

Surrey Heath Borough Council

Executive

17th July 2024

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

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

1. Summary and purpose

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

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

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

2. Recommendation

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

3. Background and Supporting Information

Local Plan content

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

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

Housing

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

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

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

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

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

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

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

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

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

Gypsies and Travellers and Travelling Showpeople

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

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

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

Employment and Retail

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

Table of Residual Forecast Employment Floorspace Need

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

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

Green Belt

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

Environment and Sustainability

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

Development Management Policies

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

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

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

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

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

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

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

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

Sustainability Appraisal

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

Background evidence

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

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

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

Publication

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

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

4. Reasons for Recommendation

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

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

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

5. Proposal and Alternative Options

5.1 The available options for the Executive to consider are:

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

6. Contribution to the Council's Strategy

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

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

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

7. Resource Implications

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

8. Section 151 Officer comments

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

9. Legal and Governance Issues

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

10. Monitoring Officer Comments

- 10.1 No matters arising.

11. Other Considerations and Impacts

- 11.1 No matters arising.

12. Environment and Climate Change

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

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

13. Equalities and Human Rights

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

14. Risk Management

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

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

15. Community Engagement and Communications

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

16. Annexes

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

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

16.3 Annex 3 – Surrey Heath Local Plan: Policies Map

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

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

17. Background Papers

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