan-neck moss, marsh fern and *Oxyopes heterophtalamus* (a heathland spider). Green and blue infrastructure and waterbodies within the Borough provide opportunities to create coherent ecological networks.

The Borough also contains a number of locally designated sites such as Sites of Nature Conservation Importance (SNCIs). All 56 SNCIs in Surrey Heath were assessed in 2011/12 and it was determined that 51% (28 sites) were in favourable condition. This falls significantly short of the Borough target of 100%. However a trend cannot be identified at this time, as the condition of SNCIs in Surrey Heath had not previously been recorded. There are two further local designations, namely Brentmoor Heath and Bisley & West End Common Local Nature Reserves covering areas of 59ha and 55.5ha respectively.

Figure A: Biodiversity designations in Surrey Heath



Trends

The general trend is an improving condition for areas of biodiversity importance both at International and national level. A general improving trend is likely to continue into the future as better management regimes are implemented. The area of sites covered by international, national and local designations is not expected to change significantly.

The issue of an increasing population is likely to continue to place pressure on designated sites. Therefore the need to protect internationally designated sites and the securing of avoidance measures is an issue likely to continue into the future. Problems identified include only 27% of the Basingstoke Canal SSSI being in a favourable

or unfavourable/recovering condition. The Basingstoke Canal SSSI may improve over time with potential water recharge from the development at the Princess Royal Barracks but this is uncertain.

In terms of locally designated sites, the overall proportion of the Borough's 56 SNCIs in favourable condition is relatively low at 51% compared to the ambitious target to retain 100% in favourable condition. However it is recognised that the situation may have changed somewhat since 2011/12. In many cases, SNCIs are not in the Council's ownership and consequently, the extent and speed to which such habitats can be restored to a favourable condition relies largely on the actions of landowners. It is therefore uncertain how quickly their condition will improve and difficult to anticipate a future trend.

Key issues

Issue	Source	How might the Local Plan address this?
Persistent recreational pressure on SPA leading to deterioration and/or fragmentation of habitat including SSSI units.	Baseline Information Thames Basin Heaths Delivery Framework Natural England Commissioned Visitor Surveys of SPA	Policy should continue to ensure all net additional residential development will require SPA avoidance measures in the form of SANG and make contribution toward SAMM. The overarching approach to SANG & SAMM should be consistent with Natural England's Thames Basin Heaths Delivery Framework, the Borough's adopted Community Infrastructure Levy SPD and Thames Basin Heaths SPA Avoidance Strategy subject to any future amendments.
Condition Status of Basingstoke Canal SSSI units	Baseline Information from Natural England and the AMR	There is one SSSI unit that is not also SPA/SAC designated, namely, the Basingstoke Canal. The condition of the Basingstoke Canal is primarily a land management issue. The extent and speed to which such a habitat can be restored to a favourable position is uncertain and relies largely on Natural England working with landowners.
Condition status of SNCI uncertain	Baseline Information from Surrey Wildlife Trust surveys	The survey work last undertaken in 2011/12 proposed some minor amendments to site boundaries which have not yet been implemented. However no further surveys of the SNCIs have been undertaken since this date and it therefore may not accurately reflect the current situation. It would therefore be necessary to commission a future survey in order for the results to be accurate in informing future Local Plan policies.

Population

The baseline population of the Borough currently stands at 89,204.²⁷ (mid 2020 estimates), which is an 0.9% increase from 85,843 mid 2010. This is considerably lower than the percentage increase seen for England 2010 – 2020 (7.42%).²⁸

Based on 2011 Census data, the age structure of the Borough's population is set out in Table B overleaf. Compared to the South East and England, Surrey Heath has a slightly lower percentage of people aged under 30. The Borough has the same percentage of people aged over 65 as England at 16.7%, which is slightly lower than the figure of 17.1% for the South East of England. This is higher than the figure of 13% of people aged over 65 recorded in Surrey Heath in the Census 2001, which goes some way toward demonstrating that the Borough contains an ageing population. The mean age of the population in Surrey Heath is 40.2 which is slightly older than both the South East of England and England.

²⁷ ONS 2020 mid year population estimates

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesandnorthernireland>

²⁸ Ibid.

The Surrey Heath Place-Based Profile (2017) population projection predicts a small increase in the number of young children and those of working age.²⁹ The population aged 65 and over is projected to go up from 18,500 in 2017 to 22,800 in 2027. There are significant predicted increases in those aged over 85 years with numbers predicted to increase by more than 40% in the next 10 years, compared to around 30% for Surrey as a whole. The population aged 65 and over is projected to go up from 18,500 in 2017 to 22,800 in 2027.

In terms of ethnicity, Surrey in general is not as ethnically diverse as the rest of England. In Surrey Heath CCG, 9.3% of the population are from a non-white ethnic background.³⁰ There are an estimated 128 Gypsy, Roma, and travellers residing in 32 pitches across six traveller sites in Surrey Heath. This group has significantly poorer health than any other disadvantaged UK residents. Around 3% of the population are likely to be Nepalese who have higher rates of diabetes and coronary heart disease than the general population. This population tends to live around the Frimley area.

Table B: Age Breakdown of Population by Number and (%)³¹

Age Range	Surrey Heath	South East	England
Age 0 to 4	5,129 (6%)	534,235 (6.2%)	3,318,449 (6.3%)
Age 5 to 7	3,145 (3.7%)	299,327 (3.5%)	1,827,610 (3.4%)
Age 8 to 9	2,008 (2.3%)	188,731 (2.2%)	1,145,022 (2.2%)
Age 10 to 14	5,464 (6.3%)	512,875 (5.9%)	3,080,929 (5.8%)
Age 15	1,096 (1.3%)	106,916 (1.2%)	650,826 (1.2%)
Age 16 to 17	2,288 (2.7%)	217,612 (2.5%)	1,314,124 (2.5%)
Age 18 to 19	1,747 (2%)	217,156 (2.5%)	1,375,315 (2.6%)
Age 20 to 24	4,207 (4.9%)	534,287 (6.2%)	3,595,321 (6.8%)
Age 25 to 29	4,581 (5.3%)	528,057 (6.1%)	3,650,881 (6.9%)
Age 30 to 44	18,306 (21.3%)	1,761,278 (20.4%)	10,944,271 (20.6%)
Age 45 to 59	18,481 (21.5%)	1,716,857 (19.9%)	10,276,902 (19.4%)
Age 60 to 64	5,287 (6.1%)	535,399 (6.2%)	3,172,277 (6%)
Age 65 to 74	7,668 (8.9%)	763,695 (8.8%)	4,552,283 (8.6%)
Age 75 to 84	4,909 (5.7%)	501,118 (5.8%)	2,928,118 (5.5%)
Age 85 to 89	1,182 (1.4%)	139,576 (1.6%)	776,311 (1.5%)
Age 90 and Over	646 (0.7%)	77,631 (0.9%)	403,817 (0.8%)
Total	86,144	8,634,750	53,012,456
Mean Age (Years)	40.2	40	39.3

Indices of Multiple Deprivation (IMD) provide an indication of deprivation levels for a number of topic areas including health, employment etc. and give an overall score derived from these indicators. Combined IMD scores for 2015 showed that Surrey Heath was ranked 285 of 326 Local Authorities, which has fallen from 324 in 2010. There are pockets of relative deprivation in certain areas of the Borough such as Old Dean and York Town in Camberley, as illustrated in the Lower Super Output Areas' (LSOAs) IMD scores and rankings. Indeed, two LSOAs, one in Old Dean ward and one in St Michaels ward were ranked in the 30% most deprived areas nationally.

In the IMD 2019, Surrey Heath is ranked as 9th least deprived local authority (ranked at 309 of 317), which is an improvement since 2015, but is still more deprived than in 2010³². However, this masks pockets of much higher levels of relative deprivation across the Borough particularly but not solely, relating to the Education, Skills and Training indicator³³.

The figure below shows the IMD rankings for Surrey Heath in 2015. IMD 2019 can be seen [here](#).

²⁹ <https://www.surreyi.gov.uk/health-profiles/surrey-heath/#header-conclusion>.

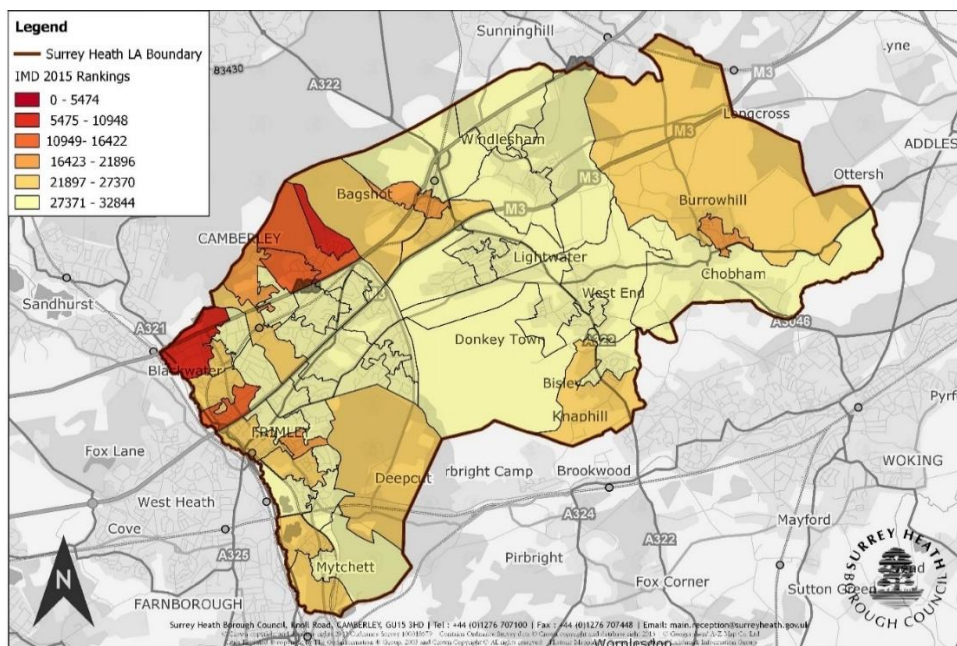
³⁰ Ibid.

³¹ Ibid.

³² Against average ranking.

³³ Available online at: www.gov.uk/government/statistics/english-indices-of-deprivation-2019.

Figure B. IMD Distribution for Lower Super Output Areas in Surrey Heath (2015 Rankings)



Trends

The positioning of Surrey Heath in the 2015 IMD has fallen 39 places below its rank in the 2010 IMD, but has since increased in its rank in 2019 (ranked at 309 of 317). This demonstrates an overall slight increase in deprivation, relative to the 325 other Local Authorities measured in England. However, since 2015, deprivation has improved considerably. It is considered that Surrey Heath will continue to be an area of low deprivation but with small pockets remaining, particularly in the largest settlement of Camberley.

The population profile of Surrey Heath is likely to remain relatively static but, along with national and local trends, continue an inclination toward an ageing profile, with more people over 65 and less under 30. Surrey Heath’s profile is ageing at a faster pace than the county wide rate. This is likely to be reflected in future age profiles.

An increasing population is likely to require additional housing and infrastructure, and place pressure on existing services and facilities. An ageing population may require bespoke services and housing needs and lead to new employment opportunities being filled by people from outside of the Borough, resulting in increased in-commuting and associated issues with congestion and transport infrastructure. This is unlikely to be off-set by a rise in the pensionable age.

Key issues

Issue	Source	How might the Local Plan address this?
Increasing population likely to require additional housing and related infrastructure	Baseline Information	The Objectively Assessed Housing Need will be assessed alongside other evidence to determine the Local Plan’s housing targets, but will need to ensure no significant effect on SPA.
Ageing population may require bespoke services and housing needs	Baseline information	Future policy should recognise the need for housing an ageing population and/or those with specialised needs.
Reduction in working age population and a consistent demand for industrial accommodation may result in increased in-commuting which is unlikely to be off-set by increase in pension age.	Baseline information	Policies should require preferred development locations to be situated near existing infrastructure
Enabling a high quality of life for all residents in the Borough, where the overall affluence can mask areas of deprivation. Notably LSOAs within Camberley are particularly deprived areas nationally.	Baseline information and IMD 2015-19	Policies should encourage a mix of uses and enable opportunities for community development and cohesion across the Borough. Necessary infrastructure to support development will also need to be delivered.

Human health

Overall Surrey Heath is an affluent area with good health outcomes and relatively low rates of many conditions and unhealthy behaviours. The average life expectancy at birth³⁴ for both men and women in Surrey Heath (82.2 and 84.8 years respectively) is similar to the Surrey average (81.8 and 85.0 years respectively). There is a considerable variation in both male and female life expectancy in different parts of Surrey Heath. years) can expect to live more than a full decade compared to those born in Old Dean (80.2 years).

The Surrey Heath Place Based profile 2017³⁵ published by Surrey County Council highlights that there is a difference of 9.2 years in LE at birth for men born in Windlesham (85 years) compared to those born in St. Pauls (75.8 years). There is a bigger difference in life expectancy for women compared to men. Women born in Mytchett and Deepcut (89.4 years) can expect to live more than a full decade compared to those born in Old Dean (80.2 years).

The Place Based profile (2017) highlights key issues relating to health as including; health inequalities, the growing population of those aged over 65, and in particular the increase in those aged over 85, access to services for those without a car and significant proportions of people estimated to have long term conditions who remain undiagnosed.

The overall health of residents has been measured in the Census 2011. Surrey Heath contains a relatively healthy resident population, with 86.8% of the Borough's residents in either good or very good health, compared to 83.6% and 81.4% of the population of the South East and England respectively. Furthermore, there are fewer residents in bad or very bad health in Surrey Heath at 3.2% compared to 4.4% in the South East and 5.4% in England.

The Place Based profile shows around 18.7 % (560) of children in reception year and 27.4 % (714) of children in year 6 in Surrey Heath are classified as overweight or obese. These percentages are lower compared with England (22.2% for reception and 33.4% for year 6) but similar to those for Surrey overall (2012/13-2014/15).

The Place Based Profile monitors indicators for 'Disease Prevalence: the major causes of illness and death', and finds that cardiovascular disease, cancer and respiratory disease are the top three contributing conditions to the life expectancy gap between the most and least deprived populations within Surrey. Long term conditions and their effective management is widely recognised to be one of the greatest challenges facing the NHS and Social Care. Long term conditions can affect many parts of a person's life, from their ability to work and have relationships to housing and education opportunities.

Health benefits can come from the provision of open space and leisure facilities. The Surrey Heath Open Space Study 2016 outlines the quantity of different types of open space provision in the Borough. One of the conclusions of the Study was the need to provide improved provision for young people and older people.

The Borough has a new leisure centre in Camberley which opened in 2021. A range of formal and informal open spaces and playing pitches exist across the Borough and there are two country parks in Frimley Green and Lightwater. The Borough also contains a number of new or improved areas of open space providing mitigation for the impact of new development on the Thames Basin Heaths Special Protection Area. Known as Suitable Alternative Natural Greenspaces (SANG), these include Chobham Water Meadows, St Catherine's SANG and Windlemere SANG.

There are several areas of Surrey Heath where people are deemed to have poor access to health services (particularly in the north and the south). This lack of access is particularly relevant in the rural areas. When commissioning services it might be necessary to consider how services are adapted to improve access for those who need them most.

Trends

It is considered that low levels of health deprivation will remain into the future and life expectancy will continue to follow an overall rising trend, mirroring trends nationally, albeit with the potential for some anomaly years to occur in either male or female life expectancy.

Increased life expectancy brings with it potential issues and problems of limiting long term illness which has implications for quality of life and available health services. This could be tempered by the Borough benefitting from open space and leisure provision, more of which may be implemented over time.

³⁴ Available online at: www.localhealth.org.uk/#bbox=479858.168432.26849.15897&c=indicator&i=t4.le_f_v&view=map10.

³⁵ Available online at: <https://www.surreyi.gov.uk/health-profiles/surrey-heath/#header-conclusion>.

Key issues

Issue	Source	How might the Local Plan address this?
Increased life expectancy increases pressure on health services	Baseline Information	Policy should encourage any large scale future development to be self-sustaining with suitable infrastructure delivery to cater for the increasing and ageing population of the Borough.

Economy & employment

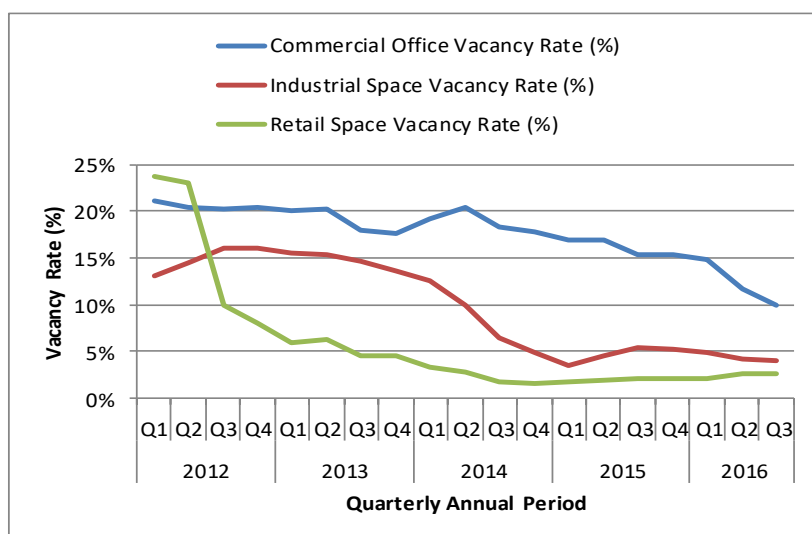
Surrey Heath has a diverse economic base, with businesses ranging from international organisations to small and medium sized local enterprises. The Borough contains businesses across a broad range of sectors including: Merrill Lynch, Frazer Nash (Chobham), Novartis, and Unisys. Frimley Park Hospital, which is rated 'outstanding', is the Borough's largest employer. The Sandhurst Royal Military Academy is also partly located within the Borough.

The majority of employment floorspace is located in Camberley and Frimley at three large business parks and five industrial estates that make a significant contribution to the employment land supply. There are also four single occupancy sites housing major businesses; one located in Frimley, one near Mytchett, and two near the rural settlement of Windlesham. Fair Oaks Airport in Chobham provides employment use within the local area.

Recent figures show that despite Covid-19 the local economy is relatively stable, with comparatively low levels of unemployment and high rates of business formation, particularly small businesses. The Borough's traditional manufacturing industries have largely been replaced since the mid-1990s by information and technology based industries that benefit from strong linkages to the Thames Valley. These include the businesses in Watchmoor Business Park, which forms part of a larger business cluster based in and around the Blackwater Valley towns. However, compared to most other towns within the EM3 LEP Camberley has relatively high industrial floorspace .

There has been a slight decline in office floorspace in the last 15 years. Data from CoStar UK Ltd (November 2016) recorded that the Borough had an office vacancy rate of 9.8% recorded in November 2016, as demonstrated in Figure C. This has fallen considerably over the past 5 years. The Borough's industrial vacancy rate is 4.1% (November 2016) and has also reduced considerably over a 5 year period. The office and industrial vacancy rates recorded for the South East of England are 7.8% and 3.8% respectively (November 2016), demonstrating that Surrey Heath has slightly higher vacancy rates than the regional averages. However, Surrey Heath's vacancy rates have reduced more rapidly than the regional averages, over the past 5 years, and overall there has been an increase across the Functional Economic Area of Hart, Rushmoor and Surrey Heath. Losses include the conversion of offices to residential uses through permitted development rights.

Figure C. Office, Industrial & Retail Vacancy Rates in Surrey Heath from 2012-2016



Trends

It is considered that low levels of both income and employment deprivation will continue into the future given the relative buoyancy of the local economy, access to larger employment centres such as London and Reading, and low unemployment in comparison with the national picture.

Surrey Heath has a diverse economic base which is likely to continue, with office vacancy rates in Surrey Heath falling in the past few years. Although overall there has been an increase across the Functional Economic Area of Hart, Rushmoor and Surrey Heath, for example Camberley has a significant level of industrial floorspace which is likely to continue.

Key issues

Issue	Source	How might the Local Plan address this?
Borough office vacancy rates	Baseline Information Employment Land Review 2015	Future Policy should seek to protect Core Employment Areas / Strategic Employment Sites. However, where employment sites no longer meet the requirements of their occupiers, have high vacancy rates or have been eroded by other non-employment uses, boundary changes may be required and in some cases the sites will not be allocated.
Maintain low level of vacancies in District and Local Centres, with a balance of uses	Baseline information	It is important that policy continues to protect District and Local centres. An updated Retail Study should review primary and secondary frontages and local shopping parades and modify where necessary to ensure continued viability of centres.

Transport

Government Policy recognises the need to reduce congestion on the highway network and to encourage other, more sustainable forms of transport including walking and cycling. Table C shows the key mode of transport within the Borough is the private car which is used for 70% of Surrey Heath resident's travel to work patterns. Meanwhile, public transport, including walking and cycling contribute to 17% of travel to work patterns³⁶. The percentage of Surrey Heath residents using a car or van to travel to work is considerably higher than both the South East and England averages. Bus patronage, cycling and walking are lower than the South East and England averages.

A higher than average proportion of residents in Surrey Heath work from home and the proportion of residents commuting by train is higher than the England average but lower than the South East. Consequently, car ownership in Surrey Heath is high with 90% of households owning at least 1 car or van. This is higher than the South East and England averages of 81% and 74% respectively.

Table C. Census 2011 - Travel to Work Patterns (% of population aged 16-74 excluding non-working)

Method of Travel to Work (Resident Population)	Surrey Heath	South East	England
Work mainly at or from home	8%	7%	5%
Underground, metro, light rail or tram	0%	0%	4%
Train	6%	7%	5%
Bus, minibus or coach	2%	4%	7%
Taxi or minicab	0%	0%	1%
Driving a car or van	70%	61%	57%
Passenger in a car or van	4%	5%	5%
Motorcycle, scooter or moped	1%	1%	1%
Bicycle	2%	3%	3%
On foot	7%	11%	11%

³⁶ Census 2011

The Borough is well connected by road to a number of strategic transport routes linking to London and the south coast. The M3 motorway stretching from London to Southampton crosses through the Borough from east to west and abuts the settlements of Camberley, Frimley, Bagshot and Lightwater. Other major highways which run through the Borough include the A331 Blackwater Relief Road which runs north to south along the western boundary and the A322 which connects junction 3 of the M3 with the towns of Bracknell to the North and Guildford to the South. The A30 runs east to west through the Borough and connects the Blackwater Valley with London and the South West of England. The Local Highway Network in Surrey Heath suffers congestion in certain areas, especially at peak times. The Draft Surrey Heath Local Transport Strategy identifies particular areas where congestion arises. The A322 and A331 Blackwater Valley Relief Road approaches to M3 Junctions 3 and 4 respectively are areas of significant peak time congestion. The A30 corridor suffers peak time congestion from Bagshot in the east to the Surrey / Hampshire border west of Camberley.

Based on the 2011 Census, Surrey Heath has one of the highest rates of car ownership in England and Wales with 90% of households owning a car or van, higher than the rest of Surrey. High levels of car ownership reflect the prosperity of the area, but also the historically poor public transport facilities. Vehicle emissions account for a large proportion of local air pollution within the Borough. The Department of Food and Rural Affairs (DEFRA) has identified one Air Quality Management Area (AQMA) in Surrey Heath known as the Camberley AQMA which runs parallel to the M3 from Junction 4 at Frimley up to the A325 Portsmouth Road at the Ravenswood roundabout in Camberley.

There are three rail stations situated within the Borough at Bagshot, Camberley and Frimley, all of which are served by a branch rail line between Ascot and Guildford. Aside from a few very early morning services there are no direct rail links to London with commuters required to change at Ascot. Many commuters living in Surrey Heath therefore use nearby faster services from stations outside the Borough at Farnborough, Woking and Sunningdale.

Camberley is however served by good bus links to the wider Blackwater Valley with the Number 1 bus service running frequent and regular services between Old Dean and Aldershot. A bus lane is situated just west of the town centre on the A30 which runs in an east to west direction towards the Meadows Gyrotory. This has improved bus journey times. Bus links in the east of the Borough are not served by such frequent or regular services.

Improvements to the off road pedestrian and cycle provision along the Basingstoke Canal tow path including the section between Deepcut and Brookwood can help alleviate car use for short and medium length journeys.

Trends

The high level of dependence on the private car is expected to continue into the future. This is likely to be exacerbated by the ongoing lack of a direct rail link to London and much of the wider Blackwater Valley Area. As a result, it is anticipated there will be an increase in the number of car journeys on both the local and strategic road networks in peak hours overall. Despite this anticipated increase in traffic, there should be a proportionate increase in capacity due to highways improvements projects at both a strategic and local level. The potential of increased congestion should therefore be mitigated accordingly.

Key issues

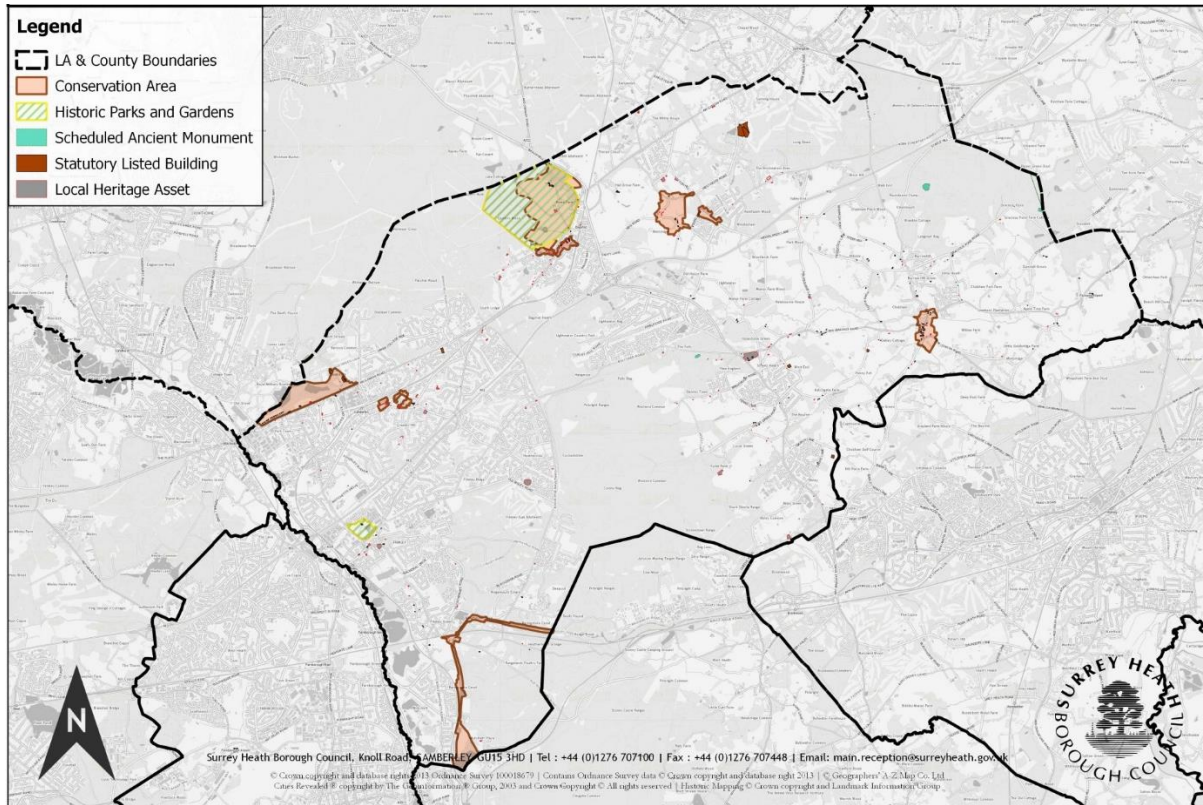
Issue	Source	How might the Local Plan address this?
Increased congestion on roads in and around the Borough particularly during peak hours as a result of the motor car being the most commonly used form of transport for commuters.	Baseline Information Evidence base	Policy should support improved public transport in the Borough, as well as the integration of pedestrian and cycle routes in future development. Additionally, policy should encourage new development in sustainable locations which will assist in reducing then need to travel or have accessibility to sustainable modes of transport.
Continued lack of direct rail links to London	Baseline information	Policies should encourage joint working with partners such as Network Rail in order to achieve improved rail services. Furthermore, development can be encouraged in sustainable locations within proximity of train stations thus creating higher demand for direct rail services to London.
Eastern areas of the Borough are not served by regular or frequent bus services.		Future policy should support and encourage proposals that will improve Surrey Heath's public transport network, particularly in the east of the Borough. This should include joint working with Surrey County Council and local bus operators.

Cultural heritage

As shown within Figure D, there are 181 statutory Listed Buildings or structures in Surrey Heath comprising 1 no. Grade I, 5 no. Grade II* and 175 no. Grade II Listed Buildings. There are 203 locally Listed Buildings and structures and 14 areas of High Archaeological Potential.

The Borough also contains 4 Scheduled Monuments and 2 Historic Parks and Gardens. There are 9 Conservation Areas; 3 in Bagshot, 2 in Camberley, 1 in Chobham, 2 in Windlesham and the Basingstoke Canal which enters Surrey Heath from Ash Vale in Guildford Borough, runs from Mytchett through to Deepcut and back into Guildford Borough at Pirbright.

Figure D. Cultural heritage designations in Surrey Heath



Trends

There is unlikely to be a significant change in the current situation, although the Borough Council will designate additional Locally Listed Buildings in the future if they are considered of architectural or historical merit.

There are currently no structures in Surrey Heath that feature on the Heritage at Risk register nor have any local issues with cultural heritage been identified. The buildings and structures as already listed will require continued protection and this may be an issue when considering future development as well as the setting of Listed Buildings and Conservation Areas (whether statutory or local).

Key issues

Issue	Source	How might the Local Plan address this?
Development could affect Conservation Areas, Listed Buildings & structures.	Baseline Information Evidence base	Policy should provide continued protection and enhancement of the historic environment.
Development could affect the setting of Conservation Areas, Listed Buildings & structures.	Baseline information	Policy should ensure full consideration of the setting of the historic environment in future development.

Material assets

Although there is no set definition of what constitutes material assets, this section will focus on housing, infrastructure and minerals.

The Local Housing Needs Assessment, 2020 identifies growth of approximately 13.7% in total population over the period to 2040 and an increase in total households of 19%. The greatest proportional growth is expected in older persons with numbers of households headed by someone over 85 forecast to increase by 104%. Households in some working age groups (40-59) are forecast to see negative growth .

Surrey Heath is an expensive place to live with house prices and rental costs higher than the South East and national averages, although lower than the averages for Surrey. Affordability in Surrey Heath deteriorated by 89.9% between 2002 and 2018, a higher rate than for England and Surrey.

There is a greater than average supply of 3 bed houses in the Borough and also a higher proportion of 4+ bedroom houses in owner occupation (44%) and the private rented sector (17%) compared to the County and England. There are a significantly lower proportion of 1 bed dwellings in the private rented sector (18%) compared to Surrey (24%) and England (33%).

A large proportion of Surrey Heath residents live in 2 person households, which comprise 36% of all households. According to the ONS Neighbourhood Statistics demonstrated in Table D below, the number of households who own their property in the Borough is 77% with the remainder split 10% social rent, 12% private rent and 1% shared ownership. There is a higher percentage of households owned outright or with a mortgage or loan in Surrey Heath than the South East and England averages. There are lower levels of privately rented households, an equal number of social rented (other) and much lower social (rented from Council) households than the South East and England averages. The Council has sold the majority of its housing stock to registered social landlords and other social housing providers which explains the very low proportion of social (rented from Council) households.

Table D. Households by tenure

Tenure	Surrey Heath	South East	England
Owned; Owned Outright	35%	33%	31%
Owned; Owned with a Mortgage or Loan	42%	35%	33%
Shared Ownership (Part Owned and Part Rented)	1%	1%	1%
Social Rented; Rented from Council (Local Authority)	1%	6%	9%
Social Rented; Other	8%	8%	8%
Private Rented; Private Landlord or Letting Agency	10%	15%	15%
Private Rented; Other	2%	2%	1%

As of January 2020, there were 2 public sites (29 pitches); 2 unauthorised sites (7 pitches); and 1 Travelling Showpeople yard with permanent planning permission (6 plots).³⁷

The Borough is served by a number of infrastructure services/facilities which also serve the wider area. Major Infrastructure includes the M3 Motorway and A331 Blackwater Valley Relief Road Primary Route; Camberley, Lightwater and Chobham sewerage treatment works; Frimley Park Hospital; Bagshot, Camberley and Frimley Rail Stations; Four state secondary schools and 25 state infant/junior/primary schools³⁸ and two leisure centres, one in Camberley the other in Lightwater. There is an additional sports centre in Frimley which is open to the public at evenings and weekends.

³⁷ See <https://www.surreyheath.gov.uk/sites/default/files/GTAA%20-%20%28Gypsy%20and%20Traveller%20Accommodation%20Assessment%29%20Final%20Report%202020.pdf>

³⁸ Surrey Heath Primary Schools 2016/17, SCC https://www.surreycc.gov.uk/data/assets/pdf_file/0003/66108/Information-on-Primary-Schools-2016-Surrey-Heath-V5.pdf

There are no identified capacity issues with respect to gas, electricity or water supply although some reinforcing may be required as part of the Princess Royal Barracks development in Deepcut. No specific capacity issues have been identified with waste water drainage.

The Surrey Minerals Plan: Core Strategy 2011 (SCC) does not highlight any areas of the Borough as safeguarded for mineral workings.

Green infrastructure and waterways play a role as part of the valued landscape of Surrey Heath.

Trends

Given increasing population levels it is considered that the need and demand for housing will continue into the future. The main type of occupation will continue to be owned rather than rented. The proportion of two person households in the Borough may reduce in the future with one person households increasing.

A growing population is likely to increase pressures on existing services/facilities, although this is not expected to be at a level which would be significantly detrimental.

Key issues

Issue	Source	How might the Local Plan address this?
Increasing population increases demand for affordable units	Baseline Information	Future policy should set guidelines for the % of affordable housing required, dependent on number of units provided. Policy should regard shared-ownership accommodation as a further element in achieving a greater mix of tenures and providing a wider range of affordability in housing. A range of dwelling sizes and types should be encouraged..
Additional pressures on existing infrastructure services/facilities	Baseline information	Policy should ensure projects are delivered in accordance with an updated Infrastructure Delivery Plan. Contributions will continue to be collected through CIL as specified in the CIL Charging Schedule and prioritised according to the Reg123 List.

Landscape

Natural England has undertaken a National Character Areas (NCA) study (formerly known as joint character areas) which categorise areas in England with similar landscape characteristics by region.

The Borough of Surrey Heath falls into an NCA defined as 'Thames Basin Heaths' which is characterised by: -

- Particularly diverse landscape unified by the high incidence of heathland and coniferous forestry;
- Heavily populated and developed area characterised by large towns plus numerous smaller settlements along transport corridors interspersed by open land;
- Fragmented but often connected blocks of largely neglected remnant heathland as a result of early agricultural clearances and widespread development;
- The western part of the area is fairly well-wooded with grazed pasture but retains a heathy character due to the dominance of oak/birch/bracken/pine and remnant heath on small unimproved pockets of land;
- Variety and contrast is given by the wide grazed floodplain, drainage ditches, restored gravel workings and lush wetland vegetation;
- Large tracts of coniferous plantations or mixed wood with beech and birch are typical of much of the area, with significant areas of ancient woodland in the west.

The west of the Borough is generally urban in character with the settlements of Camberley, Frimley, Frimley Green and Mytchett sitting alongside the A331 Blackwater Valley Relief Road, bisected by the M3 motorway. This urban character continues on the western side of the Blackwater Valley Relief Road with the conurbation of Farnborough and Aldershot in Rushmoor Borough and to the northwest of Camberley at College Town, Owlsmoor and Sandhurst in Bracknell Forest Borough. However, dispersed within the urban areas are pockets of open green space which serve general recreational needs. The general topography is one of gradual inclines away from the Blackwater

Valley towards the north and east leading to areas of Heathland. The Blackwater Valley landscape has been altered by the legacy of sand and gravel extraction.

The centre of the Borough is characterised by sharper inclines sloping eastward and leading to elevated ridge landscapes on plateau gravels known as the Chobham Ridges. This area is covered by tracts of heathland with some mixed deciduous and/or conifer woodland. The central area is separated from a similar landscape at Chobham Common and Ribs Down to the east by the river valleys of the Windlebrook/Halebourne/Millbourne and The Bourne.

From the central area the landscape slopes down towards the east, encompassing the river valleys of the Windlebrook/Halebourne/Millbourne and The Bourne. It is characterised by open pasture and low lying meadows forming areas of floodplain. The eastern area is predominated by open countryside, much of which is designated as Green Belt but includes the rural settlements of Bisley, Chobham, West End and Windlesham.

The townscape of the main settlements in the west varies from Edwardian terraces, post war housing, private estates built in the 1970's and 1980's as well as more sylvan areas predominated by larger dwellings set in large plots. As such there is no one distinct architectural or townscape style. The eastern settlements are characterised as rural villages with a mix of house types and architectural styles with the centre of Chobham retaining its historic core.

Trends

It is considered that many of the landscape/townscape features associated with the Borough will remain largely unchanged in the future. However, the allocation of the Princess Royal Barracks in Deepcut for residential led development will change the landscape in this area, although this should be seen in the context of existing development at the site and potential for development to 'bed-in' over time.

Key issues

Issue	Source	How might the Local Plan address this?
Protection of most valued landscapes and townscapes	Baseline Information	Policy should seek to protect landscape/townscape character, particularly in the most valuable locations, which should already have additional protection such as Conservation Area Status. Development should be sympathetic to its surroundings and of high quality design and layout.

Climate

In 2019, the Borough Council declared a Climate Change Emergency setting out the intention to become carbon neutral across its own estate and operations by 2030. Like the rest of the UK the likely implications of climate change in the Borough will include higher average temperatures, particularly in summer and winter, changes in seasonal rainfall patterns, along with more intense periods of rainfall and the likelihood of more very hot days and heatwaves.

The Surrey Heath Climate Change Study, (AECOM, 2020) showed that the total carbon emissions for the Borough in 2017 was 417,346 tCO₂e. The greatest contributor to this was domestic energy use, accounting for 41% of emissions, with road transport the next greatest contributor (33%). Whilst overall emissions have dropped considerably since 2005, the Borough has a higher than UK average level of carbon emissions per square km.

The Thames Catchment Flood Management Plan (CFMP)³⁹ identifies the urban west of the Borough as lying in a zone of 'expanding towns in floodplain locations' with sources of flooding identified as a combination of river, surface water and sewer systems. The east is defined as Towns and Villages in Open Floodplain (north & west). The CFMP also highlights up to 250-500 properties at risk of flooding in a 1% annual probability river flood.

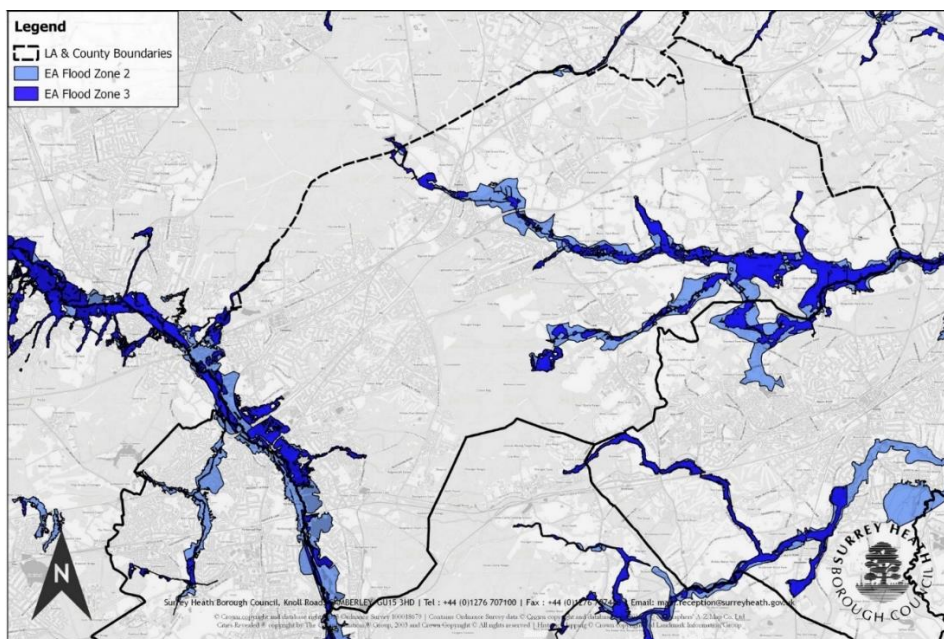
Working with Local Planning Authorities, the plan aims to avoid any increase in flood risk from future urban expansion, including in the Blackwater Valley. The CFMP Policy for the sub-area is to continue to manage risks effectively but further action may be required to keep pace with climate change. In the east, the policy is to take further action to reduce the risks of flooding where possible with proposed actions identified as maintaining capacity of rivers to reduce flood events and retain remaining floodplain.

³⁹ Thames Catchment Flood Management Plan: Summary (2009) Environment Agency. Available at: <http://publications.environment-agency.gov.uk/pdf/GETH1209BOYL-e-e.pdf>

The Borough Council’s Strategic Flood Risk Assessment (SFRA), 2015⁴⁰ assessed which areas of the Borough, were liable to flooding from fluvial (river) Sources (with climate change considered). In the west this is mainly along the Blackwater river corridor and in the east from the Windlebrook/Halebourne/Millbourne and The Bourne. Figure E overleaf displays areas of the Borough at risk of fluvial flooding as identified by the Environment Agency (EA) Flood Zones.

Even where areas of the Borough are not affected by fluvial flood risk, they may fall within areas at risk from other sources of flooding such as run-off, sewer or groundwater inundation as indicated within the SFRA. The Basingstoke Canal to the south of the Borough is an artificial source of flooding. The SFRA highlights residual flood risk from the Basingstoke Canal at Frimley Lodge Park near Mytchett and along the Deepcut flights.

Figure E. Flood risk in Surrey Heath



Trends

Despite the onset of climate change it is unlikely that fluvial flood risks will increase significantly. Regard will be given to updated climate change guidance. Given the potential for more intense rainfall events as a consequence of climate change, coupled with the amount of existing hard landscaping in and around the urban areas of the Borough, the issue of flooding from other sources arises. Intense rainfall events must be considered against the updated climate change allowance to consider whether there would be an increase in fluvial flooding.

Whilst it could be considered that carbon dioxide emissions will continue to rise in the future given the reliance on travelling by car and the need for additional dwellings, there is the potential for technological advances including clean energy and increased levels of sustainability in buildings. Furthermore, an increased general awareness of the harm to the environment that emissions can cause, initiatives to reduce emissions and increasingly economical private motor vehicles could help stabilise or even reduce emissions. However, the estimates for temperature increases and rainfall are unlikely to change significantly. Applicants would need to submit a Flood Risk Assessment with applications for major development in Flood Zone 1 to take account of surface water drainage.

Key issues

Issue	Source	How might the Local Plan address this?
Intense rainfall events may give rise to non-fluvial flooding.	Baseline Information Strategic Flood Risk Assessment	Future policy should ensure Flood Risk Assessments (FRA) are required for all planning applications in flood zones 2 and 3 as well as areas of potential surface water flooding as identified in the updated SFRA (2015).

⁴⁰ Strategic Flood Risk Assessment: Volume 2 Technical Report (2015) Capita. Available at: http://www.surreyheath.gov.uk/sites/default/files/documents/residents/planning/planning-policy/LocalPlan/EvidenceBase/SH_SFRA_Vol2_TechRep102015v2.pdf

Issue	Source	How might the Local Plan address this?
		In cases where specific flood risk assessments identify a risk, policy should require measures to be put in place in order to minimise this to a sufficient standard, which will be determined. In addition, all development proposals should demonstrate how they will incorporate SuDS in the scheme to mitigate surface water run-off.
Continual reduction of carbon dioxide emissions is essential in order to assist in meeting the national target	Baseline Information	A combination of policies should contribute to the overall reduction of greenhouse gasses, particularly CO ₂ . This will include the promotion of sustainable development locations and sustainable modes of transport. Policies should require design guidance that facilitates renewable and low carbon development.

Soils

The main geological deposit in the Borough is sand under laid by Reading and Bagshot beds with alluvial deposits within the river corridors. Extensive mineral extractions have taken place in the west of the Borough (gravel) which has been subject to restoration. The acidic soils in the central area of the Borough support a predominantly heathland habitat.

Agricultural land makes up 26% in Surrey Heath. The agricultural land classification identifies the best and most versatile (BMV) agricultural land as classes 1, 2 or 3a. Surrey Heath does not have any class 1 or 2 BMV and only 10% of agricultural land is classified as BMV 3.

There are no sites within Surrey Heath identified as contaminated, but there are 49 potentially contaminated sites which would require further investigations if development consents were sought. This excludes land owned by the Ministry of Defence (MOD) which is under the jurisdiction of the Environment Agency.

The percentage of dwellings permitted in Surrey Heath on previously developed land from 2012-2016 was 81.2%.

Trends

In future, it is likely that some non-PDL sites may come forward, as well as sites on previously developed land. If even a limited number of sites in rural locations were allocated through the Local Plan, this would reduce the overall percentage of dwellings built on PDL. However it is unlikely that it would be a significant reduction. Due to the nature of the Borough's land availability constraints, it is likely that the majority of development would still be built on PDL. Soil quality is likely to remain relatively stable in the future and opportunities may present themselves to remediate land if contamination is present.

Key issues

Issue	Source	How might the Local Plan address this?
New dwellings within countryside locations would lower the percentage of dwellings built on PDL and potentially reduce soil quality.	Baseline Information	Policy should encourage PDL sites to be considered in the first instance provided that they meet other sustainability criteria. However, where PDL sites cannot meet housing requirements alone, it will be necessary to consider other options.

Air

Mortality attributable to particulate air pollution in Surrey Heath is similar to that for England and Surrey overall. Around 4.6% of all deaths in Surrey Heath among people over 30 years of age are due to human-made air pollution.⁴¹ Partners across Surrey Heath could begin to work to lower air pollution and its effects through development of sustainability strategy and evidence based projects such as air alerts and travel initiatives such as increasing active travel and car-pooling.

Vehicle emissions are now the principle source of air pollution in the UK given the decline of using coal for domestic heating or in coal-fired power stations. Emissions from vehicles can include carbon monoxide, carbon dioxide,

⁴¹ <https://www.surreyi.gov.uk/health-profiles/surrey-heath/#header-air-quality>

oxides of nitrogen, volatile organic compounds (VOC) and particulate matter (PM₁₀). These pollutants can have a detrimental effect on human health and the natural and built environment.

The main air quality issues within Surrey Heath are associated with the emission of pollutants from road traffic, in particular the M3 motorway.⁴² The main pollutant of concern is nitrogen dioxide (NO₂). Over previous years the concentrations of NO₂ measured along the M3 corridor, between the Frimley flyover and just north of the Ravenswood roundabout (A325), led to the conclusion that exceedances of the annual mean objective for NO₂ were likely in this area and in 2002 an Air Quality Management Area (AQMA) was declared (see Figure F). The following year a more detailed assessment concluded that the AQMA should be extended in both directions along the M36. Since then SHBC has continued monitoring within the borough and the AQMA has been retained.

Figure F. Approximate boundary of Camberley AQMA



With the exception of road traffic, there are no significant sources of local emissions in the borough.⁴³

Following the declaration of the AQMA in 2002, an Air Quality Action Plan (AQAP) was required. The AQAP was adopted in 2005 and set out the measures SHBC intended to implement to address air quality issues in the borough and to meet the air quality objectives.⁴⁴ Also included in the AQAP were considerations and options for Highways England (formerly the Highways Agency) to consider. It is acknowledged that the existing AQAP is a number of years old and an updated action plan may be required should the AQMAs be retained in future years.

In the 2007 Action Plan Progress Report it was highlighted that 46 of the 51 proposed actions had been completed, including 25 that were completed on time. In 2014, Highways England commenced work on upgrading the M3 Motorway between junctions 2 and 4 to a Smart Motorway. The upgrade was completed during 2017 and was anticipated to improve air quality at locations near to the M3, and it appears this has proven to be the case.

As per the most recent Air Quality Status Report (ASR, 2021)⁴⁵ overall, the NO₂ monitoring results indicate a decrease in annual mean NO₂ concentrations across the borough in comparison to the previous year with only one site experiencing a slight increase.

It is considered that the AQMA for PM₁₀ will be revoked in the near future as there have been no exceedances at relevant exposure locations for over 5 years. However, due to continuing elevated annual mean NO₂ concentrations in the previous 3 years it is considered prudent to retain the existing AQMA for NO₂. T

NO₂ can have adverse effects on natural habitats which are dependent on low levels of nutrients such as the lowland heathland covered by the Thames Basin Heaths SPA and Thursley, Ash, Pirbright and Chobham Common SAC. The Department of Transport's Transport Analysis Guidance (TAG) Environmental Impact Appraisal⁴⁶ states that beyond 200m the contribution of vehicle emissions from the roadside to local pollution levels is not significant. The majority of highways within Surrey Heath do not lie within 200m of the SPA/SAC, but several do.

Trends

The main source of NO₂ produced within the borough is from road traffic exhausts, but these sources, being the motorway and major trunk roads, are ones over which the Council has little control. While the M3 Smart Motorway

⁴² https://www.surreyheath.gov.uk/sites/default/files/documents/residents/environmental-health/ASR2021_final.pdf

⁴³ https://www.surreyheath.gov.uk/sites/default/files/documents/residents/environmental-health/ASR2021_final.pdf

⁴⁴ https://uk-air.defra.gov.uk/assets/documents/no2ten/Local_zone31_SurreyHeath_AQActionplan_1.pdf

⁴⁵ https://www.surreyheath.gov.uk/sites/default/files/documents/residents/environmental-health/ASR2021_final.pdf

⁴⁶ TAG Environmental Impact Appraisal (2014). Available at: www.gov.uk/government/publications/webtag-tag-unit-a3-environmental-impact-appraisal-november-2014

Scheme has improved air quality at locations near to the M3, additional traffic generated from the extra capacity could negatively impact the Camberley AQMA. However, this will be mitigated over time as increasingly cleaner vehicles with lower emissions come into wider use. For example, SHBC recently commenced an initiative partnering with an energy supplier to install Electric Vehicle (EV) charging points in public places.

In addition, infrastructure schemes such as the M3 Smart Motorway will help minimise congestion, which in turn will reduce pollutants and improve air quality. Given the likelihood of technological advances and the replacement of older vehicles with new, that air quality issues arising from vehicle traffic will be likely to improve overall.

Key issues

Issue	Source	How might the Local Plan address this?
Future development and highways projects could generate additional traffic related emissions close to SPA/SAC	Baseline Information	Policy will need to consider impact of traffic generation on roads located within 200m of the SPA/SAC.
continuing elevated annual mean NO ₂ concentrations in Camberley AQMA	Baseline Information SHBC 2021 Air Quality Annual Status Report	The level of traffic in the AQMA is generated by the M3 motorway. This is managed by Highways England and much of the traffic is simply passing through the Borough. However, the Borough Council can assist in reducing overall traffic flows by working with Surrey County Council to encourage other methods of transport. This will help to avoid exacerbating the issue with increased localised journeys on the motorway.

Water

The Thames River Basin Management Plan produced by the Environment Agency divides the Thames catchment into units, one of which is unit R9, the river Blackwater which covers the west of the Borough. Ecological quality of the Blackwater is currently considered 'moderate' with the aim of reaching 'good' status by 2027. The river basin management plan also shows groundwater unit G32 (Farnborough & Bagshot Beds) as being of good quality and has the designation 'Drinking Water Protected Area'.

The east of the Borough is located within catchment unit R19 and R20 which covers the Addlestone Bourne (West End to Hale/Millbourne in R19) and Hale/Millbourne (Bagshot to Addlestone Bourne confluence near Chobham in R20) The ecological quality of unit 19 is moderate. The ecological quality of unit R20 is also moderate with the aim to achieve good status by 2027. Groundwater unit G6 (Chobham Bagshot Beds) covers the east of the Borough and its status is poor, with the aspiration of achieving good qualitative status by 2027. The groundwater unit also has a designation of 'Drinking Water Protected Area'.

In terms of water resource Surrey Heath lies in an area of water stress as identified by DEFRA. The Water provider for the west of the Borough is South East Water and in the east is Veolia Water. The Basingstoke Canal suffers from water shortages, especially in the summer months and this is reflected in the condition status of the SSSI.

South East Water's Water Resource Management Plan (WRMP) identifies the west of the Borough within Resource Zone 4, which is expected to remain in surplus up to 2035 albeit by transferring water from Resource Zone 5 and planning for additional supply. The study tested the Water Resource Zone's deployable output in response to climate change. This was tested against three scenarios of climate change effects: 'dry' (worst case) scenario, 'mid' scenario and 'wet' (best case) scenario. Water Resource Zone 4 was shown to be relatively unaffected by the 'mid' and 'wet' scenarios. Only the 'dry' scenario demonstrated a significant adverse impact.

The east of the Borough falls within the Southern Resource Zone in the Veolia Water Resource Management Plan (Central). The Veolia WRMP proposes that supply will be maintained over the period to 2035 through water metering coupled with further leakage reductions.

The Loddon Abstraction Licensing Strategy (CAMS) produced by the Environment Agency (EA) identifies the west of the Borough as within Assessment Point Catchment 7 – Blackwater (AP7B). AP7B is classified as having 'water available' although it informs that this status is overridden by the flow requirements of the Thames, which modifies the status to 'Water not available'. Recourse reliability for consumptive abstraction is determined through an availability test which indicates availability for AP7B at less than 30% of the time (the lowest of 5 categories).

The Environment Agency's Thames Catchment Abstraction Licensing Strategy (TCAMS) identifies the east of the Borough as within AP6 – Kingston Catchment Area (AP6K). The entire TCAMS catchment area has a bespoke licensing strategy which allows for greater water availability than the baseline conditions. Following the application of this strategy, AP6K is classified as having 'restricted water available', subject to water flow levels. Consumptive abstraction is indicated as available for more than 70% of the time.

A small area of the Borough around Deepcut lies within the Wey Catchment Abstraction Licensing Strategy at AP6 – Hoe Stream. This unit is shown as having 'water available' though again, this status is overridden by the flow requirements of the Thames. Consumptive abstraction is indicated as available less than 30% of the time.

Trends

It is considered likely that the ecological and chemical status of the river Blackwater, Hale/Millbourne and Bourne will improve over time given the environmental objectives contained within the Urban Waste Water Treatment Directive and Water Framework Directive. The South East is likely to remain an area of high water stress, although South East Water and Veolia predict water availability up to 2035.

Changes to the Building Regulations and planning policies in terms of water efficiency could help to reduce water demand in the future, however this may be off-set by increases in the local and wider population. Development at the Princess Royal Barracks in Deepcut may help to recharge water to the Basingstoke Canal.

Key issues

Issue	Source	How might the Local Plan address this?
South East will remain an area of high water stress	Baseline Information	Policy should set criteria in order to achieve water efficiency in new development. Through good design principles, policy should ensure water consumption in residential development is reduced to more efficient standards.

Waste

Surrey Heath Borough Council is the waste collection authority in Surrey Heath, whilst Surrey County Council is the waste disposal authority. The Borough Council only collects waste from households and does not collect any commercial, industrial or hazardous waste.

There is currently a general trend of increasing household waste levels in Surrey Heath, however since the introduction of a bi-weekly refuse collection and implementation of specialised recycling bins for each household, recycling rates have improved dramatically and are now consistently above both the averages for the South East and for England. Since 2013/14 the rates are slightly lower than in previous years, which can be accounted for by changes made to materials that are considered suitable or unsuitable for recycling. In terms of the overall recycling rate, the national target of '50% by 2020' as set out in the Waste Strategy 2007 has consistently been exceeded by Surrey Heath since the year 2009/2010.

The Surrey Waste Core Strategy (2011) does not identify any areas or sites within Surrey Heath for the allocation of waste facilities. However, two sites within existing Core Employment Areas in Camberley are mentioned as possible waste management facilities. Surrey County Council is currently in the process of producing the Surrey Waste Local Plan, which will ultimately replace the adopted Waste Core Strategy.

Trends

With an increasing population household waste levels within Surrey Heath are likely to increase further. High recycling rates are likely to be maintained, and the scope for improving rates through the Local Plan will be limited.

Key issues

Issue/ problem	Source	How will the Local Plan address this?
Waste levels continue to increase	Baseline Information	Policy should ensure development incorporates sufficient space for waste storage. Sustainable design should be encouraged, where there is ample opportunity for recyclable waste storage, inclusive of a wide range of recyclable materials and provision for composting.

Appendix III: Policy alternatives

Introduction

As discussed in Section 4, whilst the focus of work to explore ‘reasonable alternatives’ has been on the matter of the spatial growth strategy (‘growth scenarios’), supplementary work was also undertaken to define and appraise alternative approaches to addressing thematic development management policy issues / objectives.

A screening exercise was completed that led to a decision to focus attention to two thematic policy areas, on the basis that it was considered likely that alternative policy approaches could be identified with differential ‘significant effects’ in terms of one or more elements of the SA framework (see Section 3), specifically:

- Decarbonisation
- Biodiversity net gain

These two thematic policy areas are discussed in turn below.

Decarbonisation

Introduction

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

Selecting reasonable alternatives

Surrey Heath Borough Council declared a climate emergency in October 2019, following declaration of a national climate emergency in May 2019, and the passing into law of an amendment to the Climate Change Act 2008 in July 2019, which set 2050 as the national **net zero** target date. This target date was set broadly in line with the recommendations of the Climate Change Committee, which reflected the international “Paris Agreement” (2015). Most recently, in April 2021, the UK Government committed to an interim target of 78% reduction against 1990 levels by 2035, in line with a further recommendation made by the Climate Change Committee.

The Council has committed to **2030** as a date to achieve net zero in respect of its own operations as an organisation, but has not set an overall net zero target date for the Borough. According to a National Audit Office Report (2021),⁴⁷ more than one-third (38%) of authorities nationally have adopted a commitment to decarbonise their local area by or before 2030, for example nearby Wokingham and Bracknell Forest have both set 2030 as a net zero target date. An earlier study by the Climate Change Committee (2020) found that: “*Over 300 local authorities have declared Climate Emergencies... More than half of these have a Net Zero target date of 2030.*”⁴⁸

Important context comes from the **Surrey Climate Change Strategy** (2020), which sets out a decarbonisation pathway (or ‘trajectory’), with the aim of achieving net zero by 2050. Several interim targets are highlighted along the course of this trajectory, including the target of achieving an 80% reduction against 2019 levels by 2035. The strategy then goes on to discuss priority decarbonisation measures under a series of headings.

The focus here is greenhouse gas emissions from the **built environment**, and in particular from homes. The Surrey Heath Climate Change Study (2020) found that domestic greenhouse gas emissions currently account for around 41% of total emissions, with this set to increase to 51% by 2040.⁴⁹ This anticipated percentage increase reflects an assumption that transport emissions will decrease significantly, due to the switch-over to electric.

Furthermore, it is important to recognise that this large increase in the proportion of total greenhouse gas emissions attributed to domestic buildings is predicted *in spite of* an assumed major reduction in domestic emissions due to electricity use, which reflects the anticipated decarbonisation of the national grid. The implication is that it is continued use of **natural gas** that is the issue for built environment emissions.

Gas is used primarily for heating our homes, hence decarbonising **domestic heating** is seen as a national decarbonisation priority. This point came through clearly within the Government’s Ten Point Plan for a Green Industrial Revolution (2020), with “Point 7: Greener Buildings” focused almost exclusively on decarbonising heating, which means both reducing the demand for heating through efficiency measures and decarbonising sources of

⁴⁷ See nao.org.uk/wp-content/uploads/2021/07/Local-government-and-net-zero-in-England-Summary.pdf

⁴⁸ See theccc.org.uk/wp-content/uploads/2020/12/Local-Authorities-and-the-Sixth-Carbon-Budget.pdf

⁴⁹ See surreyheath.gov.uk/sites/default/files/Surrey%20Heath%20Local%20Plan%20-%20Climate%20Change%20Study.pdf

heat. The Ten Point Plan also notably highlighted that interventions to deliver ‘greener buildings’ are associated with potential greenhouse gas emissions savings far in excess of other interventions - see Table 5.1, above.

Emissions associated with heating are known as **regulated operational emissions**, in that they are covered by the Building Regulations and associated with the operational use of the building. There is also a major focus nationally on minimising unregulated emissions - including both operational (including electricity use for TVs, personal computers and other ‘plug in loads’) and non-operational (i.e. emissions associated with a buildings lifecycle regardless of its operational use); however, the focus here is on *regulated operational emissions*.

The question, therefore, is whether and how to set requirements that depart from (i.e. are more stringent than) the requirements of the **Building Regulations**. It has recently been clarified (following a lack of clarity of recent years) that it *is* within the remit of Local Plans to do so. This clarity was provided in the Government’s response to the Future Homes Standard consultation, in January 2021.⁵⁰ Most recently, in 2022, the Government explained:⁵¹

“Local authorities have the power to set local energy efficiency standards that go beyond the minimum standards set through the Building Regulations, through the Planning and Energy Act 2008. In January 2021, we clarified in the Future Homes Standard consultation response that in the immediate term we will not amend the Planning and Energy Act 2008, which means that local authorities still retain powers to set local energy efficiency standards that go beyond the minimum standards set through the Building Regulations.”

However, at the same time, the Government confirmed that it will be tightening Building Regulations over the coming years, to the point whereby the Regulations require achievement of a defined **Future Homes Standard** (FHS) by 2025. As an interim step towards the FHS, Building Regulations carbon emissions standards will be tightened by 31% in 2022. The Government has also consulted on a Future Buildings Standard for non-residential.

As such, there is arguably relatively little to be gained by setting local policy on regulated operational emissions. Rather, there is an argument for deferring to the Building Regulations, in light of the Government’s FHS commitments, and recognising that there is merit to a consistent national approach and, in turn, a helpful degree of certainty for the development industry.

However, on the other hand, there is an argument for requiring a 31% improvement on Building Regulations through the LPDMP, as a contingency for unforeseen delays to the FHS timetable. This is the “do minimum” approach recommended by the UKGBC Policy Playbook (2021), which explains:

“[T]he Future Homes Standard consultation concluded that a 31% reduction in carbon emissions compared to the current Part L is viable now on a national scale. Indeed the Government confirmed on 19 January 2021 that this 31% uplift will now come into effect in 2022. It is critical to reduce carbon emissions from new homes if the Government’s net zero emission target is to be met. Given this urgency, there is no credible reason to delay the implementation of the 31% reduction target in the wait for the Part L performance uplift.”

On this basis, requiring a 31% reduction in regulated operational emissions compared to the requirements set out in the current Building Regulations, is a reasonable option for the Local Plan.

It is difficult to suggest that a higher percentage reduction figure is reasonable, on development viability grounds, nor is there any reason to explore a lower figure. A 19% reduction figure is required through a number of recent Local Plans, following a Written Ministerial Statement in 2015 (linked to Level 4 of the Code for sustainable Homes);⁵² however, work at the national scale has now established that a 31% reduction is viable.

N.B. whilst some local authorities are requiring, or proposing to require, net zero development through their Local Plans, this necessitates offsetting residual emissions; for example, the London Plan sets out proposals clearly [here](#), explaining that the requirement is to achieve a 35% reduction onsite with remaining emissions offset. The 31% requirement under discussion here is one that must be met *onsite*, without resorting to offsetting.

In conclusion, on the basis of the discussion above, there are two reasonable “do something” policy options:

- **Option 1** – encourage / support schemes that go beyond the requirements of Building Regulations and encourage / support a fabric first approach.
- **Option 2** – as per Option 1, but additionally require that larger schemes achieve a **31%** reduction in regulated operational emissions (onsite) compared to the requirements set out in the current Building Regulations.

⁵⁰ See [gov.uk/government/consultations/the-future-homes-standard-changes-to-part-l-and-part-f-of-the-building-regulations-for-new-dwellings](https://www.gov.uk/government/consultations/the-future-homes-standard-changes-to-part-l-and-part-f-of-the-building-regulations-for-new-dwellings)

⁵¹ See [gov.uk/government/publications/local-government-and-the-path-to-net-zero-government-response-to-the-select-committee-report/local-government-and-the-path-to-net-zero-government-response-to-the-select-committee-report](https://www.gov.uk/government/publications/local-government-and-the-path-to-net-zero-government-response-to-the-select-committee-report/local-government-and-the-path-to-net-zero-government-response-to-the-select-committee-report)

⁵² Also, A 20% reduction was presented as an option as part of the Government’s FHS consultation (2019); however, the 20% ‘option’ presented in the FHS consultation document was described as ‘Future Homes Fabric’, in that the expectation was that the improvement would be achieved through fabric/efficiency improvements alone.

It is recognised that there are other policy options that could potentially be explored, for example options involving net zero carbon development via offsetting, and options that involve specifying *how* onsite emissions reductions should be achieved;⁵³ however, the two options presented above are considered reasonable.

Alternatives appraisal findings

The aim of this section is to present an appraisal of the alternatives introduced above, in summary:

- **Option 1** – encourage / support schemes that go beyond the requirements of Building Regulations.
- **Option 2** – require that larger schemes achieve a 31% improvement on the current Building Regulations.

With respect to methodology:

An appraisal of these alternatives is presented below in an appraisal ‘matrix’. Within each of row of the matrix, the aim is to explore the merits of the alternatives in respect of one aspect of the SA framework (see Section 3). Specifically, within each row, the aim is to both A) rank the alternatives in order of preference, with “=” used where it is not possible to meaningfully differentiate the alternatives, and “?” used to highlight uncertainty; and B) predict ‘likely significant effects’ on a five point scale.⁵⁴

Every effort is made to predict effects / differentiate the alternatives accurately; however, this is inherently challenging given the high level nature of the alternatives. The ability to predict effects / differentiate accurately is also limited by understanding of the baseline (now and in the future under a ‘no plan’ scenario). In light of this, there is a need to make considerable assumptions regarding how alternatives will be implemented ‘on the ground’ and what the effect on particular receptors will be. Assumptions are explained as far as reasonably possible, recognising the need to also ensure conciseness and readability.

Finally, it is important to note that effects are predicted taking into account the criteria presented within the SEA Regulations (Schedules 1 and 2). For example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. the effects of the plan in combination with other planned or on-going strategic activities).

Decarbonisation – alternatives appraisal

Topic	Option 1	Option 2	Discussion
Air quality	=	=	The Future Homes Standard (FHS) consultation document (2019) set out that the Government’s preferred approach, in respect of an interim uplift to Building Regulations, ahead of a further uplift to the FHS, was to require a 31% reduction in emissions compared to the requirements set out in the current Building Regulations. This preferred option was confirmed by the Government’s response to the consultation (2021), and the Net Zero Strategy (October 2021) committed to amending Building Regulations in 2022, to bring the interim uplift into force. The most recent situation is explained by the Government in a response to a Select Committee Report here : “On 15 December, we implemented an uplift for new homes. This is a key stepping-stone that will enable us to successfully implement the Future Homes Standard. Once the uplift comes into force, new homes will be expected to produce around 30% fewer CO2 emissions compared to current standards.”
Biodiversity	=	=	
Climate change adaptation	=	=	
Climate change mitigation	=	=	
Digital infrastructure	=	=	
Economy	=	=	
Education	=	=	
Employment land	=	=	
Flood risk	=	=	

⁵³ For example, the UKGBC Policy Playbook (2021) suggests that, as a minimum, Local Plan policy should require: “A fabric first approach shall be prioritised, ensuring that at a minimum the thermal performance of the whole envelope exceeds that of the notional specification by 5%.” Furthermore, the UKGBC Policy Playbook (2021) recommends that Local Plans give consideration to a host of other policy options relating to built environment emissions, covering operational emissions (regulated and unregulated), non-operational emissions and more. However, there are question-marks regarding the viability of such policy options, and there are concerns regarding creating a complex and confusing policy environment, and uncertainty for the development industry.

⁵⁴ **Red** indicates a significant negative effect; **amber** a moderate or uncertain negative effect; no colour indicates neutral or uncertain effects; **light green** indicates a moderate or uncertain positive effect; and **dark green** indicates a significant positive.

Health	=	=	It is recognised that setting out the requirement within policy could help to ensure that additional cost implications can be taken into account by the development industry at the earliest opportunity, with a view to avoiding conflict with wider sustainability objectives (e.g. in respect of affordable housing needs). There is also a need to encourage the development industry to give early consideration to precisely how the new emissions requirements will be met in a best practice fashion, for example by taking a fabric first approach that does not unduly impact development viability (e.g. thicker walls impact layouts) and that ensures good ventilation without resort to mechanical ventilation technologies (which require careful operation and maintenance). However, the overriding consideration is a need to set draft policy now that is reflective of the likely national context at the time when the Local Plan is submitted for examination. In other words, it would not be appropriate to publish a policy for consultation now that in all likelihood will become out-of-date, and need to be re-drafted, prior to submission.
Historic environment	=	=	
Housing	=	=	
Land	=	=	
Landscape and townscape	=	=	
Poverty	=	=	
Previously developed land	=	=	
Rural economy	=	=	
Safe / secure communities	=	=	
Vibrant communities	=	=	
Waste	=	=	In conclusion, Option 1 is supported from a decarbonisation perspective. Whilst the proposal is only to 'support and encourage' schemes that show ambition, this can and likely will lead to on-the-ground benefits. It is not possible to suggest that Option 2 is notably preferable, from a decarbonisation perspective, given the anticipated timetable for implementing the 31% uplift to Building Regulations. In respect of other sustainability topics the options do not lead to any notable implications.
Transport	=	=	
Water quality	=	=	

Selecting the preferred option

The following text is provided by SHBC officers:

Option 1 is the preferred option, in light of the anticipated timetable for tightening Building Regulations, and given the importance of ensuring flexibility. It is recognised that this is a fast paced policy area, and that there are many detailed considerations that must feed-into planning for low carbon new homes (e.g. see the figure below). The Council will be undertaking a whole plan viability study subsequent to finalisation of the Local Plan for Regulation 19 publication, and that study will explore the potential to set more or less stringent policy requirements under a number of headings, but it is currently not anticipated that the study will explore setting local policy in respect of built environment greenhouse gas emissions.

A figure taken from the UK Heat and Buildings Strategy (2021)

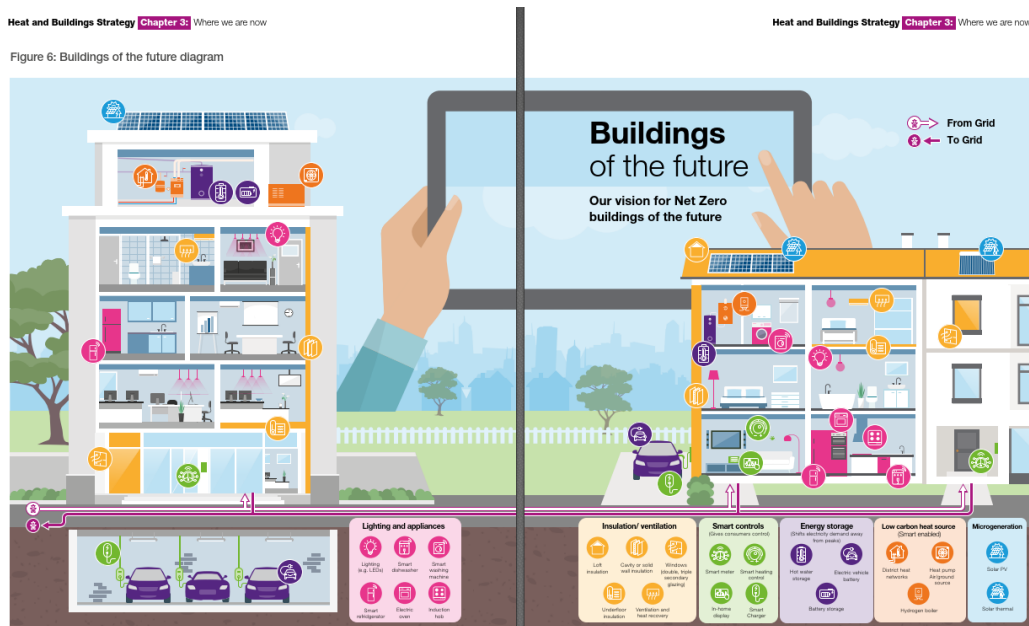


Figure 6 demonstrates an example of how buildings in the future may be designed to use and store energy in a more efficient integrated way. Key elements include: the use of a low-carbon source of heat, measures to ensure high thermal and energy efficiency, and the use of smart technologies.

Biodiversity net gain

Introduction

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

Selecting reasonable alternatives

A central requirement of **Environment Act** (2021) is that development schemes achieve a 10% biodiversity net gain. This will be measured at the planning application stage, applying the latest Defra ‘metric’, but there is increasing recognition of an important role for Local Plans, including coordination of offsite compensatory habitat enhancement and creation (also referred to as ‘offsetting’). There is also the potential for Local Plans to set a higher percentage net gain requirement, as recently explained by the Government:⁵⁵

“It remains the UK government’s intention to continue to allow higher percentage targets to be set by planning authorities at a local or site level. Any higher target should be made clear at an early stage in the planning or development process and careful consideration should be given to the feasibility and achievability of any requirements above 10 per cent, which can have significant impacts on the costs of developing a site.”

The option of setting a higher percentage requirement is now often a matter for close consideration through Local Plan-making, mindful of implications for development viability. For example, nearby Guildford Borough Council recently published a policy requiring 20% biodiversity net gain for consultation under Regulation 19 of the Local Planning Regulations. The earlier draft version of the plan published for consultation under Regulation 18 also included the 20% requirement, and consultation responses received included:

- Natural England – did not comment specifically on the percentage requirement, but through subsequent correspondence confirmed: *“Natural England welcomes an ambitious 20% net gain target for developments.”*
- The Environment Agency – *“We fully support... the commitment for 20% biodiversity net gain (BNG). We’re really pleased to see the Council striving for a higher figure than the minimum figure proposed by Government and mandating BNG for developments not mandated by Government.”*
- The Woodland Trust – *“We welcome the policy, including strong support for proposals to pursue a net gain minimum target of 20% published the preferred option for consultation.”* The Trust also notably went on to discuss how: *“Appropriate site selection is essential to delivering biodiversity gain...”*
- The Home Builders Federation – objected to the proposal, including on the basis that departing from the nationally prescribed standard (10%, which is set to be mandated through the Environment Bill) would *“inevitably create a conflict with legislation and create confusion and delay.”*

Cambridge City and South Cambridgeshire Councils are also now set to adopt a Supplementary Planning Document (SPD) that encourages 20% BNG, with a recently published [report](#) explaining key reasons as follows: *“... in recognition of the Councils’ declared Biodiversity Emergencies and low baseline of protected and priority habitats within Greater Cambridge, the aspiration within the SPD has been retained to support and encourage developments to maximise opportunities for biodiversity enhancement.”*

Further contextual discussion is presented in Section 5.3, above.

In light of these points, it is clearly reasonable and appropriate to test alternatives, in respect of the percentage BNG that must be achieved by qualifying development proposals. Specifically, it is logical to test:

- **Option 1** – require **10%** biodiversity net gain (N.B. this is a “do something” option on the basis that the national requirement will come into force two years after the Environment Act being enacted).
- **Option 2** – require **20%** biodiversity net gain

Alternatives appraisal findings

The aim of this section is to present an appraisal of the alternatives introduced above. With respect to methodology, see discussion above under ‘Decarbonisation’.

⁵⁵ See consult.defra.gov.uk/defra-net-gain-consultation-team/consultation-on-biodiversity-net-gain-regulations/

Biodiversity – alternatives appraisal

Topic	Option 1	Option 2	Discussion
Air quality	=	=	<p>There are clear biodiversity arguments for seeking to go beyond the nationally prescribed minimum approach. Firstly, this is on the basis of rates of biodiversity loss in Surrey.⁵⁶ Secondly, there are naturally concerns regarding the BNG approach failing to achieve stated biodiversity objectives, and perhaps even resulting in perverse long-term effects that are currently difficult to foresee or fully appreciate, because approaches and methods are in their infancy, and recognising that a focus on BNG will be, to some extent, at the expense of a focus on more traditional approaches to biodiversity conservation and enhancement. For example, CIEEM have discussed a concern that a 10% net gain requirement could be “within the margin of error”, such that it doesn’t deliver “real benefits” in practice.⁵⁷ At the current time, the Biodiversity Metric 3.0 is a proactive and positive step, and progress on bringing forward effective Local Nature Recovery Strategies (LNRs), both nationally and locally (specifically, work is underway at the Surrey scale), is encouraging; however, <i>ze Ermgassen et al. (2021; see summary in Section 5.3)</i> highlight some significant concerns, including around a piecemeal approach to implementation of biodiversity net gain through planning applications whereby the combined effect is less than the sum of its parts. Biodiversity must be considered at landscape scales and with a long-term perspective, hence it is important that BNG approaches lend support to strategic initiatives, and certainly do not distract from, or lessen the focus on, such initiatives. On one hand, this lends support for requiring a higher (20% net gain figure). However, on the other hand, in the SHBC context there is likely to be relatively good potential for strategically targeted offsite measures given experience of SANG delivery to ensure effective avoidance and mitigation of recreational impacts to the Thames Basin Heaths SPA. Whilst there are tensions between SANG objectives (focused on access) and BNG objectives, and there is a need to ensure ‘additionality’ if and when SANG is used to secure biodiversity credits (i.e. interventions must be additional to what would not have happened in any case), there is cautious optimism regarding the potential for effective and efficient implementation of BNG in the SHBC context.</p> <p>With regards to non-biodiversity objectives, the first point to consider is whether and to what extent there is a risk of 20% BNG leading to a cost on the development industry that reduces funds available for measures focused on the achievement of non-biodiversity objectives, or perhaps even a situation whereby development becomes unviable. These matters may need to be explored in detail through a viability study (e.g. BNG was a focus of the Viability Study for the recent Guildford Development Management Policies Plan). However, at the current time, it is appropriate to flag a risk of Option 2 impacting on the ability to viability address wider policy objectives. Whilst there is little or no certainty, it is appropriate to flag a particular concern regarding affordable housing delivery, which can be, and often is, a matter for negotiation at the development management stage on viability grounds. There are concerns with affordable housing delivery locally, plus there is a need to be mindful that the situation could potentially worsen, if the housing market were to weaken, plus there is a need to consider implications of First Homes policy.</p>
Biodiversity	2	1	
Climate change adaptation	=	=	
Climate change mitigation	=	=	
Digital infrastructure	=	=	
Economy	=	=	
Education	=	=	
Employment land	=	=	
Flood risk	=	=	
Health	=	=	
Historic environment	=	=	
Housing	1	2	
Land	=	=	
Landscape and townscape	=	=	
Poverty	=	=	

⁵⁶ This is a key reason why a [Surrey Nature Partnership Position Statement](#) recommends 20% BNG. However, it is recognised that there is a need to apply caution when comparing rates of biodiversity loss at national and local levels; for example, a species could become locally extinct whilst populations remain relatively healthy at the national scale.

⁵⁷ See cieem.net/wp-content/uploads/2019/02/CIEEM-Net-Gain-consultation-response-Feb2019-FINAL.pdf

Previously developed land	=	=	A further consideration is whether a 20% BNG policy could disproportionately affect the viability of smaller sites, which are important from a perspective of meeting housing delivery targets and housing needs in rural areas, and importantly support SME house builders. Disproportionate impacts are not envisaged, but there is an element of residual risk, ahead of BNG approaches and methods maturing.
Rural economy	=	=	
Safe / secure communities	=	=	Finally, there is a need to recognise that an ambitious approach to BNG will also translate into additional ecosystem service benefits to communities, for example in terms of recreation and flood risk. There has been a considerable amount of work nationally to explore how to take the step from a BNG approach to an environmental net gain (ENG) approach; for example, Natural England published a beta Environmental Benefits from Nature (EBN) tool in July 2021; ⁵⁸ also, CIEEM has advocated for ENG. ⁵⁹ However, even if the focus is on BNG, as opposed to wider (and far more complex) ENG, there will still be wider ecosystem service benefits (albeit recognising that there can also be tensions between achieving biodiversity and wider ecosystem service benefits).
Vibrant communities	=	=	
Waste	=	=	In conclusion, an ambitious approach to BNG is supported in respect of the majority of objectives, although there is an element of risk in respect of housing objectives. Risks are uncertain ahead of detailed viability testing.
Transport	=	=	
Water quality	=	=	With regards to effect significance, it is possible to predict likely significant positive effects under Option 2 in respect of biodiversity, with other effects much more uncertain and likely to be of lower significance.

Selecting the preferred option

The following text is provided by SHBC officers:

Option 2 is the preferred option. The 20% requirement exceeds the 10% figure recommended nationally but reflects the fact that Surrey has suffered a severe biodiversity decline which is significantly worse than the country as a whole, and is more consistent with the NPPF as the higher figure provides greater certainty that a genuine net gain will be achieved.

Finally, it is important to clarify the Council's proposed approach includes setting supplementary requirements and expectations in respect of:

- Off-site measures - where the full required net gain cannot be achieved on a development site, the remaining gain may be achieved outside the development site, either by the developer or by a third party. In the unlikely event that the required gains cannot be provided through these routes, the Council may negotiate a financial contribution which will be used to secure the required gain by obtaining credits from a 'habitat bank'.
- BNG measures on SANG – measures must complement the recreational purpose and uses of the SANG, and must provide measurable additionality over and above the minimum requirements of the SANG.
- Stewardship - all habitat that is created or enhanced in order to meet the net gain requirement is required to be secured and maintained for at least 30 years.
- Baseline biodiversity units - the biodiversity value of a development site must not be artificially reduced before the baseline for the net gain is set. Where the Council considers that on-site habitat has been degraded or removed intentionally, it will require the baseline to reflect at least the full biodiversity value of the site before the degradation occurred and will apply any punitive measures set out in legislation. Biodiversity sites must likewise not be intentionally cleared or degraded in order to increase the potential for biodiversity gain.

⁵⁸ See ecosystemsknowledge.net/Environmental-Benefits-from-Nature

⁵⁹ CIEEM explain: "Whilst it might seem that both developers and ecologists are still getting to grips with Biodiversity Net Gain (BNG) and offsetting, it is clear that the direction of policy travel in several territories around the world is towards utilising a wider Environmental Net Gain (ENG) approach... This has recently been reinforced by the Natural Capital Committee: "The government should urgently replace biodiversity net gain with environmental net gain, ensuring this applies to all nationally significant infrastructure and the marine environment. Delivery of net zero will become incredibly difficult, if not impossible, without environmental net gain – it is the only approach that considers the impact on the terrestrial and marine ecosystems, including biocarbon stocks." See <https://cieem.net/i-am/influencing-policy/strategic-policy-sub-committee/environmental-net-gain/>

Appendix IV: Chobham Green Belt RAs

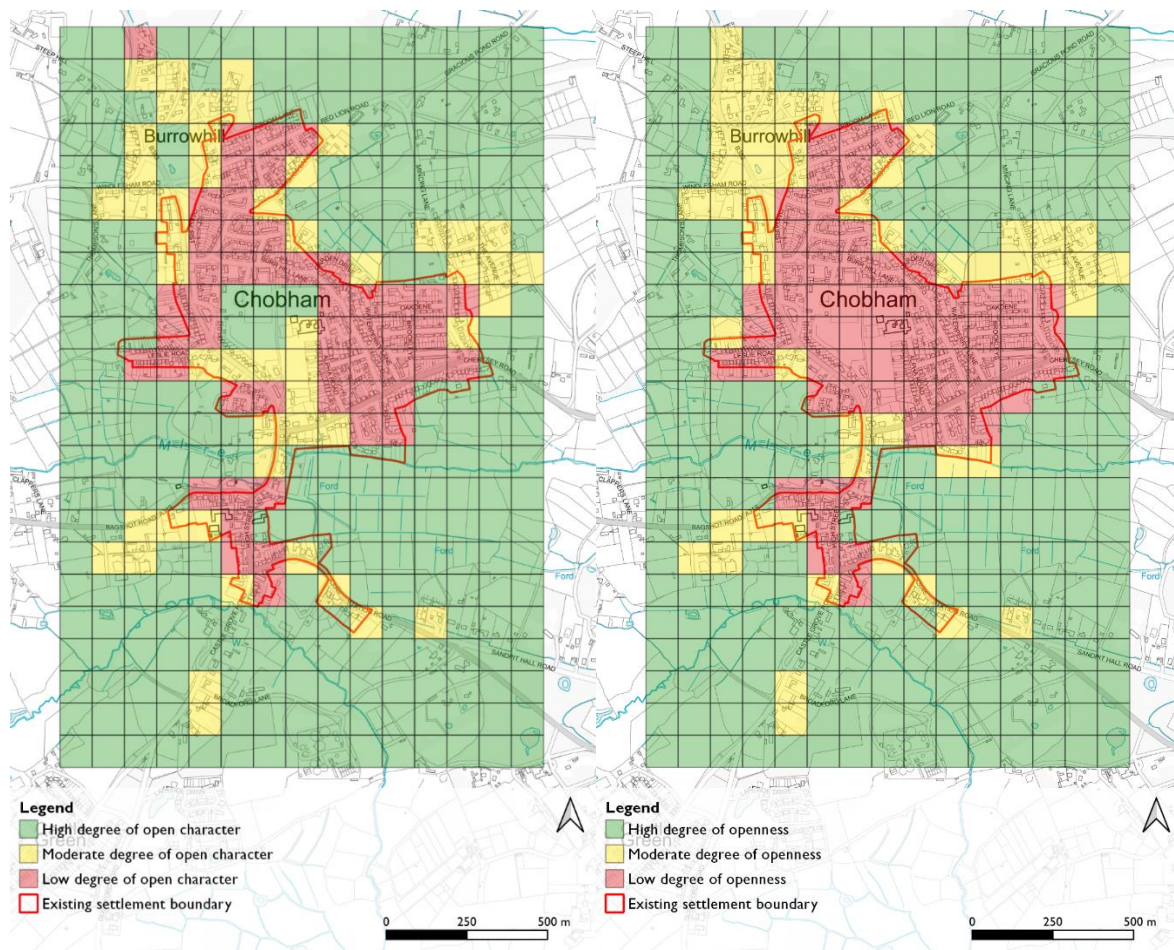
Introduction

As discussed in Section 4, whilst the focus of work to explore ‘reasonable alternatives’ has been on the matter of the spatial growth strategy (‘growth scenarios’), supplementary work was also undertaken to define and appraise alternative approaches to the matter of the Green Belt status of Chobham village.

Background

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

Figure A: Conclusions of the Green Belt Village Study



Selecting reasonable alternatives

With regards to the question of whether or not Chobham should be inset from the Green Belt, there is a strong argument to suggest that there is only one reasonable option, in light of the available evidence, which is to inset. However, because the issue is understood to be potentially somewhat contentious, the decision was made to appraise two reasonable alternatives:

- **Option 1** – so not inset Chobham village from the Green Belt
- **Option 2** – inset Chobham village from the Green Belt

Alternatives appraisal findings

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

Chobham village Green Belt – alternatives appraisal

Topic	Option 1	Option 2	Discussion
Air quality	=	=	It is difficult to differentiate between the alternatives with any degree of certainty, because whilst it is fair to assume that there would be some infilling / intensification of the built form, in the fullness of time, under Option 2, it is not possible to foresee where, or to what extent, this would occur in practice. N.B. the aim of this appraisal is not to consider the merits of specific sites, or any given specific approach to growth at Chobham through the Local Plan. Rather, the assumption, under Option 2, is that additional windfall development would come forward. The appraisal is undertaken mindful of growth at Chobham proposed through the draft Local Plan, including the proposed Rugby Club allocation for 91 homes. However, it is fair to highlight that Option 2 gives rise to tensions with historic environment objectives, over-and-above Option 1. There is no reason to suggest that there would be a 'significant negative effect' under Option 2, given that Local Plan policies would be in place to avoid or suitably mitigate the effects of any development, but it is fair to highlight a degree of concern. This is because there are no other comparable villages to Chobham – namely a village with a comparably high density of listed buildings, complete with a grade 1 listed parish church – in the Borough and, in fact, few if any across a wider area that extends well beyond the Borough. Another potentially relevant SA topic is 'biodiversity', given the inherent sensitivity of Chobham's position in the landscape, closely associated with Chobham Common. However, there is very little if any priority habitat located within the proposed settlement / Green Belt boundary, hence Option 2 is not judged to give rise to any notable concern over-and-above Option 1. In conclusion , Option 2 is clearly a positive step in respect of housing delivery, which is an important consideration given that Surrey Heath is 'exporting' unmet housing need to Hart District, and also given that there may be some locally arising housing needs at Chobham. Option 2 gives rise to tensions in respect of historic environment objectives, but significant negative effects are not predicted.
Biodiversity	=	=	
Climate change adaptation	=	=	
Climate change mitigation	=	=	
Digital infrastructure	=	=	
Economy	=	=	
Education	=	=	
Employment land	=	=	
Flood risk	=	=	
Health	=	=	
Historic environment	★1	2	
Housing	2	★1	
Land	=	=	
Landscape and townscape	=	=	
Poverty	=	=	
Previously developed land	=	=	
Rural economy	=	=	
Safe / secure communities	=	=	
Vibrant communities	=	=	
Waste	=	=	
Transport	=	=	
Water quality	=	=	

Selecting the preferred option

The following text is provided by SHBC officers:

As noted in Paragraph 144 of the NPPF, Green Belt should not be used to afford protection to a settlement unless warranted from a Green Belt perspective. Chobham has an attractive historic core, but that the settlement is historic is not sufficient reason in itself to warrant the retention of the Green Belt designation in this location. Local Plan policies as drafted are considered sufficiently robust in order to ensure that development coming forward across the Plan period within Chobham is suitable from a character perspective, however there is an opportunity to develop an up to date Conservation Area Character Appraisal and Management Proposals document to ensure that the significance of the conservation area and the buildings within it are fully understood, to ensure that future development within the settlement is appropriate.

On this basis **Option 2** is the preferred option.

Appendix V: Site options GIS analysis

Introduction

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

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

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

Limitations

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

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

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

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

Structure of this appendix

Set out below is:

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

Methodology

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

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

- Much data is available nationally, including data for air quality management areas, national biodiversity and historic environment designations and the nationally defined flood risk zones.
- There is no regional or sub-regional data repository (or 'observatory', e.g. as per that currently [under development](#) for the Oxford to Cambridge Arc).

- Much data is held by the Council, including as shown at: <https://surreyheath.gov.uk/maps>. There is a need to focus on data that is held for the Borough as a whole, as opposed to data covering only part of the Borough.

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

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

Having generated the spreadsheet of data, the third and final step was then to interrogate, utilise and report the data – see discussion below.

Analysis outcomes by metric

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

Air quality

Air quality management area (AQMA)

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

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

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

Average distance to an AQMA

Category of site	Distance (m)
Permitted	2741
Deliverable/developable	2159
Discounted but shortlisted in Section 5.4	3208
Discounted	2554

Strategic Road Network (SRN)

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

13 sites are within 50m, and so are judged to stand out as **performing poorly**. Of these sites, four are deliverable or developable (closest being 8m) and two are discounted SLAA sites that are shortlisted in Section 5.4, with the remaining six being discounted SLAA sites.

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

Biodiversity

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

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

Special Protection Area (SPA)

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

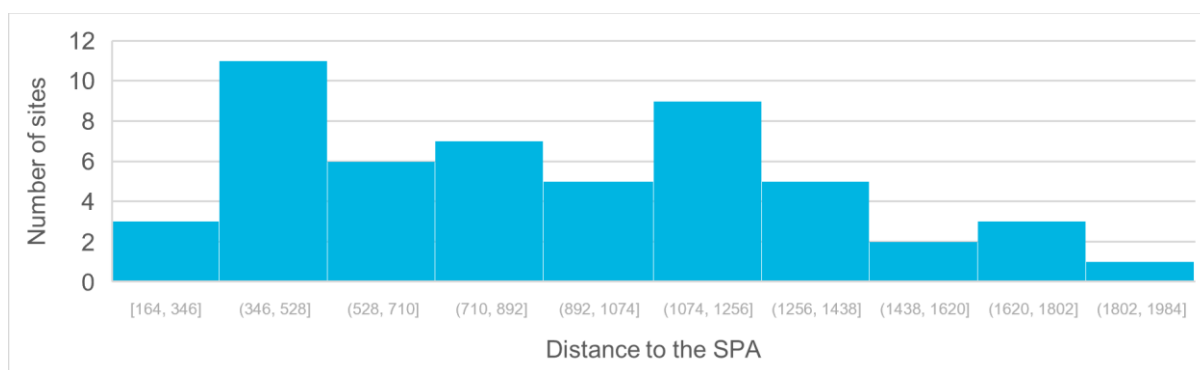
Beyond 400m there are well-established mechanisms in place to ensure that impacts on the SPA are avoided or suitably mitigated, including by ensuring sufficient Suitable Alternative Natural Greenspace (SANG) to avoid worsened recreational pressure on the SPA. Specifically, there is a requirement to provide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

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

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

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

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



Site of Special Scientific Interest (SSSI)

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

It is difficult to know how best to categorise the performance of site options in respect of distance to a SSSI. On balance, it is considered appropriate to highlight the 12 sites within 50m of a SSSI as **performing poorly**, which includes four (housing) sites in proximity to the Basingstoke Canal SSSI, which includes two sites identified as deliverable or developable by the SLAA, and one site discounted by the SLAA but shortlisted in Section 5.4, above.

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

Site of Nature Conservation Importance (SNCI)

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

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

Ancient woodland

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

One site intersects ancient woodland (Fairoaks) and another is 24m distant (discounted by the SLAA but shortlisted in Section 5.4 of this report). These site stand-out as **performing poorly**.

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

Priority habitat

22 sites significantly intersect priority habitat (>20%), and are judged to stand-out as **performing poorly**. Of these sites, one site is permitted, six are identified as deliverable by the SLAA and a further five are discounted by the SLAA but shortlisted in Section 5.4 of this report.

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

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

Tree Preservation Orders

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

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

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

Summary of average distance / intersect with biodiversity designations

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

Historic environment

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

Conservation area

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

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

Listed building

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

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

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

Registered park or garden (RPG)

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

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

Scheduled monument

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

Locally listed buildings

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

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

Archaeology area

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

Flood risk

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

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

Communities

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

Town centre

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

District or local centre, or neighbourhood parade

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

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

School

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

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

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

Train station

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

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

Bus stop

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

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

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

Greenspace

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

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

Nature reserve

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

Index of Multiple Deprivation (IMD)

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

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

Green Belt

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

Analysis outcomes by site option

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

Structure of the table

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

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

- Sites with **planning permission**, including all that feature in the SLAA and select other sites.
- Sites identified as **deliverable or developable** by the SLAA
- Sites discounted by the SLAA but progressed to the **reasonable growth scenarios** (Section 6)
- Other sites **discounted** by the SLAA

Thirdly, within the "Type" column, the one site proposed for **SANG** is highlighted. The analysis is clearly of limited relevance to this site.

Fourthly, within the "# homes" column, sites **above 25 homes** and hence allocated in the Local Plan are highlighted.

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

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

Site options GIS analysis

Ref	Sub area	Name	Status	Area (ha)	Type	# homes (C3)	AQMA	SRN	SPA	SSSI	SNCI	Ancient woodland	Priority habitat	TPO	Conservation area	Listed building	RPG	Locally listed	Archaeology	Flood zone	Town centre	Local centre	School	Train station	Bus stop	Nature reserve	Greenspace	IMD	Green Belt			
181	Bagshot	134 and 136 London Road	Permitted	0.3	C3																											
448		175 London Road	Deliverable	0.3	C3	8																										
407		Highways Farm, 226 London Road	Deliverable	0.4	C3	6																										
247		Bagshot Highway Depot, London Road	Developable	1.0	C3	50																										
408		Land rear of 192-210 London Road	Developable	1.3	C3	20																										
317		The Deans, Bridge Road	Developable	0.2	C3	20																										
714		Seal House, 56 London Road	Developable	0.1	C3	16																										
320		Tanners Yard, London Road	Developable	0.3	C3	9																										
901		212 London Road	Developable	0.4	C3	5																										
736		Grove End	Growth scenarios	4.3	C3																											
812		Swift Lane	Discounted	15	C3																											
446		Land at Notcutts, London Rd & west of Hawkesworth Dr	Discounted	7.4	C3																											
798		Land at Pennyhill, London Road	Discounted	7.3	C3																											

Ref	Sub area	Name	Status	Area (ha)	Type	# homes (C3)	AQMA	SRN	SPA	SSSI	SNCI	Ancient woodland	Priority habitat	TPO	Conservation area	Listed building	RPG	Locally listed	Archaeology	Flood zone	Town centre	Local centre	School	Train station	Bus stop	Nature reserve	Greenspace	IMD	Green Belt			
573	Bisley	317-319 Guildford Road	Deliverable	0.3	C3	17																										
763		Land at Elder Road	Developable	0.2	C3	9																										
236		Land rear of 309-315 Guildford Road	Developable	0.2	C3	6																										
740		Land East of Clews Lane	Growth scenarios	8.2	C3																											
800		The Miles Green Nursery	Growth scenarios	4.7	C3																											
902		Former Bisley FC	Growth scenarios	3.8	C3																											
903		Land South of Church Lane	Growth scenarios	1.8	C3																											
741		Land West of Guildford Road	Discounted	13	C3																											
865		84-100 Park Street	Permitted	0.4	C3																											
801	Camberley	Pinehurst, 141	Deliverable	0.8	C3	44																										
832		Land south of Bridge Road	Deliverable	0.1	C3	5																										
814		London Road Block	Developable	2.6	Mix	550																										
27		Land east of Knoll Road	Developable	2.3	C3	475																										
921		Land East of Park Street, North of Princess Way	Developable	0.4	C3	120																										

Ref	Sub area	Name	Status	Area (ha)	Type	# homes (C3)	AQMA	SRN	SPA	SSSI	SNCI	Ancient woodland	Priority habitat	TPO	Conservation area	Listed building	RPG	Locally listed	Archaeology	Flood zone	Town centre	Local centre	School	Train station	Bus stop	Nature reserve	Greenspace	IMD	Green Belt	
25		Camberley Station, Pembroke Broadway	Developable	0.4	C3	75	Orange	Green	Orange	Green	Green	Green	Green	Green	Green	Red	Green				Green	Green	Red	Orange	Green			Green		
878		Building B, Riverside Way	Developable	0.8	C3	52	Orange	Yellow	Orange	Green	Light Green	Green	Green	Green	Green	Yellow	Green				Red	Light Green	Green	Light Green	Yellow			Green		
240		Camberley Centre, France Hill Drive	Developable	0.9	C3	35	Orange	Green	Orange	Green	Light Green	Green	Green	Green	Green	Red	Green		Red		Green	Light Green	Orange	Green			Green			
21		61-63 London Road	Developable	0.3	C2	32	Orange	Green	Red	Yellow	Light Green	Green	Green	Green	Red	Red	Green		Yellow		Green	Light Green	Light Green	Light Green			Yellow			
833		York Town Car Park	Developable	0.5	C3	27	Yellow	Green	Orange	Light Green	Orange	Green	Green	Green	Green	Red	Orange				Green	Green	Green	Light Green			Orange	Light Green		
314		Travis Perkins, 280 Gordon Avenue	Developable	0.2	C3	15	Orange	Green	Light Green	Green	Green	Green	Green	Green	Green	Orange	Green				Green	Light Green	Light Green	Light Green			Light Green	Light Green		
295		439-445 London Road	Developable	0.1	C3	15	Yellow	Green	Orange	Light Green	Orange	Green	Green	Green	Green	Red	Orange		Yellow		Yellow	Light Green	Orange	Green			Light Green	Light Green		
424		Land rear of 1-47 Sullivan Road	Developable	0.2	C3	14	Orange	Green	Orange	Green	Yellow	Green	Green	Green	Green	Red	Green				Green	Green	Green	Light Green			Red	Light Green		
717		Burwood House Hotel, 15 London Road	Developable	0.2	C3	10	Orange	Green	Red	Light Green	Green	Green	Green	Green	Red	Yellow	Light Green				Green	Light Green	Light Green	Light Green			Green			
49		Peerless site North, Sullivan Road	Developable	0.6	C3	8	Yellow	Green	Orange	Light Green	Orange	Green	Green	Green	Green	Red	Light Green				Green	Light Green	Orange	Light Green			Red	Light Green		
877		26 Portsmouth Road	Developable	0.2	C3	8	Red	Green	Orange	Green	Green	Green	Green	Green	Green	Yellow	Green				Green	Light Green	Orange	Light Green			Red			
721		Central House, 75-79 Park Street	Developable	0.0	C3	6	Orange	Green	Orange	Green	Light Green	Green	Green	Green	Green	Red	Green				Green	Light Green	Red	Green			Yellow			
904		Land at Kings International College, Watchetts Drive	Discounted	12	C3		Red	Light Green	Light Green	Green	Green	Green	Light Green	Green	Light Green	Green	Yellow			Yellow	Light Green	Light Green	Green	Green			Red	Light Green		
37		Tekels Park	Discounted	4.5	C3		Red	Green	Yellow	Green	Red	Green	Red	Red	Red	Red	Green	Yellow		Green	Green	Red	Yellow	Yellow			Red			

Ref	Sub area	Name	Status	Area (ha)	Type	# homes (C3)	AQMA	SRN	SPA	SSSI	SNCI	Ancient woodland	Priority habitat	TPO	Conservation area	Listed building	RPG	Locally listed	Archaeology	Flood zone	Town centre	Local centre	School	Train station	Bus stop	Nature reserve	Greenspace	IMD	Green Belt	
802	Chobham	Four winds, 29 London Road, Camberley	Discounted	0.6	C3		Orange	Green	Orange	Light Green	Green	Green	Red	Red	Orange	Orange				Green	Light Green	Light Green	Light Green	Light Green			Yellow			
500		Church of St Peter, Caesars Camp Road	Discounted	0.3	C3		Orange	Green	Orange	Yellow	Green	Green	Green	Green	Yellow	Light Green				Green	Light Green	Light Green	Light Green	Light Green			Red	Light Green		
250		65-85 High Street	Discounted	0.3	C3		Orange	Green	Orange	Green	Green	Green	Green	Green	Red	Light Green				Green	Light Green	Red	Orange	Green			Green			
6		22 Crawley Hill	Discounted	0.3	C3		Red	Green	Yellow	Green	Green	Green	Green	Green	Light Green	Red	Light Green		Red		Green	Light Green	Light Green	Light Green	Light Green			Yellow		
804		Land East of Frimley Road, South of London Road	Discounted	0.3	C3		Yellow	Green	Orange	Green	Red	Green	Green	Green	Green	Red	Orange				Green	Light Green	Light Green	Light Green	Light Green			Orange	Light Green	
246		Old Dean Youth Centre, Kingston Road	Discounted	0.2	C3		Orange	Green	Red	Orange	Green	Green	Green	Green	Green	Light Green	Light Green				Green	Light Green	Light Green	Light Green	Light Green			Light Green	Light Green	
1003		St James House, Knoll Road	Discounted	0.2	C3		Orange	Green	Orange	Green	Green	Green	Green	Green	Green	Red	Light Green				Green	Light Green	Red	Orange	Green			Green		
1002		31 High Street	Discounted	0.0	C3		Orange	Green	Orange	Green	Light Green	Green	Green	Green	Green	Red	Light Green				Green	Light Green	Red	Orange	Green			Light Green		
1001		Chobham Club, 50 Windsor Road	Deliverable	0.3	C3	8		Light Green	Light Green	Red	Light Green	Light Green	Green	Green	Green	Red	Light Green		Yellow		Green		Light Green	Light Green	Orange	Light Green	Green			Yellow
447		Chobham Rugby Club, Windsor Road	Developable	3.5	C3	91		Light Green	Light Green	Red	Yellow	Orange	Green	Green	Green	Red	Light Green		Yellow		Green		Light Green	Light Green	Orange	Light Green	Red	Light Green		Yellow
548	Broadford, Castle Grove Road	Developable + Growth scenarios	2.2	C3	15		Light Green	Red	Yellow	Green	Red	Green	Red	Green	Red	Light Green			Yellow	Red		Light Green	Light Green	Red		Green			Yellow	
950	Fairoaks	Growth scenarios	153	Mix			Light Green	Red	Red	Yellow	Red	Red	Light Green	Green	Red	Light Green				Yellow		Red	Orange	Yellow		Red			Yellow	
238	Mincing Lane Nursery, Mincing Lane	Growth scenarios	1.6	C3			Light Green	Green	Red	Yellow	Red	Green	Red	Green	Red	Light Green		Yellow		Green		Light Green	Light Green	Orange	Light Green	Green	Light Green		Yellow	
546	Land rear of The Grange	Growth scenarios	1.5	C3			Light Green	Orange	Orange	Light Green	Light Green	Green	Red	Red	Red	Light Green			Yellow	Yellow		Light Green	Light Green	Orange		Light Green			Yellow	

Ref	Sub area	Name	Status	Area (ha)	Type	# homes (C3)	AQMA	SRN	SPA	SSSI	SNCI	Ancient woodland	Priority habitat	TPO	Conservation area	Listed building	RPG	Locally listed	Archaeology	Flood zone	Town centre	Local centre	School	Train station	Bus stop	Nature reserve	Greenspace	IMD	Green Belt							
597	Deepcut	Land northwest of The Grange	Growth scenarios	1.5	C3																															
918		9 The Avenue	Growth scenarios	0.7	C3																															
916		7 The Avenue	Growth scenarios	0.2	C3																															
543		Round Pond Nurseries, Windsor Road	Discounted	8.3	C3																															
751		3 Chobham Lane	Discounted	7.6	C3																															
414		Land north of Lakeside Drive	Discounted	3.5	C3																															
510		Land at Flexlands Farm, Station Road	Discounted	2.3	C3																															
917		Land Between 46 - 62 Mincing Lane	Discounted	1.8	C3																															
843		Former Plants to Go, Bagshot Road	Discounted	1.6	C3																															
409		Land at Latchetts Mead, Green Lane	Discounted	1.0	C3																															
919		Riverside Nursery, Philpot Lane	Discounted	0.9	C3																															
835		Land East of Lovelands Lane	Discounted	0.4	C3																															
567		Princess Royal Barracks 1, Brunswick Road	Permitted	111	Mix																															
887		Land at Loen, St Catherines Road, Frimley Green	Deliverable	4.4	C2	10																														

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Ref	Sub area	Name	Status	Area (ha)	Type	# homes (C3)	AQMA	SRN	SPA	SSSI	SNCI	Ancient woodland	Priority habitat	TPO	Conservation area	Listed building	RPG	Locally listed	Archaeology	Flood zone	Town centre	Local centre	School	Train station	Bus stop	Nature reserve	Greenspace	IMD	Green Belt		
552	Frimley	Land at Frimhurst Farm, Deepcut Bridge Road	Developable	4.9	C3	65																									
757		Land north of Guildford Road	Developable	5.5	C3	21																									
920		The Grange, St Catherines Road	Developable	2.9	C3	17																									
846		Former Premier Site	Developable	0.4	C3	10																									
922		Ballydown, Lake Road	Developable	0.9	C3	5																									
504		Land North of Lake Road	Developable	0.5	C3	5																									
926		Land adj to Wykeham Park House, St Catherines Road	Developable	0.3	C3	5																									
375		East of St Catherine Rd, north of Lake Rd, west of Bellew Rd	Deliverable	30	SANG																										
923		Land East of St Cross Road & North of Lake Road	Growth scenarios	0.4	C3																										
836		Former Depot, Pricess Royal Barracks	Discounted	5.3	C3																										
906		Land at Guildford Road	Discounted	0.6	C3																										
378		51-57 Deepcut Bridge Road	Discounted	0.1	C3																										
907		Sir William Siemens Square, Frimley	Developable	3.1	C3	200																									
837		Former Playing Field Lane	Developable	0.6	C2	10																									

Ref	Sub area	Name	Status	Area (ha)	Type	# homes (C3)	AQMA	SRN	SPA	SSSI	SNCI	Ancient woodland	Priority habitat	TPO	Conservation area	Listed building	RPG	Locally listed	Archaeology	Flood zone	Town centre	Local centre	School	Train station	Bus stop	Nature reserve	Greenspace	IMD	Green Belt		
882		Land Rear of Parade	Developable	0.3	C3	5																									
830		Land at Pineridge, Old Bisley Road, Camberley	Discounted	102	C3																										
566		34 & 36 Station Road	Discounted	0.1	C3																										
557	Frimley Green	Land west of Sturt Road	Deliverable (permitted)	3.4	C3	160																									
329		251 Frimley Green Road	Developable	0.2	C3	17																									
512		SC Johnson, Frimley Green Road	Discounted	27	C3																										
299		Land at East Curve, Sturt Road	Discounted	1.5	C3																										
195		214-216 Frimley Green Road	Discounted	0.2	C3																										
908	Lightwater	103 - 109 Guildford Road	Deliverable	0.4	C3	17																									
909		Land South of Sundew Close, Guildford Road	Discounted	1.1	C3																										
910		Land Rear of 160 - 162 MacDonald Road	Discounted	0.8	C3																										
911		Land rear of 164 MadDonald Road	Discounted	0.2	C3																										
912	Mytchett	Land adjacent to Sherrard Way	Developable	4.0	C3	16																									
1000		10 Willow Close	Developable	0.5	C3	7																									

Ref	Sub area	Name	Status	Area (ha)	Type	# homes (C3)	AQMA	SRN	SPA	SSSI	SNCI	Ancient woodland	Priority habitat	TPO	Conservation area	Listed building	RPG	Locally listed	Archaeology	Flood zone	Town centre	Local centre	School	Train station	Bus stop	Nature reserve	Greenspace	IMD	Green Belt							
178	West End	Land east of Benner Lane (partial Housing Reserve Site)	Developable	7.6	C3	73																														
840		Land at 32 Benner lane	Developable	0.4	C3	10																														
153		Land South of Fenns Lane	Developable + Growth scenarios	6.4	C3	7																														
799		Land North of Old House Lane	Developable + Growth scenarios	1.8	C3	6																														
813		Land at Oak Farm House	Growth scenarios	14	C3																															
913		Land South of Beldam Bridge Road	Growth scenarios	2.5	C3																															
374		Land at Pankhurst Farm	Discounted	9.5	C3																															
914	West End	B/n Little Down & Whitedown Cottage, Bagshot Rd	Discounted	1.6	C3																															
816		Gazes, Old House Lane, Bisle	Discounted	0.3	C3																															
177	Windlesham	Housing Reserve Site, Heathpark Drive	Permitted	8.1	C3																															
1004		St Margarets Cottage & The Ferns, Woodlands Lane	Deliverable	0.9	C3	20																														
844		Land at Chamless	Developable	0.8	C3	9																														
834		Broadway Green Farm, Broadway Road	Developable	2.8	C3	7																														
809		Land East of Snows Ride	Growth scenarios	16	C3																															

Ref	Sub area	Name	Status	Area (ha)	Type	# homes (C3)	AQMA	SRN	SPA	SSSI	SNCI	Ancient woodland	Priority habitat	TPO	Conservation area	Listed building	RPG	Locally listed	Archaeology	Flood zone	Town centre	Local centre	School	Train station	Bus stop	Nature reserve	Greenspace	IMD	Green Belt	
609		Land north Reserve Site, Heathpark Drive	Growth scenarios	2.8	C3		Green	Green	Red	Green	Green	Green	Green	Green	Red	Green				Green		Green	Red	Yellow	Yellow		Red		Yellow	
915		Land rear of 1-31 Broadley Green	Growth scenarios	0.6	C3		Green		Yellow	Green	Green	Green	Green	Green	Red	Green				Green		Green	Red	Green				Orange		Yellow
445		Windlesham Garden Centre, London Road	Discounted	4.1	C3		Green		Yellow	Green	Green	Green	Green	Green	Green	Green				Green		Red	Yellow	Green			Red		Yellow	
276		Land East of Snows Ride and Hatton Hill	Discounted	3.2	C3		Green		Yellow	Green	Green	Green	Green	Green	Red	Green				Green		Red	Green	Yellow			Red		Yellow	
1005		Meadow Farm, Kennel Lane	Discounted	2.6	C3		Green		Yellow	Green	Green	Green	Green	Green	Red	Red		Yellow		Green		Green	Green	Green			Green		Yellow	
765		Windlesham South Garage, London Road	Discounted	0.3	C3		Green		Yellow	Green	Green	Green	Green	Green	Green	Green				Green		Red	Green	Yellow			Red		Yellow	

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Surrey Heath Borough Council

Executive

28th February 2022

Surrey Heath Local Development Scheme 2022 – 2025

Portfolio Holder:	Cllr Adrian Page – Planning and People
Strategic Director/Head of Service	Bob Watson/Gavin Chinniah
Report Author:	Jane Reeves – Planning Policy Manager
Key Decision:	No
Wards Affected:	Whole Borough

1. Summary and purpose

- 1.1 Local Authorities are required to produce, and keep up to date, a Local Development Scheme (LDS) which sets out the future planning documents the Council will be producing within a three-year period and the timescales and key milestones for their preparation. The Council last published an LDS in 2021 covering the period to 2024.
- 1.2 The proposed LDS attached at Annex 1 focuses on the preparation of a new Surrey Heath Local Plan and sets out the milestones and timescales to adoption in 2023. It replaces the current LDS which covers the period 2021 – 2024. The purpose of this report is to seek Executive agreement to the revised Local Plan preparation timetable.
- 1.3 The key stages and dates for preparation are set out in the following table:

Local Plan preparation Stage	Date
Consultation on Issues and Preferred Options	June - July 2018
Consultation on a Draft Local Plan (Regulation 18) (THIS STAGE)	March – May 2022
Consultation on Gypsy and Traveller allocations	Summer 2022
Consultation on a Pre-Submission Local Plan (Regulation 19)	January – February 2023
Submission to the Secretary of State for Examination	June 2023
Inspector's Report ¹	October 2023
Adoption	December 2023

¹ Inspectors Report and adoption dependent on the Planning Inspectorate and the timetable for the Local Plan Examination and the need for consultation on any proposed Modifications to the Plan

2. Recommendation

- 2.1 The Executive is advised to RESOLVE that:the Surrey Heath Local Development Scheme (LDS) attached at Annex 1, covering the period 2022 – 2025 be agreed and published on the website.

3. Background and Supporting Information

- 3.1 The new Surrey Heath Local Plan, once adopted, will replace current planning policies in the saved Local Plan, 2000, the Core Strategy and Development Management Policies Document and the Camberley Town Centre Area Action Plan. It will provide a robust and up-to-date planning framework for future development in the Borough.
- 3.2 The timetable set out in the LDS is based upon current planning policy and legislation. The need for a new LDS has arisen due to a delay in preparing the Draft Local Plan for consultation and hence changes to the Draft Plan consultation dates and subsequent stages are required. The delays have arisen due to the need to determine a robust spatial strategy as well as exploring additional mitigation options for the Thames Basin Heaths SPA and continued investigation of options for Gypsy and Traveller pitches.
- 3.3 The Government is proposing new planning reforms which, if introduced in the next eighteen months, may impact upon the Local Plan scope and timetable. Other risk factors are set out later in this Report and Section 7 of the LDS.

4. Reasons for Recommendation

- 4.1 The LDS focus is on the production of the new Surrey Heath Local Plan 2019 - 2038. The Government has set a requirement for up-to-date Local Plans to be in place by December 2023 or risk Government intervention in the plan making process.
- 4.2 A Local Plan Issues and Options consultation took place in summer 2018. The revised LDS timetable reflects delays to the preparation of a draft Local Plan for consultation and subsequent changes to the remainder of the timetable. Consultation on the proposed Submission Local Plan is now anticipated in early 2023 with adoption in December 2023.
- 4.3 The LDS also identifies the preparation of the following two Supplementary Planning Documents which will be prepared to support policies in the new Local Plan. Timetables for these will be placed on the website once these are drafted:
- Parking Standards SPD
 - Climate Change and Green Infrastructure SPD

- 4.4 A draft LDS was considered and supported by the Local Plan Working Group in January 2022.

5. Proposal and Alternative Options

5.1 The available options for the Executive to consider are:

- i. to approve the LDS as set out in Annex 1 of this report; or
- ii. to approve the LDS as set out in Annex 1 of this report with changes; or
- iii. to not agree the LDS as set out in Annex 1 of this report.

6. Contribution to the Council's Five Year Strategy

6.1 The LDS sets out a timetable for the preparation of the Local Plan which once produced will help to deliver on the following themes:

- i. **Environment** - enhance and improve access to the Borough's cherished green spaces and natural environments for the enjoyment of generations to come, balancing our commitments to housing delivery and economic growth.
- ii. **Environment** – tackle Climate Change, working with communities and partners.
- iii. **Health & Quality of Life** – provide infrastructure that would support our ambition to ensure everyone can access a safe, quality home to meet their needs.
- iv. **Economy** – invest in our towns, villages and communities, supporting our existing businesses and attracting new ones.
- v. **Economy** – work with partners to improve to the Borough's infrastructure.
- vi. **Effective & Responsive Council** – advocate on behalf of our community on issues outside our direct control.

7. Resource Implications

7.1 There are no immediate resource implications arising beyond those allowed for within current budgets. Resources will be needed in the following two financial years to deliver the Local Plan and these will be sought through the usual budget setting process.

8. Section 151 Officer Comments

8.1 There are no additional budgetary implications of this report outside of existing budgets.

9. Legal and Governance Issues

9.1 The preparation of a Local Development Scheme and Local Plan are statutory requirements of the Planning & Compulsory Purchase Act 2004 (as amended by the Localism Act 2011) and Town and Country Planning (Local Planning) (England) Regulations 2012. The Local Plan must be prepared in line with relevant legislation as well as having regard to national planning policy and guidance. The Secretary of State can intervene to put a new LDS in place where the current one is out of date.

10. Monitoring Officer Comments

10.1 No matters arising.

11. Other Considerations and Impacts

11.1 No matters arising.

12. Environment and Climate Change

12.1 The LDS sets out a timetable for the production of the Local Plan and in itself does not give rise to any impact upon environmental matters or climate change.

13. Equalities and Human Rights

13.1 No matters arising.

14. Risk Management

14.1 The LDS identifies the risks to meeting the Local Plan milestones and sets out some mitigation to each risk. Of note are that the Draft Local Plan does not yet include sufficient Gypsy and Traveller sites to meet the needs identified in the technical background evidence and a further consultation on this issue will therefore be needed in the summer 2022. In addition, the date for submission of the Plan to the Secretary of State for independent examination is now later than previously proposed. The timetable for Examination and the receipt of the Inspector's Report prior to the adoption of the Plan by December 2023 will be challenging, although this part of the process will be the responsibility of the Planning Inspectorate rather than the Council.

14.2 The Government is also proposing changes to planning policy and legislation although at this time the extent and exact timing of these is not known and will need to be monitored as the plan progresses.

15. Community Engagement

15.1 The LDS sets out the stages at which the Local Plan will be subject to consultation.

16. Annexes

16.1 Annex 1 – Draft Local Development Scheme 2022 – 2025

17. Background Papers

17.1 None.



Draft
Local Development Scheme
2022-2025

Foreword

This document rolls forward the Council's current Local Development Scheme (LDS) to identify the scope and timetable for the preparation of a new Surrey Heath Local Plan 2019 - 2038.

It covers the time period 2022 – 2025 although it also identifies work done before that time where appropriate.

This LDS was agreed by Executive on xxx.

This document was produced by the:
Planning Policy and Conservation Team
Regulatory Services
Surrey Heath Borough Council
Surrey Heath House
Knoll Road
CAMBERLEY
Surrey GU15 3HD

E-mail: planning.policy@surreyheath.gov.uk
Telephone Number 01276 70100

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1. Introduction

- 1.1 This Local Development Scheme (LDS) sets out Surrey Heath Borough Council's programme for preparing a new Local Plan. It outlines the Local Plan content and a timetable for each stage of the Local Plan preparation. The LDS also identifies other documents that are to be prepared by the Council to support the Local Plan.
- 1.2 This Local Development Scheme updates the previous LDS which covered the period 2021 to 2024.
- 1.3 The Local Plan is accompanied by other planning documents including:
- Supplementary Planning Documents (SPD's)
 - Statement of Community Involvement (SCI)
 - Authority Monitoring Report (AMR)
- 1.4 Throughout this document a number of abbreviations are used in place of the full terminology. These are set out in a Glossary of Terms which can be found at the back of this document.
- 1.5 The timetable for preparing the Surrey Heath Local Plan is based on current legislation and national planning policy and guidance. However, in August 2020 the Government published a Planning White Paper seeking views on radical reforms to the planning system and in 2021 announced proposals for a Planning Bill. At the current time there is no clarity as to what planning reforms will be taken forward, or of the timetable for such reforms. In line with Government advice, the Council is therefore progressing with the Local Plan under current legislation until such time as it can no longer do so or it is not prudent to do so having regard to any transitional arrangements.
- 1.6 Further information on the Local Plan, supporting evidence and other related documents can be viewed on the Council's website at <https://www.surreyheath.gov.uk/residents/planning/planning-policy>

2. The Purpose and Content of the Local Development Scheme

- 2.1 The Planning and Compulsory Purchase Act 2004 (as amended) states that Local Planning Authorities must prepare and maintain a scheme to be known as the Local Development Scheme.² The scheme is expected to specify which documents are to be development plan documents (DPD's), the geographic areas the DPD's will cover and a timetable for their preparation and review of these documents.³
- 2.2 The LDS has 3 main purposes. These are:
- To inform the public and stakeholders of the policy documents that will make up the Local Plan and the timescales in which they can expect these documents to be prepared;
 - To establish and reflect Council priorities and to enable work-programmes to be set for preparation of the documents; and
 - To set a timetable for the review of the documents once they have been prepared.

3. The Development Plan for Surrey Heath

- 3.1 The current Development Plan for the Borough, i.e. documents containing adopted planning policies is made up of the following:
- Core Strategy and Development Management Policies Development Plan Document 2011-2028, 2012;
 - Camberley Town Centre Area Action Plan (2014);
 - Saved Policies from the 2000 Surrey Heath Local Plan;
 - Saved Policy NRM6 of the South East Plan which relates to development affecting the Thames Basin Heaths Special Protection Area; and,
 - Windlesham Neighbourhood Plan, 'made' on 12 June 2019.
- 3.2 The Council is preparing a single new Local Plan to cover the period to 2038. This Local Plan will set out strategic policies on issues such as housing and employment, allocation of sites for development and Development Management policies. This Plan will, on adoption, replace all of the current Development Plan policies, except any contained in Neighbourhood Plans.
- 3.3 Surrey Heath currently has one 'made' Neighbourhood Plan covering the Parish of Windlesham. As set out above, this Plan also forms part of the Development Plan for the borough. Two further areas are designated as Neighbourhood Plan Areas. Further information on neighbourhood planning in the Borough can be found at <https://www.surreyheath.gov.uk/residents/planning/planning-policy/neighbourhood-planning> .

² S15 (1) of the Planning & Planning and Compulsory Purchase Act 2004 (as amended)

³ S15 (2) of the Planning & Planning and Compulsory Purchase Act 2004 (as amended)

4. Other relevant planning documents

4.1 The existing Development Plan is supported by a number of Supplementary Planning Documents (SPD). These set out further information as to how policies will be implemented and the expectations from applicants in meeting policy requirements. The following SPD's have been adopted by the Council and will continue to be a significant material consideration in determining planning applications unless they are withdrawn or replaced:

- Deepcut SPD
- Developer Contributions SPD
- Infrastructure Delivery SPD
- Lightwater Village Design statement
- Local Heritage Assets SPD
- Thames Basin Heaths SPA Avoidance Strategy SPD
- Camberley Town Centre Masterplan and Public Realm SPD
- Residential Design Guide SPD
- Western Urban Area Character SPD
- Yorktown Landscape Strategy SPD
- West End Village Design Statement SPD

These documents will be carried forward to support the future Local Plan. They can be viewed at <https://www.surreyheath.gov.uk/residents/planning/planning-policy/supplementary-planning-documents>

4.2 Two further SPDs have currently been identified to be prepared during the LDS period 2022 – 2025. These are:

Parking Standards SPD

This will set out standards for vehicular and cycle parking across the Borough as well as the expectation for provision of electric vehicle charging points.

Climate Change and Green Infrastructure SPD

This will set out detailed guidance on how new development can contribute to climate change mitigation and adaptation, deliver a Green Infrastructure Strategy and provide further guidance for the delivery of biodiversity net gain.

4.3 Information on the timetables for these SPDs and on any additional SPDs will be made available on the above webpage when they are available.

4.4 In preparing the Local Plan the Council must prepare a Sustainability Appraisal incorporating a Strategic Environmental Assessment (SA/SEA) and a Habitats Regulation Assessment (HRA)⁴ as well as appropriate evidence to support the content of the Local Plan.

4.5 The Council must also produce an annual Authority Monitoring Report which includes information on how the policies in the Local Plan are being delivered.

⁴ See Glossary for further detail on these assessments

5. **Statement of Community Involvement**

- 5.1 The Statement of Community Involvement (SCI) sets out how the Council will consult the local community and other interested parties on developing planning policy for Surrey Heath, and on significant planning applications. The current SCI can be viewed at <https://www.surreyheath.gov.uk/SCI>.

6. **The Timetable for the Preparation of the Local Plan**

- 6.1 **Table 1** sets out more detail on the scope of the Local Plan and the timetable for key stages of production up to adoption in 2023.
- 6.2 The Adopted Policies Map showing the policy and site allocation boundaries will be revised as necessary upon the adoption of the Local Plan.

Table 1 Local Plan Summary Programme and Timetable 2022 – 2025

Document Profile	Surrey Heath Local Plan 2019 - 2038
Coverage Status	Borough Wide Development Plan Document (DPD)
Subject	<p>The Local Plan will set out the Council’s approach to strategic policies, land allocations and detailed policies to help deliver the vision and objectives for the Borough; including;</p> <ul style="list-style-type: none">• Outlining the requirement for new housing/economic land across the Borough and how these requirements will be met;• Allocating sites for housing;• Specific place based policies;• Policies relating to provision of affordable housing, specialist housing and Gypsy and Traveller and Travelling Showpeople accommodation;• Green Belt policies;• Site specific policies for employment sites;• Boundaries of retail centres, and a strategy for Camberley Town Centre;• Infrastructure provision;• Policies on green infrastructure and nature conservation;• Policies on the historic environment.

Timetable:

Local Plan Stage	Details	Date
Consultation on Issues and Options and Preferred Approach; and Revised Scoping Report and Interim Sustainability Appraisal/Strategic Environmental Assessment	This is an early consultation stage seeking views on broad policy approaches and accompanied by an Interim Sustainability Appraisal.	June – July 2018
Consultation on a Draft Plan and Draft Sustainability Appraisal/Strategic Environmental Assessment (Regulation 18)	This is an early consultation stage seeking views on draft policies and site allocations and accompanied by an updated Interim Sustainability Appraisal and supporting evidence.	March – May 2022
Consultation on Gypsy and Traveller allocations	A specific consultation on potential site allocations to meet the needs of Gypsies and Travellers over the Plan period.	Summer 2022
Consultation on a Pre-Submission Plan (statutory 6 weeks) and Final Sustainability Appraisal/Strategic Environmental Assessment (Regulation 19)	The Council publishes its 'final' version of the Plan that it intends to submit for Examination. Updated/additional supporting evidence including a Sustainability Appraisal Report and Habitat Regulation Assessment is also published.	January – February 2023
Submission of the Plan and supporting evidence to the Secretary of State for Examination (Regulation 22)	The Council sends the Plan, the evidence base and any representations received from the consultation above to the Secretary of State for independent examination. The Plan will be assessed to see if it is legally compliant and meets tests of 'soundness' set out in national policy ⁵ .	June 2023
Examination Hearing sessions (subject to Inspector availability)	The Examination will usually include public hearing sessions run by the Local Plan Inspector and based around matters and questions set by the Inspector.	August 2023
Inspector's Report (estimate – depends for example, on complexity of the Examination and the need for consultation on Plan Modifications)	The Inspector will issue a written report recommending modifications to the Local Plan.	October 2023
Local Plan Adoption	The Council adopts the Plan as part of the Surrey Heath Development Plan for the purposes of determining planning applications ⁶ .	December 2023

⁵ See para 35 of the National Planning Policy Framework 2021 <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁶ This date is dependent upon the need to do any further consultation on Modifications to the Local Plan (prior to the Inspectors Report), and on receipt of the Inspectors Report.

7. Programme Management and Responsibilities

- 7.1 The scope and timetable for production of the Local Plan is set out in Table 1. Any essential adjustments to the programme will be made as part of the next review of the LDS.
- 7.2 The Local Plan is a key corporate project and along with other key corporate projects is monitored quarterly through the Councils internal performance monitoring systems.

Council Procedures and Reporting Protocols

- 7.3 All decisions of the Executive are subject to call in by Scrutiny Committee. The Local Plan will be reported to Full Council for approval as Policy Documents of the Council at the Submission and Adoption stages.

Risk Assessment

- 7.4 The main areas of risk to the proposed programme are considered to be from the following:
- Staff Changes – the loss of any member of the Policy team is a risk to the overall timetable in that local and technical knowledge is lost with that staff member, including in terms of work undertaken so far on the Local Plan as well as potential gaps in resources in the time it takes to recruit replacement staff.
 - Project Management –Whilst there is a high level of expertise within the Policy Team there are some supporting evidence studies that require the use of consultants and input from other agencies such as Surrey County Council. Early procurement and good project management will be required to meet the timetable, however, resources in other agencies that are critical to some studies such as the Transport Assessment are outside the control of the Council.
 - Thames Basin Heaths Special Protection Area (SPA) – the Council must ensure that any long term strategy does not have a significant effect on the integrity of the SPA. The need for agreement with third parties and the need for sufficient mitigation through the provision of Suitable Alternative Natural Greenspace (SANG) to ensure that housing can be delivered will continue to be a risk.
 - Delivery of Gypsy and Traveller and Travelling Showpeople Accommodation – finding acceptable and deliverable sites to meet future needs for pitches for Gypsies and Travellers and plots for Travelling Showpeople is potentially a risk to meeting the Local Plan timetable.

- Changes to planning legislation and guidance – the Government has set out its intention to reform the planning process including changes to the way in which local plans are prepared. The timetable for introducing these reforms, and their exact nature is not yet known so it is possible that future changes will impact on the timetable set out in this LDS.
- In many instances the delivery of the long term planning strategy is by other responsible organisations. Delivery may be affected by a range of different factors. The Council will work closely with delivery agencies through the preparation of the Local Plan documents.

7.5 In addition to the above, the long-term impact of Covid-19 on the way in which consultations can be carried out and on other elements of the Local Plan preparation process continue to have potential implications at the time of preparing this LDS.

Monitoring and Review

- 7.6 The LDS will be reviewed through the annual Authority Monitoring Report (AMR) which will be produced to the year ending 31st March. The AMR includes:
- Progress on plan preparation milestones;
 - Information on the extent to which policies within the Development Plan are being achieved against key indicators and targets;
 - A recommendation as to whether any policies need reviewing.

Glossary of Terms

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

AMR	Authority Monitoring Report. An annual report which includes an update of how Local Plan policies are being delivered.
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.
CS&DMP DPD	Core Strategy & Development Management Policies DPD. The Council's current Local Plan and is a Development Plan 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.
SA/SEA	Sustainability Appraisal incorporating a Strategic Environmental Assessment. A Sustainability Appraisal (SA) is a tool used to appraise planning policy documents in order to promote sustainable development. Social, environmental and economic aspects are all taken into consideration. Sustainability Appraisal (SA) is a compulsory requirement under the 2004 Planning and Compulsory Purchase Act 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.
SPD	Supplementary Planning Document These are documents that provide further information and detail to the policies within the Local Plan and how they can be met.

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Surrey Heath Borough Council Executive

28 February 2022

Review of Parking Fees and Charges

Portfolio Holder:	Business & Transformation - Cllr Colin Dougan
Lead Officer:	Nick Steevens
Report Author:	Eugene Leal
Key Decision:	Yes
Wards Affected:	All

Summary and Purpose

To reconsider the decision of 25 January 2022 regarding Car Parking Tariffs (minute 87/E refers) following the consideration of call-in requests by the Performance & Finance Scrutiny Committee at its meeting on 17 February 2022.

Recommendation

The Executive is advised to consider the recommendations of the Performance & Finance Scrutiny Committee and determine whether to amend its decision of 25 January 2022.

1. Background

- 1.1. At its meeting on 25 January 2022 the Executive considered a report reviewing car parking tariffs and resolved that:
 - (i) car parking tariff changes, as set out in Annex 1 to the agenda report, be agreed to come into effect as soon as the statutory Traffic Regulatory Order process is complete and after review and consideration of any feedback received;
 - (ii) pay and display parking tariffs be introduced at Wharf Road car park, Frimley Green once the statutory Traffic Regulatory Order process is complete and after review and consideration of any feedback received;
 - (iii) the temporary NHS/Carers permit be extended until 1 May 2022;
 - (iv) the RingGo convenience fees be passed on to the customer;
 - (v) Parking Services investigate incentives to encourage greater use of zero emission vehicles;

- (vi) charging for the first two hours of parking in Knoll Road car park be reinstated as the public realm works in the High Street have now been completed. This will follow a statutory 3 week notice process, coming into effect on Monday 27 February 2022;
- (vii) the Parking Subsidy Season Ticket for low paid workers permit be retained as part of the revised tariffs; and
- (viii) the position in respect of Deepcut Car Park be reviewed should circumstances change.

1.2. The decision was subsequently called-in by a number of councillors. The Call-in requests can be viewed in the Performance & Finance Scrutiny Committee agenda for 17 February 2022:

<https://surreyheath.moderngov.co.uk/ieListDocuments.aspx?CId=309&MId=3888&Ver=4>

1.3. The minutes of the Performance & Finance Scrutiny Committee meeting on 17 February 2022, which summarise the discussions and recommendations of the Scrutiny Committee can be viewed at Annex E to this report (to follow).

1.4. The supporting information provided to the Executive in January has been reproduced in paragraphs 3 to 11 and annexes A-C, below.

2. Proposal and Alternative Options

2.1. The Executive can

- a. Agree the recommendations of the Performance & Finance Scrutiny Committee as set out in Annex E;
- b. Agree some but not all of the Scrutiny Committee's recommendations; or
- c. Reconfirm its original decision.

3. Supporting Information

3.1. The Council's parking service operates 17 off-street car parks across the borough's town and village centres to meet economic and community need. Currently only 8 of these charge for parking which means that more than half of these car parks are currently provided for free. Parking charges help pay for the costs of operating car parks and the capital investment required to maintain and improve them. In popular car parks charges also help encourage churn, which means that customers are more likely to find a parking space available for them when they need one.

3.2. Parking tariffs in the two Council operated multi-story car parks have remained unchanged since 2014 and in the borough wide pay and display car parks since 2009. This means that while costs of operating the car parks have continued to increase over this period, income has fallen significantly in real terms.

3.3. The costs of running our car parks has increased each year. The Retail Price Index (RPI) increases from the date of the last review of charges are as follows:

Main Square car park	23 June 2014	CPI 11%	RPI 23%
Knoll Road car park	23 June 2014	CPI 11%	RPI 23%
Yorktown car park	1 April 2010	CPI 25%	RPI 42%
Surrey Heath House	1 April 2010	CPI 25%	RPI 42%
Borough wide P&D car parks	1 October 2009	CPI 28%	RPI 46%

3.4. RPI is a measure of consumer inflation which considers the changes in the retail prices of a basket of goods and services, and reflects the impact of inflation on the spending power of residents and the Council itself. This is considered a more appropriate measure as it is used by the Government for a range of transport related expenditure including road tax and train ticket pricing. However RPI can only ever be a proxy for the true costs of running car parks, and some of the costs, including capital costs and materials, have been increasing significantly above RPI in recent years.

3.5. The Council relies on the income from parking charges to pay for the costs of providing car parks, including business rates, cleaning, equipment, repairs and maintenance. Parking income also helps pay for a range of other essential services that residents rely on including refuse collection, street cleaning and grass cutting.

3.6. It is important to note that for the majority of Council car parks, the income from car parking charges is insufficient each year, to meet the operational costs of providing those car parks. This means that every year the Council has had to provide a subsidy to keep these car parks operational. This is detailed in Annex C.

3.7. Information about the parking charges in neighbouring town and village centres is set out in Annex B. This is helpful in ensuring that the proposed changes in parking tariffs remain broadly competitive with other areas.

4. Principles

4.1. The following four high level principles are proposed to assist with determining the right level of parking charges in Council car parks:

Fair and reasonable charges that reflect customer needs	Each car park managed by the Council should generate sufficient income to cover its operational costs to support its long-term viability and keep pace with the inflationary costs of running car parks. Each car park should remain competitive with neighbouring areas and the reflect different patterns of use (eg shopping, commuter, etc). The total income collected across all car parks will remain
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	at or below pre-pandemic levels in real terms.
Safe and well maintained car parking facilities	Car parking income will fund the operation of the car parks including cleaning, as well as help provide a programme of repairs and maintenance and respond to resident priorities regarding safety including lighting and security measures and help support the introduction of electric charging points for public use
Responding to Climate Change	Where ever possible car parking charges will encourage appropriate levels of churn to ensure parking spaces are available to customers at the point they need them, minimising traffic congestion and queuing and idling vehicles or inconsiderate parking elsewhere.
Consistent and easy to follow charging structure	Straightforward and easy to follow tariffs consistency applied across similar car parks and tariff structures in Surrey Heath.

5. Detailed Proposals

Knoll Road Temporary Free Parking Camberley Town Centre

- 5.1. The temporary free parking at Knoll Road was introduced in August 2020 to support the town during the High Street redevelopment works and was extended to 2 hours free until January 2021, when the Public Realm work was expected to be completed. The full scope of the Public Realm work was completed in October 2021, therefore the 2 hour free parking should cease.

Camberley Town Centre Car Parks

- 5.2. The parking fees in Camberley town centre were last increased in June 2014 following the installation of the new multi-storey car park control and management system. This system needs to be replaced by June 2024 and work is starting to investigate options for a replacement system.
- 5.3. The proposal set out in this paper is for an increase of 20p per hour in these car parks, for example a £1.00 tariff in Knoll Road would become £1.20. This is below the RPI rate of 23%. The additional income generated will support the high level of usage and the associated cleaning and maintenance expected by our customers and help support the business case for future capital funding of these car parks.

Borough wide Pay and Display Car Parks

- 5.4. Drawing on local consultation in previous years, the Council has a good understanding of how these carparks are used and what local facilities are being accessed by those visiting each of these car parks. Details on this are set out below.
- 5.5. Bagshot car park, has 95 spaces and attracts over 79,000 customers per annum, Monday to Friday. This car park is located behind the co-op in Bagshot Square and provides parking for retail and businesses in Bagshot village centre.
- 5.6. Burrell Road car park, Frimley, 60 spaces and attracts over 53,000 customers per annum, Monday to Friday. This car park is located north of Frimley High Street, towards its southern end, and provides parking for retail and businesses in Frimley High Street as well as patients at the Station Road Surgery.
- 5.7. Chobham car park, Chobham has 96 spaces and attracts over 87,000 customers per annum, Monday to Friday. This car park is located behind the saddlery shop on Chobham High Street and provides parking for retail and businesses in Chobham High Street, for visitors to Chobham SANGS and for parents on the school run for St Lawrence C of E Primary School.
- 5.8. Watchetts Road car park, Camberley has 36 spaces and attracts over 36,000 customers per annum, Monday to Friday. This car park is located behind No 109 Frimley Road, Camberley and provides parking for retail and businesses along Frimley Road and for parents on the school run for South Camberley Junior Campus.
- 5.9. Yorktown car park, Camberley has 137 spaces and attracts 3,500 customers per annum. This car park located on Sullivan Road, Camberley at the north end of Frimley Road. Yorktown car park provides off-street parking for retail and businesses on Frimley Road and A30 London Road as well as residents who have limited off-street parking.
- 5.10. Yorktown car park already has charges that are broadly in line with what is proposed for the other borough-wide pay and display car parks and supports residents and business needs by already providing adequate churn. It is therefore proposed to maintain the current tariff structure and review these again when the Executive considers appropriate.
- 5.11. Bagshot, Chobham, Burrell Road, Frimley, and Watchetts Road car parks all currently run at a significant loss. Free parking for stays up to 1 hour will be retained to enable pop-in visits to our local retail centres and provide free parking for parents on the school run. Beyond the free first hour, the proposed tariffs for these car parks will remain significantly lower than the two Town Centre Car Parks for example a £1 charge for up to 2 hours, compared with £1.90 in Knoll Road, and £2.20 in Main Square. The proposed introduction of weekend parking charges in these car parks will also help ensure that each car park is more self-sustaining, able to contribute

more to their own maintenance and help support future capital investment in the parking infrastructure.

- 5.12. The Parking Subsidy Season Ticket will remain available to low paid workers using the borough wide pay and display car parks, ensuring affordable parking. Also, the annual parking season ticket, which can be paid for monthly, offers all day parking at a significant discount.

Deepcut Car Park

- 5.13. The Council has further explored the cost-benefit to residents of introducing a residents permits at Deepcut car park. This was originally considered to enable local residents to have overnight parking in this car park and address the risk that the available spaces may be taken up instead by nearby businesses. After further analysis, this risk has been deemed low, and as a result it will not be necessary to bring forward residents permits for Deepcut Car Park at this time. The position will be reviewed should circumstances change and the Council receives requests from local residents for this arrangement.

Wharf Road Car Park

- 5.14. Wharf Road, Frimley Green has 25 spaces and attracts approximately 14,000 customers per annum and serves the local businesses on Frimley Road. The car park is oversubscribed with lots of commuter parking. This means that parking for customers during the day is often not available and there is fair amount of parking outside of the bay markings, sometimes impeding other customers.
- 5.15. Introducing parking charges in Wharf Road car park, Frimley Green with free parking for stays up to 1 hour will encourage greater turnover of spaces and deter all day parking, while providing in additional income to ensure this car park contributes to the maintenance and capital investment to ensure our car parks meet customer expectations. The parking tariffs will be the same as those on Bagshot, Burrell Road, Frimley, Chobham and Watchetts Road car parks
- 5.16. The introduction of charges will reduce all day parking which will help ensure there are spaces available to shoppers at all times. At present, the car park is often full and customers either have to park and obstruct the car park, thereby risking a penalty charge notice, find a space on-street or shop elsewhere. This will reduce the unnecessary additional driving associated with finding an on-street space and reduce vehicle emissions in the local area.
- 5.17. For the remaining 8 car parks that have no charges in place, and that do not attract as high demand for parking, the intention is to leave them as free car parks at this time.

Extending temporary NHS/Carers Permits

5.18. The Council introduced temporary NHS /Carers permits in April 2020 in line with Government advice. While the Government withdrew the need for these permits in June 2021 the Council has continued this arrangement for a further 6 months. As the NHS staff and carers face another challenging winter, extending the current scheme until 1 May 2022 would provide further support to this group of customers. At present there are 81 NHS/Carer permit holders.

RingGo convenience charges

5.19. RingGo is a cashless payment system that customers in some pay and display car parks can choose to use to pay for their parking. There is a standard fee for using the RingGo service, currently 20p per transaction. When RingGo was introduced in 2013 for the Arena car park this cost was absorbed by the Council. RingGo also offer optional text services for their customers to use, which have also been paid for by the council.

5.20. The RingGo cashless payment system has been extended to Yorktown car park, Watchetts Road car park and Surrey Heath House car park. This a versatile and convenient service and the costs of which are to be borne by those that choose to use the service.

Potential impact of changes

5.21. The removal of the temporary 2 hour free parking in Knoll Road car park now that the public realm works have been completed will generate an additional £44,000 net income, based on the current tariffs of £1.00 for stays up to 1 hour and £1.50 for stays up to 2 hours and the associated income generated before these temporary arrangements were introduced. This assessment is based on analysis of both historic income levels before the temporary change and current usage levels.

5.22. The proposed increase in parking fees and charges across all the car parks set out in this report is likely to result in an additional £290,000 net income, which includes the £44,000 above. A 5% adjustment has been accounted for which is intended to take into account any behaviour change that may arise, including customers choosing to use alternative methods of travel, such as walking, cycling, e-cycling and bus.

5.23. The net contribution Parking Services provides to the Council's General Fund has been falling as the costs of operating the car parks have been increasing year on year while income has been reducing. The additional income generated by these proposals will help the Council reduce the deficit on car parking income in the budget and help support future capital investment.

5.24. Major capital investments in our car parks in recent years has included:

Financial Year	Car Park	Description of work	Cost
2014/15	Main Square	Resurface level 4	£148,453
2014/15	Main Square	Refurbish 3 x lifts	£210,423

2014/15	Main Square and Knoll Road	Install new car park control system	£187,228
2016/17	Main Square	Resurface level 5	£187,446
2017/18	Knoll Road	Refurbish Lift No 1	£65,842
2018/19	Main Square	Resurface levels 1-3	£346,932
2018/19	Main Square	Install LED Lights	£152,080
2018/19	Main Square	Refurbish 3 x stairwells	£37,785
2020/21	Chobham	Overlay car park surface	£37,430
2020/21	Watchetts Road	Relay monoblock surface	£48,423
Total Spend since the last fee increase			£1,422,042

5.25. Passing on the user fees for RingGo will save circa £3,300 per annum at the current rate of use and will enable the RingGo service to be expanded to all pay and display car parks.

6. Reasons for Recommendation

6.1. Tariffs have not increased for a number of years and the proposed tariffs increases aim to make all car parks more financially viable with increases broadly in line with inflation.

6.2. Reducing the free parking and charging a small fee will help reduce the very short journeys that are undertaken by car that could be carried out on foot, cycle etc and increase revenue to assist with the maintenance and investment in our car parks, with the least inconvenience to customers and ensuring each car park contributes meaningfully towards its costs.

6.3. Wharf Road car park, Frimley Green is a small car park with 23 spaces, 2 disabled spaces that provides parking for all customers working and visiting Frimley Green. This car park is regularly oversubscribed, with a lot of all-day parking which reduces the available parking for customers wishing to access village businesses.

6.4. All council car parks are subject to Non-Domestic Rates, which for 2021/22 totalled £539,286, with additional costs for maintenance, daily cleaning, inspection, enforcement, car parking ticket machines, cash collection and staffing. The total costs for Parking Services in FY 20/21 £1,219,491. A breakdowns of the costs of the multi-storey car parks and pay and display car parks are shown at Annex C.

6.5. Even with the proposed increases, the cost of parking in Surrey Heath would remain competitive when benchmarked against similar local commercial centres and villages in other boroughs that charge for their parking (see Annex B).

6.6. Passing on the costs of using RingGo cashless payment system to those that use the facility will enable the system to be expanded across all pay and display car parks for the benefit of customers.

- 6.7. The Council will commit to exploring incentives to encourage the greater use of zero emission vehicles in its car parks.

7. Contribution to the Council's Five Year Strategy

- a. **Environment:** continuing to invest in cleaning and maintenance of the car parks. Helping to put car parks on a more financially sustainable footing to help support the introduction of electric vehicle charging bays and other improvements to infrastructure that support reduction in carbon and climate change.
- b. **Health & Quality of Life:** supporting the local community by ensuring that quality, convenient and safe parking is provided in our towns and villages.
- c. **Economy:** supporting the local economy by ensuring customers have access to quality facilities across the borough and paying customers have access to a car parking space when and where they need it.
- d. **Effective & Responsive Council:** Parking Services carries out regular consultations with the public to seek their views on how to improve our parking provision and we will continue to invest in new technology and maintenance to meet the requirements of our customers.

8. Resource Implications

- 8.1. If agreed, the proposals could increase revenue by up to circa £290,000 (allowing for a 5% drop in car park customers across the borough) which will help to ensure ongoing maintenance and future investment in our car parks including investment in expanding our electric vehicle charging infrastructure borough wide.
- 8.2. To amend the tariffs will require a Notice of Variation to be published in the local paper at a cost of approximately £1,200, depending on the size of the advert.
- 8.3. Where new tariffs and season tickets are proposed a notice must be published for 28 days advertising the change and the public will be able to comment or object. Following approval of any changes a further notice must be published advertising the making of the order. Together the costs would be £2,400.
- 8.4. **Section 151 Officer Comments:**
- 8.5. These proposals allow for continued investment in the Council's parking services and takes into account the rising costs of delivering the service. The additional income achieved will restore income towards existing budgeted levels, which would avoid placing additional budgetary strain on other services.

9. Legal and Governance Issues

9.1. Changes to parking tariffs require a Notice of Variation to be advertised in the local paper, on each car park and on line for a minimum period of 21 days in accordance with the Road Traffic Regulation Act 1984.

9.2. Introducing new charge and season tickets requires a Notice of Variation is to be advertised in the local paper, on each car park and on line for a minimum period of 28 days in accordance with the Road Traffic Regulation Act 1984 inviting comment or objection. Following approval a Notice of Making is to be advertised in the local paper, on each car park and on line informing the public that the regulations have changed in accordance with the Road Traffic Regulation Act 1984.

9.3. Monitoring Officer Comments:

None relating to this report.

10. Other Considerations and Impacts

10.1. Environment and Climate Change

- Car parks have an important role in helping tackle climate change, including ensuring parking spaces are available when needed to help avoid queuing and avoidable congestion, avoid extending journey time to find available parking spaces, avoid idling vehicles, and incentivise the switch to electric and other zero emission vehicles and public transport.
- In October 2019 the Council declared a Climate Emergency and pledged to become carbon neutral by 2030 across its own estate and operations and support the reduction in carbon emissions across the borough as a whole so that the borough could be net zero by 2050. .
- Department for Transport statistics show that in 2020 only 0.6% of licenced cars in the UK were fully electric zero emission vehicles. This is beginning to change as the Government has set a ban on the sale of petrol and diesel cars by 2030.
- The Council's Parking Service will be investigating options to encourage and incentivise the take-up and use of zero emission and fully electric vehicles as part of its climate change commitments.

10.2. Equalities and Human Rights

- Providing safe, accessible and financially sustainable car parks is key to ensuring that everyone in the community who needs to park their car is able to do so.

10.3. Risk Management

- There are some potential risks that could arise from changes in parking tariffs. These are explored below.
- Retaining car parks for the benefit of local residents and businesses is linked to their financial sustainability. The proposed changes will help contribute to the financial sustainability of the Council's car parks, reducing the level of subsidy that is required and protecting their future operation for the benefit of residents and businesses.
- Given the relatively small cost that car parking represents compared to the total increasing cost of running a vehicle (fuel, road tax, servicing, repairs, etc), and the trend of fewer car parking visits has been seen nationally in recent years due to changing in retail and working patterns, there is no evidence that the proposed charges will impact on footfall in our town and village centres or displace parking to nearby streets. The Council will maintain a close eye on parking visits and local footfall numbers, and will take appropriate steps to tackle any examples of inconsiderate parking both inside and outside its car parks through its parking enforcement team.
- The proposed changes in tariffs may impact on income generated due to changes in behaviour such as switching to other modes of transport or people choosing to walk for shorter journeys. Taking into account previous experience, a 5% allowance has been made in the analysis of income to take this into account. This will be kept under review and any significant variances will be reported back to the Executive through the existing budget monitoring arrangements.
- The one hour free parking in the borough-wide pay and display car parks will ensure that parents who need to park to drop off or pick up their children from a nearby school, or pop into the local shops or walk their dog in a local dog walking area, are able to do so and stay for a full hour without incurring any additional costs. However, this will require the Council to provide an on-going subsidy to these car parks.
- Those on low incomes who need to park regularly in order to access employment (for example working in a local shop) could be disproportionately impacted by changes in parking tariffs. However, the retention of the Council's subsidy for season tickets for low paid workers will significantly mitigate this risk.

11. Community Engagement

- 11.1. If approved, changes to parking tariffs require the council to publish statutory Notices of Variation in the local paper, physically at each car park and on the council website for a period of 21 days in accordance with the Road Traffic

Regulation Act 1984.

11.2. Subject to final approval the changes would then be publicised via official council media.

Annexes

Annex A: Proposed Car Parking Tariff Changes

Annex B: Benchmarking Tariffs Against Local Competitor and Comparator Towns and Village Centres

Annex C: Costs and Income of multi-storey and pay and display car parks.

Annex D: Equality Impact Assessment

Annex E: Minutes of the Performance & Finance Scrutiny Committee – 17 February 2022 (to follow)

Background Papers

Call-in requests - Annex A to agenda item 4

<https://surreyheath.moderngov.co.uk/ieListDocuments.aspx?CId=309&MId=3888&Ver=4>

Annex A Proposed Car Parking Tariff Changes

Knoll Road – Daily Fees – Removal of 2 hours free			
Duration	Customer p/a	Existing Tariff	Net Income
1 hour	19,537	£1.00	£16,000
2 hours	22,518	£1.50	£28,000
Income circa			£44,000

Town Centre Charges

Main Square car park – Daily Fees

Duration	Customer p/a	Existing Tariff	Proposed
2 hours	401,313	£1.80	£2.20
3 hours	48,859	£2.30	£2.90
4 hours	17,642	£3.50	£4.30
6 hours	8,923	£5.00	£6.20
10 hours	9,586	£7.00	£9.00
Evening	20,797	£2.00	£2.50
Sunday	65,691	£1.50	£2.00
Income (Net VAT)		£956,945	£1,187,843
		Increase in income	£230,898

Main Square – Season Tickets

Period	Customer p/a	Existing Tariff	Proposed
12 months	18	£995	£1,280
6 months	4	£575	£680
3 months	7	£290	£375
1 month	82	£84	£130
Resident overnight 12 month	25		£430
Resident overnight 1 month	300		£38
Income (Net VAT)		£24,273	£50,996
		Increase in income	£26,723

Knoll Road car park – Daily Fees

Duration	Customer p/a	Existing Tariff	Proposed
1 hour	19,537	£1.00	£1.20
2 hours	22,518	£1.50	£1.90
3 hours	6,025	£2.00	£2.60
4 hours	3,081	£3.00	£3.80
10 hours	12,449	£4.00	£5.00
Evening	2,469	£1.50	£2.00
Sunday	8,047	£1.50	£2.00
Income (Net VAT)		£116,814	£147,399
		Increase in income	£30,585

Knoll Road car park – Season Tickets			
Period	Customer p/a	Existing Tariff	Proposed
12 months	60	£825	£1,035
6 months	12	£475	£560
3 months	2	£240	£300
1 month	48		£105
Income (Net VAT)		£46,400	£62,050
		Increase in income	£15,650

Bagshot car park – Daily Fees

Duration	Customer p/a	Existing Tariff	Proposal
1 hour		FREE	FREE
2 hours	75,068	FREE	£1.00
3 hours	1,453	£0.40	£1.50
4 hours	956	£0.80	£2.00
5 hours	634	£1.20	£2.50
6 hours	171	£1.60	£3.00
7 hours	473	£2.00	£3.50
8 hours	32	£2.40	£4.00
All day	963	£2.50	£4.50
Income (Net VAT)		£4,842	£16,511
		Increase in income	£11,669
Saturday (same as Mon – Fri tariff)	15,852		£3,302
Sunday (Up to 1 hr free, 50p all day)	7,926		£330
Income (Net VAT)		Increase in income	£3,632

Expected change of customer behaviour

*90% 1 hour

*10% 2 hours

Bagshot car park – Season Tickets

Period	Customer p/a	Existing Tariff	Proposal
12 months	4	£375	£475
6 months		£310	£250
3 months		£160	£135
1 month	24	£32	£47
Income (Net VAT)		£1,890	£2,523
		Increase in income	£633

Heavily subsidised parking permit available for low paid workers (£10 per month)

Burrell Road car park – Daily Fees

Duration	Customer p/a	Existing Tariff	Proposal
1 hour		FREE	FREE

2 hours	49,317	FREE	£1.00
3 hours	1,373	£0.40	£1.50
4 hours	956	£0.80	£2.00
5 hours	585	£1.20	£2.50
6 hours	180	£1.60	£3.00
7 hours	603	£2.00	£3.50
8 hours	21	£2.40	£4.00
All day	354	£2.50	£4.50
Income (Net VAT)		£3,705	£12,244
		Increase in income	£8,540
Saturday (same as Mon – Fri tariff)	10,603		£2,449
Sunday (Up to 1 hr free, 50p all day)	5,301		£221
Income (Net VAT)		Increase in income	£2,670

Expected change of customer behaviour

*90% 1 hour

*10% 2 hours

Burrell Road car park – Season Tickets

Period	Customer p/a	Existing Tariff	Proposal
12 months	8	£375	£475
6 months		£310	£250
3 months		£160	£135
1 month	60	£32	£47
Income (Net VAT)		£4,100	£5,517
		Increase in income	£1,417

Heavily subsidised parking permit available for low paid workers (£10 per month)

Chobham car park – Daily Fees

Duration	Customer p/a	Existing Tariff	Proposal
1 hour		FREE	FREE
2 hours	74,807	FREE	£1.00
3 hours	5,403	£0.40	£1.50
4 hours	2,254	£0.80	£2.00
5 hours	1,080	£1.20	£2.50
6 hours	244	£1.60	£3.00
7 hours	1,716	£2.00	£3.50
8 hours	99	£2.40	£4.00
All day	1,669	£2.50	£4.50
Income (Net VAT)		£11,244	£31,198
		Increase in income	£19,954
Saturday (same as Mon – Fri tariff)	17,702		£6,240

Sunday (Up to 1 hr free, 50p all day)	8,851		£369
Income (Net VAT)		Increase in income	£6,608

Expected change of customer behaviour

*90% 1 hour
*10% 2 hours

Chobham car park – Season Tickets

Period	Customer p/a	Existing Tariff	Proposal
12 months	1	£375	£475
6 months		£310	£250
3 months		£160	£135
1 month	12	£32	£47
Income (Net VAT)		£633	£866
		Increase in income	£233

Heavily subsidised parking permit available for low paid workers (£10 per month)

Watchetts Road car park – Daily Fees

Duration	Customer p/a	Existing Tariff	Proposal
1 hour		FREE	FREE
2 hours	34,548	FREE	£1.00
3 hours	632	£0.40	£1.50
4 hours	368	£0.80	£2.00
5 hours	205	£1.20	£2.50
6 hours	26	£1.60	£3.00
7 hours	229	£2.00	£3.50
8 hours	25	£2.40	£4.00
All day	238	£2.50	£4.50
Income (Net VAT)		£1,623	£6,418
		Increase in income	£4,795
Saturday (same as Mon – Fri tariff)	7,179		£1,284
Sunday (Up to 1 hr free, 50p all day)	3,590		£150
Income (Net VAT)		Increase in income	£1,433

Change in customer behaviour in the first 2 hours of each visit:

*90% 1 hour
*10% 2 hours

Watchetts Road car park – Season Tickets

Period	Customer p/a	Existing Tariff	Proposal
12 months	2	£375	£475
6 months		£310	£250
3 months		£160	£135
**1 month	21	£32	£47
Income (Net VAT)		£1,185	£1,614
		Increase in income	£429

Heavily subsidised parking permit available for low paid workers (£10 per month)

York Town car park – Daily Fees

Duration	Customer p/a	Existing Tariff	Proposal
1 hour		£1.00	£1.00
2 hours	2,604	£1.00	£1.00
3 hours		£2.50	£2.50
4 hours		£2.50	£2.50
5 hours	192	£2.50	£2.50
6 hours		£3.00	£3.00
7 hours		£3.00	£3.00
8 hours		£3.00	£3.00
All day	741	£3.00	£3.00
Income (Net VAT)		£4,423	£4,423
		Increase in income	Nil
Saturday	707		£679
(same as Mon – Fri tariff)			
Sunday (Up to 1 hr free, 50p all day)	354		£15
Income (Net VAT)		Increase in income	£694

Change in customer behaviour in the first 2 hours of each visit:

*90% 1 hour

*10% 2 hours

Yorktown car park – Season Tickets

Period	Customer p/a	Existing Tariff	Proposal
12 months	4	£540	£540
6 months	2	£310	£310
3 months	18	£160	£160
1 month	119	£46	£46
Income (Net VAT)		£9,278	£9,278
		Increase in income	Nil

Heavily subsidised parking permit available for low paid workers (£10 per month)

Surrey Heath House car park – Daily Fees

Duration	Customer p/a	Existing Tariff	Proposed
2 hours	1,410	£1.20	£1.60
3 hours	588	£2.00	£2.60
4 hours	102	£2.80	£3.60
10 hours	150	£4.00	£5.00
Sunday/BH	876	£1.50	£2.00
Income (Net VAT)		£4,223	£5,545
		Increase in income	£1,322

Wharf Road car park – Daily Fees

Duration	Customer p/a	Existing Tariff	Proposal
1 hour		FREE	FREE
2 hours	11,750	FREE	£1.00
3 hours	251	FREE	£1.50
4 hours	106	FREE	£2.00
5 hours	35	FREE	£2.50
6 hours	26	FREE	£3.00
7 hours	30	FREE	£3.50
8 hours	5	FREE	£4.00
All day	1,840	FREE	£4.50
Income (Net VAT)		£0	£8,612
		Increase in income	£8,612
Saturday (same as Mon – Fri tariff)	2,466	£0	£1,722
Sunday (Up to 1 hr free, 50p all day)	1,233	£0	£51
Income (Net VAT)		Increase in income	£1,774

Change in customer behaviour in the first 2 hours of each visit:

*90% 1 hour

*10% 2 hours

Wharf Road car park – Season Tickets

Period	Customer p/a	Existing Tariff	Proposal
12 months	2		£475
6 months	0		£250
3 months	0		£135
1 month	0		£41
Income (Net VAT)		£0	£792
		Increase in income	£792

Heavily subsidised parking permit available for low paid workers (£10 per month)

Expected demand for Annual Permits

	Existing Tariff	Proposal
Net Income		
Circa	£1,192,000	*£1,560,000

*Includes the income from the removal of free parking from Knoll Road car park

Proposed income less 5% reduction in customers	£1,482,000
Proposed additional contribution to General Fund	£290,000

Annex B: Benchmarking Parking tariffs

Town Centre locations

Town	Up to	Up to	Up to	Up to	Up to		
	30 min	1 hour	2 hrs	3 hrs	4 hrs	All Day	6pm-8am
Reading		£1.70	£4.00	£6.00	£8.00	£20.00	£3.50**
Windsor		£1.70	£3.40	£5.10	£6.80	£14.00	Not found
Woking*		£1.50	£3.00	£4.50	£6.00	£12.00	£1.50
Guildford*		£1.50	£3.00	£3.00	£6.00	£10.00	£1.00
Basingstoke*		£1.10	£2.20	£3.20	£4.30	£9.60	£2.20
The Atrium +			£1.80	£2.20	£3.40	£7.00	£2.00
Knoll Road, Camberley		£1.00	£1.50	£2.00	£3.00	£4.00	£2.00
Wokingham	50p	80p	£1.20	£2.00	£2.00	£4.00	Not found
Farnborough		£0.60	£1.10	£1.60	£2.60	£4.00	£1.00
Aldershot		50p	£1.00	£1.50	£2.00	£3.60	Free

*Fees increased since 2019 + the Atrium is not managed by the Surrey Heath Council

Village commercial centres:

Rural	Up to	Up to	Up to	Up to	Up to		Days of
	30 min	1 hour	2 hrs	3 hrs	4 hrs	All Day	week
Blackwater	£0.35	£0.70	£1.40	£2.10	£2.80	£5.00	Mon-Sat
Englefield Green	N/A	£0.60	£1.20	£2.00	£3.00	£5.50	Mon-Sat
Farnham	N/A	£0.60	£1.30	£1.90	£2.60	£7.00	Mon Sat
Hartley Wintney	£0.35	£0.70	£1.40	£2.10	£2.80	£4.00	Mon-Sat
Borough wide P&D Car Parks	FREE	FREE	FREE	£0.40	£0.80	£2.50	Mon-Fri

Annex C: Costs and Income of multi-storey and pay and display car parks 2020/21.

	Main Square mscp	Knoll Road mscp	Surrey Heath House	Yorktown	Watchetts	Bagshot	Burrell	Chobham	Wharf Road
Employees	£110,912	£44,113	5,041	£10,083	£5,041	£10,083	£8,823	£10,083	£7,562
Non domestic rates	£355,725	£136,960	£0	£14,097	3,244	£8,358	£5,020	£6,861	£0
Premises	£138,670	£101,075	£0	£6,191	2,803	£7,709	£2,330	£5,878	£1,562
Transport	£3,002	£0	£0	£0	0	£0	£0	£0	£0
Supply/Service	£68,797	£19,356	£2,196	£2,742	2,411	£4,137	£2,057	£1,096	£0
Total Costs	£677,105	£301,504	£7,237	£33,113	£13,500	£30,287	£18,230	£23,918	£9,125

Income	-£369,063	-£96,332	-£3,153	-£1,927	-£2,054	-£5,160	-£4,892	-£3,823	£0
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Subsidy	£308,043	£205,171	£4,084	£31,186	£11,445	£25,128	£13,338	£20,096	£9,125
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Projected subsidy 2022/23

Financial Year	Main Sq mscp	Knoll Road mscp	Surrey Heath House	Yorktown	Watchetts Road	Bagshot	Burrell	Chobham	Wharf Road
Projected income 2022/23	£1,238,839	£253,449	£5,545	£14,395	£9,466	£19,034	£20,431	£38,673	£11,177
Costs (based on 2020)	£677,105	£301,504	£7,237	£33,113	£13,500	£30,287	£18,230	£23,918	£9,125
Subsidy	-£561,734	£48,055	£1,692	£18,718	£4,034	£11,253	-£2,201	-£14,755	-£2,052

Annex D: Equality Impact Assessment:

SURREY HEATH BOROUGH COUNCIL

EQUALITY IMPACT ASSESSMENT (EIA)

The Equality Impact Assessment is a tool to ensure that in the delivery and development of your service you meet the needs of our diverse community and at the same time demonstrate the Council is meeting its Equalities duties. Compliance with the general equality duty is a legal obligation, but it also makes good business sense to get things right for our community.

The Equality Impact Assessment should be a live document and it will be useful for you to start to complete it at the beginning of any process so that you can design into your work the steps you need to take to meet both customer needs and the legislative requirements. This will allow you to think both about the aims of the work and what you want to achieve, and also where there are barriers or issues for protected groups.

The public sector equality duty consists of a general equality duty, which is set out in section 149 of the Equality Act 2010, and specific duties which are imposed by secondary legislation. The duty covers eight protected characteristics which are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The equality impact assessment should cover the eight equality protected characteristics. The duty also covers marriage and civil partnership, but not for all aspects of the duty.

[The essential guide to the public sector equality duty](#) is available on the intranet.

The Equality Action Group and its members are available to consult before or during the assessment as well as reviewing it at the end. This does not have to be at formal meetings so please make use of this resource as and when you need to.

Stage 1: Scope of the assessment

Service area: Parking Services	Assessing Officer: Eugene Leal
Date: 11 January 2022	Activity/policy being assessed: Review of Parking Fees and Charges 2022.
What are the aims, purpose of the strategy/service etc?	
<i>To increase the parking charges in line with inflation to maintain income from parking fees in real terms. Fees in the multi-storey car parks were increased in June 2014. Fees for the Rural car parks were introduced in 2009, with the first 2 hours free of charge. The Review of Parking Fees and Charges are required to fund current maintenance and investment in our car parks across the borough, to promote the use of alternative modes of transport and thereby reduce emissions by private vehicles, ensure there is available parking in our commercial centres when needed by customers to these areas.</i>	

Detail who is / is going to be affected by the strategy, service etc (is it all Borough residents, or is it a particular group or groups of people).

All motorists who use the multi-storey car parks and pay and display car parks in Surrey Heath. Residents in Camberley town centre will have access residential annual season tickets at the same discounted rate offered to other Surrey Heath residents.

Procured services and grants

The general equality duty applies to other organisations who exercise public functions. This will include private bodies or voluntary organisations which are carrying out public functions on behalf of a public authority. The duty therefore applies to where the Council has contracted out a service or is considering contracting out or is decommissioning a service. It also applies to the allocation or withdrawal of grants.

Please state if the service is being provided by another organisation on the Council's behalf and what actions have been taken to ensure that the service complies with the equality duty e.g. provisions in the contract, monitoring of the service provided in terms of the protected groups (please refer to the Council's Procurement Toolkit).

N/A

Knowing our customers

Understanding our community is an important part of developing and delivering our services.

To help understand how your work impacts on the protected equality groups please detail the information that you have about the interaction of these groups with your service.

From this information detail any evident gaps or issues that need to be investigated e.g. in who accesses the service, satisfaction or other outcomes.

Blue Badge holders are provided free parking in our Pay and Display car parks, therefore, this amendment has no impact on their use of the car park. They are permitted to park free of charge when they display their Blue Badge in the relevant position. This continues.

Blue Badge holders pay for their parking in the multi-storey car parks as it is not possible to validate a their parking event the Blue Badge is issued to a person and not a vehicle. The Blue Badge holder can use their badge in any vehicle and conversley their vehicle may be used by a non-blue badge holder, so the automatic number plate system could not verify bona fide visits by a blue badge holder.

Engagement

If engagement is done well, it can help to improve the design and delivery of services, and increase trust in public authorities by promoting transparency and be a mechanism by which public authorities can be held to account by services users. It can lead to efficiency gains by improving service design at the planning stages. It can also help to identify whether more favourable treatment is necessary in order to meet particular needs. Good engagement can mean more sustainable services, as services that better meet the needs of users are likely to be more effective in the longer term.

A Notice of Variation will be published in the local paper, erected on each affected car park and advertised online for a minimum period of 21 days in accordance with the Road Traffic Regulation Act 1984.

Stage 2: Assessment and analysis

Public authorities under the equality duty, in the exercise of their functions, are required to have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

Please give examples of how the policy/service etc has or will further the three equality aims in the general equality duty? Please consider the positive and negative equality impacts relating to the protected groups: race, disability, age, sex, sexual orientation, religion or belief, gender reassignment and pregnancy and maternity within the policy/service etc? Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status.

In answering the above questions, think about:

Positive Impacts

Do you think that the strategy, service etc could have a positive impact on any of the equality groups: improve relations between groups, promote equal opportunities, improve accessibility of services and prevent discrimination, harassment and victimisation etc?

Negative Impacts

Do you think that the activity could impact negatively on people from the equality groups, if the impact is negative how can it be mitigated? Please consider the below areas.

- Publicity (including communication issues, design, distribution)
- Accessibility, location, opening times
- Poverty and social inclusion issues
- Discrimination
- Are groups represented in the consultation and the decision making process?
- How does current policy currently meet needs around the equality groups are there any unmet needs?
- Is there any evidence that there is higher or lower take-up by particular groups?
- Have there been any demographic changes or trends locally?
- Is there any indication that particular policies create problems for specific groups?

Race (Race refers to a group of people defined by their colour, nationality (including citizenship), ethnic or national origins).

Give examples of how this activity or policy has a positive or negative impact on this characteristic, or why you consider it has no impact. Please also describe any future work that you will be carrying out because of this assessment.

No Impact

Disability (A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities)

Give examples of how this activity or policy has a positive or negative impact on this characteristic, or why you consider it has no impact. Please also describe any future work that you will be carrying out because of this assessment.

No impact, the operation of the Blue Badge Scheme is unaffected. Free parking is provided in our surface pay and display car parks. However, in our multi-storey car parks Blue Badge holders are required to pay the parking fee.

Sex (Sex refers to someone being a man or a woman)

Give examples of how this activity or policy has a positive or negative impact on this characteristic, or why you consider it has no impact. Please also describe any future work that you will be carrying out because of this assessment.

No impact

Sexual orientation (This is whether a person's sexual attraction is towards their own sex, the opposites sex or both)

Give examples of how this activity or policy has a positive or negative impact on this characteristic, or why you consider it has no impact. Please also describe any future work that you will be carrying out because of this assessment.

No impact

Age (This refers to a person having a particular age (e.g. 32 year olds) or being within an age range (e.g. 18-30 year olds))

Give examples of how this activity or policy has a positive or negative impact on this characteristic, or why you consider it has no impact. Please also describe any future work that you will be carrying out because of this assessment.

Potential positive impact. Older drivers who have challenges with mobility may be able to receive a discretionary Blue Badge and should approach the Blue Badge team in their area to enquire about a Blue Badge. For Surrey residents, Blue Badges are administered by Surrey County Council. The proposals set out in this report are likely to result in more positive churn in the car parks meaning that an older person is more likely to find a parking space available at a convenient location when they need one.

Religion or belief (Religion means any religion, including a reference to a lack of religion. Belief includes religious and philosophical beliefs including lack of belief (for example, Atheism). Generally, a belief should affect your life choices or the way you live for it to be included).

Give examples of how this activity or policy has a positive or negative impact on this characteristic, or why you consider it has no impact. Please also describe any future work that you will be carrying out because of this assessment.

No impact

Gender reassignment (This is the process of transitioning from one sex to another. See also trans, transgender, transsexual)

Give examples of how this activity or policy has a positive or negative impact on this characteristic, or why you consider it has no impact. Please also describe any future work that you will be carrying out because of this assessment.

No impact

Pregnancy and maternity (Maternity is the period after giving birth. It is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, including as a result of breastfeeding).

Give examples of how this activity or policy has a positive or negative impact on this characteristic, or why you consider it has no impact. Please also describe any future work that you will be carrying out because of this assessment.

Potential positive impact. The proposals set out in this paper are likely to result in more positive churn in the Councils car parks meaning that a pregnant mother, or mother of young children, is more likely to find a car parking space when they need one. The further roll out of Ringo will also enable greater use of cashless payments for car parking without having to leave children while visiting a ticket machine or having to option to extend the parking period without having to return to the car park.

Marriage or Civil Partnership (Marriage is a union between a man and a woman: Civil partnership is legal recognition of a same-sex couple's relationship. Civil partners must be treated the same as married couples on a range of legal matters).

Give examples of how this activity or policy has a positive or negative impact on this characteristic, or why you consider it has no impact. Please also describe any future work that you will be carrying out because of this assessment.

No impact

Stage 4: Sign off

Completion by Assessing Officer:

Signature: Eugene Leal

Date: 11 Jan 2022

Received and reviewed by Service Head:

Actions arising:

Signature:

Date:

Received and reviewed by Equality Action Group:

Actions arising:

Date:

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Date of EIA review (usually in 3 years time or earlier if necessary):

Equality impact assessments and an annual summary of the results will be published on the Council's web site and sent to stakeholders and partners

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