

Last name	Question Number	Comments
<b>General Comments</b>		
The Camberley Society (Mr David Chesneau)	General	<p>The potential scope of 'sustainability' – its interpretation and implementation – is extensive and complex. It is helpful, therefore, that the Scoping Report in para 1.7 lists the topic areas that will be considered. {The report, along with other LDF documentation, is possibly wrong in saying that these areas "must be considered – Statutory Instrument 2004 No. 1633 simply says that areas "such as" those listed should be considered}.</p> <p>Having set out those areas that will be considered, it would be logical for the rest of the document to address each area specifically. However, Section 2 of the report includes the headings of 'Economy' and 'Sustainable Design'; Section 3 includes 'Crime'. None of these headings is included in the listed areas, and the structure of the report becomes difficult to follow. It is not clear that the conclusions have been derived logically through comprehensive analysis.</p>
Surrey County Council (Mr Richard Evans)	General	<p>The report is for SA/SEA scoping purposes. We do not demur from the general range and direction of the Scoping Report so as to comply with SA/SEA requirements. In particular we agree the identification of key sustainability issues under Section 4 Stage A3 Identifying Sustainability Issues and Problems. We have completed a Response form and submitted electronically.</p> <p>Page 1 para 1.6. – we agree that it is likely that proposals under a Camberley Town Centre would require environmental assessment. A substantial proposal will need to be accompanied by a TIA.</p>

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Broadway Malyan (Richard Anderson – Senior Planner)	General	<p>Broadway Malyan advise The Mall Corporation, owners of The Mall, Camberley on land-use planning and architectural matters which affect or may have the potential to affect the shopping centre.</p> <p>We are currently advising them on how the review of Planning Policy in the Borough, leading to a new Local Development Framework, will affect The Mall, Camberley and future opportunities to enhance both Camberley as a town as well as the shopping centre itself.</p> <p>We note the beginning of public consultation on a range of planning issues – most set out in draft consultation papers or reports. We look forward to working in partnership with The Council and it's officers, local residents and business to deliver a thriving and attractive town centre shopping experience which will complement recent and on-going investments such as The Atrium, all of which will result in an attractive and dynamic town centre environment.</p> <p>On behalf of The Mall, we would like to thank Surrey Heath Borough Council for the opportunity to comment on the Sustainability Appraisal/Strategic Environmental Assessment Scoping Report for the Camberley Town Centre, a very detailed and comprehensive document.</p> <p>At this stage in the formulation of the Local Development Framework and with regard to the above document, we have no detailed comments to make. For the sake of completeness, however, we have filled in the official representation forms (attached) which refers directly back to this letter.</p> <p>As the LDF process gathers momentum and other background/supporting documents are put out to consultation we will review and where appropriate submit representations.</p> <p>Thank you again for the opportunity to become involved in the Local Development Framework and shaping future planning policy.</p>
English Heritage (Mr Steve Williams)	General	<p>I understand that the scoping work draws upon generic work done for the wider LDF, with the intention that it should provide a greater focus on town centre issues.</p> <p>I have a few comments to make. Clearer definition of the extent of the AAP is required than that provided by the diagram at the end of Section 1.</p>

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<b>Question 1: Are there any other policies, plans, programmes or sustainability objectives that will affect or influence the DPD?</b>		
The Camberley Society (Mr David Chesneau)	1	<p>Although the listing of policies etc in the report covers several pages, it would be unrealistic to try to mention every policy that might have a bearing on the SA. However, two documents/topics that are relevant to town centres and which may not be adequately covered by the listed policies are microgeneration (see DTI's 'Microgeneration Strategy' March 2006) and sustainable drainage (see the National SUDS Working Group's Interim CoP, 2004). Indeed, the latter topic is mentioned explicitly in Section 5 of the report.</p> <p>Para 2.18 is misleading by implying that the aim is to achieve 10% renewable energy by 2010 et al. The target is, of course, to supply 10% of <i>electricity demand</i> by renewable energy.</p>
English Nature (Ms Carole Mortimer)	1	English Nature welcomes the inclusion of the Habitats Directive (1992) and the Birds Directive (1979) together with PPS9 as key documents in the preparation of this scoping report.

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Environment Agency (Mr Ian Davie)	1	<p>Table 1 - We believe PPS23 should be included in the table. The baseline data shows 18 sites are under further investigation in Surrey Heath. We are unsure if any of these fall within the Town Centre AAP boundaries. However, through previous uses, for example, car parks, contamination may have occurred. This should be remediated as part of any redevelopment.</p> <p>Key Messages - Paragraphs 2.5-2.6 and 2.9-2.10 - Green roofing may be an option for the enhancement of biodiversity and the provision of open space. Modern green roofs involve re-creating natural environments. Green roofs are used across Europe, and becoming common in Germany and Switzerland, where they are recognised to confer high environmental benefits. In a town centre area, where property values are high, the inclusion of green roofs helps to achieve:</p> <ul style="list-style-type: none"> <li>• reduced quantity and better quality of surface water run-off</li> <li>• improved air quality</li> <li>• reduction of the urban heat island effect</li> <li>• reduced energy consumption for air conditioning</li> <li>• improvements to biodiversity</li> <li>• better visual qualities, potential for the creation of useable green space</li> <li>• and potential for re-use of recycled aggregates</li> <li>• green roofs can also form part of sustainable drainage systems</li> </ul> <p>Paragraph 2.10 We welcome the inclusion of water resources in the key messages. As part of maintaining water quality, PPS23 should be taken into account. The remediation of land affected by contamination provides benefits to both surface water and groundwater quality. With regards to the rate of surface water runoff, we will look to new developments to reduce the rate of runoff to a figure as close to the greenfield runoff rate as possible.</p>
Surrey County Council (Mr Richard Evans)	1	<p>Page 8 – Reference should be made to the Parking Strategy for Surrey in the list of relevant Plans and Policies. Additionally, ‘Surrey Design’ (not Surrey Design Guide) was published by the Surrey Local Government Association, not Surrey County Council as stated. The Borough may also wish to consider including the County Council’s SPG on Structure Plan Policy SE2 Renewable Energy.</p>

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English Heritage (Mr Steve Williams)	1	<p>I would advise on the inclusion of a couple more documents for consideration under Stage 1, Table 1. The <i>Convention on the Protection of Archaeological Heritage (Revised) (Valetta Convention)</i>. The Convention contains provisions for the identification and protection of archaeological heritage, its integrated conservation, the controls of excavations, the use of metal detectors and the prevention of illicit circulation of archaeological objects, and the dissemination of information. It was ratified by the UK in September 2000, and provides for a broad definition of 'archaeological heritage' that includes 'structures, constructions, groups of buildings, developed sites, moveable objects, monuments of other kinds as well as their context, whether situated on land or under water. 'Culture at the Heart of Regeneration' DCMS, June 2004 provides guidance on what has been shown to work well where culture acts as a catalyst to regeneration.</p> <p>I note that one of the key messages from the context review is that the AAP should seek to protect and sustain the historic environment, including archaeology and while the baseline analysis indicates the absence of designated assets in the form of listed buildings, scheduled monuments or conservation areas within the town centre, it will be important to take account of impacts upon the setting of these features and to be aware of, for example, the potential for impact arising from additional traffic drawn to the redevelopment area. Locally important features that contribute to character and distinctiveness need to be taken into account and I note the reference at para 3.37 to the town's Victorian heritage and suggest that the baseline be added to by inclusion of locally important buildings. I believe that the Borough has in excess of 300 buildings, some of which might be within the AAP area.</p>
<b>Question 2: Is the baseline information collected relevant, accurate and of sufficient detail to support the DPD?</b>		
The Camberley Society (Mr David Chesneau)	2	<p>Section 2 identifies key messages potentially relevant to the AAP. Baseline data should presumably directly refer to the topics concerned. However, the first baseline characteristic (also, confusingly, called a 'key message') is 'Population'. Other than in the introduction, this is the first time that population has been mentioned explicitly - the relevance is difficult to determine. Also, how will the various numerical factors listed be used to 'measure' sustainability?</p> <p>Section 2 itemises air quality, water management and sustainable resource use (including energy efficiency and the expansion of renewable energy) amongst its key messages. No baseline information relating to these topics is evident in Section 3.</p> <p>In summary, we believe that a substantial revision of Section 3 of the report is required.</p>

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Environment Agency (Mr Ian Davie)	2	We are concerned that the water resources section, identified in the Key Messages, is not included in this section.  We would also like land affected by contamination to be included in this section.
Surrey County Council (Mr Richard Evans)	2	Appendix 2, page 15 – it would appear that 46.7% of the population of the Town Ward travels less than 5km to work. This offers an opportunity to increase the numbers travelling to work by non-car modes.
English Nature (Ms Carole Mortimer)	2	Biodiversity – this key message is flawed in identifying the protection of the Thames Basin Heaths SPA as being protected by the Habitats Directive of 1994. All Special Protection Areas (SPAs) have been designated under, and are protected by, the Birds Directive of 1979 in addition to the Habitats Directive. This requires Member States to classify the most suitable territories in number and size for the conservation of rare or vulnerable species listed on Annex 1 (Art 4.1). The Thames Basin Heaths were selected as they are an area regularly used by 1% or more of the Great Britain population of nightjar, woodlark and Dartford warbler. Please make the necessary amendments to this passage and also note that the Thursley, Ash, Pirbright and Chobham SAC is designated under the Habitats Directive (1994).  Camberley Town Centre is approximately 1km from the Thames Basin Heaths SPA and as such requires adequate mitigation in the form of semi-natural greenspace. English Nature appreciates that this land has been difficult for Surrey Heath BC to identify and that a forthcoming wider study by Land Use Consultants will highlight which land may be used. However, it is still vital to make clear links to a Core Strategy policy on the protection of the SPA within the AAP.  It is essential therefore that suitable mitigation lands are also identified and if necessary secured to ensure that delivery of the allocation can occur in line with the Delivery Plan
<b>Question 3: Should any baseline indicators be added, removed or revised?</b>		
The Camberley Society (Mr David Chesneau)	3	See response to question 2.
Environment Agency (Mr Ian Davie)	3	See response to question 2.
English Nature (Ms Carole Mortimer)	3	See response to question 2.
Surrey County Council (Mr Richard Evans)	3	See response to question 2.

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<b>Question 4: Do you agree that these are the key sustainability issues for Surrey Heath?</b>		
The Camberley Society (Mr David Chesneau)	4	<p>This is an excellent listing of some of the challenges. Some of the basic philosophy merits further examination - for example, is it still appropriate to regard Camberley as a "multi-purpose centre"? Given the modest size of the town, this could - 2 - result in a 'jack of all trades, master of none'. In view of the developments planned for neighbouring towns, it might be better to give Camberley a distinctive 'niche' character. This could require different rather than "additional" retail floorspace. Although a dedicated bicycle infrastructure would not be a complete solution to Camberley's traffic problems, the UK does compare unfavourably with many continental countries in its provision for bicycles. The issue should be addressed explicitly in the AAP.</p> <p>Given our broad agreement with this section, we point out with some reluctance that it seems to be largely independent of the previous and subsequent sections in the report.</p>
Environment Agency (Mr Ian Davie)	4	<p>Water resources and land affected by contamination should be included under the environmental section.</p> <p>We recommend that green roofing be suggested as a way to partially address water quality, air quality, energy consumption, green space provision and biodiversity loss. SUDs should be used to reduce the risk of flooding. This could be a problem with major redevelopments, where high densities could conflict with the incorporation of SUDs.</p>

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English Nature (Ms Carole Mortimer)	4	<p>Camberley Town Centre AAP should be closely linked to the Thames Basin Heaths SPA SPD. This should identify mitigation land and could be addressed by the Borough's own strategy once this is developed. English Nature welcomes the production of an Infrastructure DPD to address the need to ensure development and human activities do not adversely affect the SPA and the SAC. However, there has been no consultation with English Nature on this document to date and so we are unable to comment. We would be pleased to advise on the production of this document and wish to be involved at the earliest opportunity. At this early stage we recommend that the document addresses the effects of development on biodiversity and geodiversity as a whole throughout the Borough.</p> <p>The AAP should address the issue of adequate greenspace within Camberley town centre not by assessing the need for such greenspace as there is already sufficient research highlighting the benefits of greenspace (ENRR 153). It is important to identify the areas which will provide this greenspace within the AAP and to state how far they go towards fulfilling greenspace targets.</p> <p>SEA Directive Annex 1 (d) has not been incorporated into Table 2: Sustainability issues and problems. Sustainability cannot be fully discussed in terms of social and economic issues alone. Both biodiversity and sustainable use of resources must be included as discussed below. In addition, housing cannot be considered sustainable if it does not meet the requirements of the The Conservation (Natural Habitats &amp; c.) Regulations 1994.</p> <p>There is a need within this document for links to policies on climate change and water resources. These issues are clearly relevant to the AAP which represents an opportunity to ensure that new development will have a neutral or beneficial effect upon climate change and also promote water conservation. We would like to see specific policies highlighting how Surrey Heath BC intends to achieve these objectives. For instance, there should be a minimum target for the percentage of new development using Sustainable Urban Drainage Schemes (SUDS).</p>

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Surrey County Council (Mr Richard Evans)	4	<p>Providing the right amount of town centre car parking. This should not be at such a level as to encourage access by car.</p> <p>Retail Needs Assessment – this should be based on the current position of Camberley within the Structure Plan retail hierarchy, and the direction given within the emerging SE Plan. The study would need to encompass existing growth and within town centres within a given hinterland of Camberley TC.</p>
English Heritage (Mr Steve Williams)	4	Table 2 sets out identified sustainability issues, including 'effect of new development upon the character of the town centre'. The Council agrees that this needs to be addressed, and suggests a Design Strategy. The draft RSS emphasises the need to safeguard character and distinctiveness and this suggests the need for an understanding of the different town centre character areas in the first place, before coming forward with design solutions.
<b>Question 5: Are there any other issues you think should be included?</b>		
The Camberley Society (Mr David Chesneau)	5	See response to question 4.
Environment Agency (Mr Ian Davie)	5	See response to question 4.
Surrey County Council (Mr Richard Evans)	5	See response to question 4.
English Heritage (Mr Steve Williams)	5	See response to question 4.
English Nature (Ms Carole Mortimer)	5	See response to question 4.
<b>Question 6: Do you agree that the sustainability objectives, decision aiding questions and indicators provide an appropriate framework for the SA of the DPD?</b>		
The Camberley Society (Mr David Chesneau)	6	<p>A full list of sustainability objectives would be impossibly large. So, although we generally agree with those set out, we cannot say that they are complete in detail. (Also, we note, for example, that para 2.15 talks about encouraging tourism. Arguably, there should be a related tourism sustainability objective.) Objective 9 is incomplete - we assume that it relates to the best use of brownfield sites?</p> <p>Objective 20 causes us concern, for it does not go far enough. It suggests that only statutory listed buildings/monuments are important. (We have seen a similar inference elsewhere in SHBC LDF documents). We disagree - locally-listed buildings have been listed because they are of significance locally. They should be monitored and whether or not they are at risk should be part of any detailed indicator.</p>

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Surrey County Council (Mr Richard Evans)	6	Sustainability objective 19 – additional detailed indicator – number of travel plans entered into on voluntary basis. We suggest amending existing indicator ‘planning permissions with green travel plans’ to remove reference to ‘green travel plans’. This will refer to up-to-date terminology.
English Heritage (Mr Steve Williams)	6	Table 3 Objective 20 relates to the historic environment. I would ask you to consider modifying this along the lines ‘to protect and enhance the landscape, buildings, sites and features of archaeological, historical or architectural interest and their settings; and to increase public access where appropriate’. Given the baseline information, it is readily apparent that the ‘headline indicator’ and some of the detailed indicators would not apply and these should be tailored to locally important buildings and impacts on character areas.
English Nature (Ms Carole Mortimer)	6	<p>SA Objective 8 - The detailed indicator should ask for the number of new developments using SUDS, in the current document there is no onus on the developer to provide a minimum level of houses using this technology.</p> <p>SA Objective 9 – ODPM (2006) Planning for Biodiversity and Geological Conservation: A Guide to Good Practice, suggests that previously developed land (PDL) be assessed as regards its biodiversity value. Any valuable sites should be identified early on in the development of the LDF and protected as appropriate through DPD policies. The Housing Needs DPD only considers PDL in terms of derelict, degraded and underused land, whereas ‘brownfield’ sites can be wildlife refuges and must be monitored for the presence of protected species. Therefore, a headline indicator could be the number of sites identified as of nature conservation value and protected as such. These sites are especially valuable as they may be able to contribute to both the Delivery Plan and greenspace targets.</p> <p>SA Objective 14 – English Nature has previously (responses dated 21<sup>st</sup> November 2005 and 19<sup>th</sup> April 2006) suggested some indicator targets which will monitor the condition of the Borough’s biodiversity. As Surrey Heaths’ encompasses large areas of internationally important heathland, it is appropriate that the populations, and additionally the range, of wild birds (particularly Dartford warbler, woodlark and nightjar) should be regarded as a headline indicator. However, this target is more appropriate when assessing the level of protection of the SPA, together with the area and condition of the SPA. Consequently, it should be used as a detailed indicator for SA Objective 17. The headline indicators for conservation and enhancement of the Borough’s biodiversity should be;</p> <ul style="list-style-type: none"> <li>• BAP habitats – i.e. the extent of key habitats for which BAPs have been established including areas of restoration and recreation.</li> <li>• Designated wildlife sites – their area and condition – including internationally, nationally and locally important sites (such as LNRs and SNCIs).</li> </ul>

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		<p>If Surrey Heath BC wishes to use 'Changes in population of selected characteristic species' as an additional indicator it would be appropriate at this stage to define which species are to be used. Additionally, the range of all species should be monitored, as reduction in range of an indicator species is an early sign of biodiversity loss across a habitat.</p> <p>Surrey Heath BC should consider working in partnership with the Surrey Biodiversity Records Centre (BRC) to help acquire this data.</p> <p>SA Objective 15 – The inclusion of ancient woodland as a detailed indicator for flora and fauna is welcomed , but the size and extent of the woodland should be incorporated into the assessment as well as the reported condition of the site. This sustainability objective, number 15, should read:</p> <ul style="list-style-type: none"> <li>• 'To avoid damage and fragmentation to all habitats of importance for flora and fauna'.</li> </ul>