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**Surrey Heath Borough  
Council Local Plan 2016  
- 2032**

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**Interim Capacity Study**

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**April 2018**

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# 1 Introduction

- 1.1.1 Housing delivery is a key element of preparing a Local Plan. The Government has stressed the need to plan for the right homes in the right places and expects local authorities to develop up-to-date plans with their communities that meet their housing requirement (or, if that is not possible, to work with neighbouring authorities to ensure it is met).
- 1.1.2 In February 2012, the Council adopted the Surrey Heath Core Strategy and Development Management Policies Development Plan Document, which set out strategic policies to guide development within the Borough between 2011 and 2028; the Plan included a target of 3,240 (net) new homes. However, subsequent to the adoption of the Core Strategy in 2016, an updated joint Strategic Housing Market Assessment (SHMA) undertaken with Hart and Rushmoor Councils was published, indicating Surrey Heath to have an Objectively Assessed Housing Need (OAHN) significantly greater than the quantum of development set out with the Core Strategy. As a result, in late 2016 Surrey Heath Borough Council took a decision to prepare a new Local Plan for the Borough. This Interim Capacity Paper has been prepared as background evidence to support the Surrey Heath Draft Local Plan Issues and Options Consultation.
- 1.1.3 In preparing the new Local Plan, the Council has undertaken a broad portfolio of work in order to establish the extent to which the emerging Local Plan can meet its housing needs in a way that is consistent with the policies of the National Planning Policy Framework, taking into account the significant environmental and policy constraints affecting the Borough and how these may affect housing delivery within the Borough.
- 1.1.4 This Paper details the portfolio of work undertaken to date to establish the extent to which the emerging Local Plan can meet its housing needs, in addition to setting out the key environmental and policy constraints to housing delivery that affect the Borough. The Paper also sets out the steps that the Council will undertake during the remainder of the plan making process to minimise unmet housing need and the Council's approach to addressing any residual demonstrated unmet housing need.

## 2 Housing Need in Surrey Heath

### 2.1 Strategic Housing Market Assessment

2.1.1 Surrey Heath forms a Housing Market Area (HMA) with Hart District and Rushmoor Borough Councils. A housing market area is a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work. The HMA partners have jointly commissioned three Strategic Housing Market Assessments (SHMA), which have historically been used to identify the scale and mix of housing and the range of tenures that the local population within the HMA is likely to need over the plan period. The most recent iteration of the SHMA (2016) identified an objectively assessed housing need of 1,200 homes per annum across the HMA between 2014 and 2032 (see table 2.1). Of these, 382 homes per annum are identified as being required within Surrey Heath, which equates to a total need of 6,876 dwellings to be provided in the Borough in the period 2014 to 2032.

HMA Local Authority Area	Dwellings per annum
Hart	382
Rushmoor	436
Surrey Heath	382
Total (HMA)	1,200

Table 2.1: Objectively Assessed Housing Need in the Hart, Rushmoor and Surrey Heath Housing Market Area

### 2.2 Consultation on Planning for the Right Homes in the Right Places

2.2.1 Notwithstanding the evidence set out within the most recent iteration of the SHMA, in September 2017 the Government published a consultation entitled '*Planning for the right homes in the right places*'. This consultation paper arose from matters raised in the Housing White Paper, published earlier in 2017. Proposals set out in the consultation included a standard methodology for calculating local authorities' housing need.

2.2.2 The consultation paper was accompanied by a summary of housing need for each local authority, based on the proposed methodology. The data for the three authorities is set out below (table 2.2), with a comparison against the objectively assessed housing need established through the most recent Strategic Housing Market Assessment.

Local Area	Authority	OAHN (SHMA 2017) dwellings per annum	New Methodology (dwellings per annum)	Net Difference (+/-)
Hart		382	292	-90

Rushmoor	436	294	-142
Surrey Heath	382	352	-30

Table 2.2: Comparison between the SHMA OAHN for the HMA and the proposed standard methodology

2.2.3 Transitional arrangements for implementing the new methodology were proposed in the consultation paper and are replicated in table 2.3 below.

Plan Stage	Proposed transitional arrangements
No Plan, or Plan adopted more than five years ago and has not yet reached publication stage	The new standardised methodology should be used, unless the plan will be submitted for examination on or before 31 <sup>st</sup> March 2018, or before the revised Framework is published (whichever is later).
Plan has been published, but not yet submitted	If the plan will be submitted for examination on or before the revised Framework is published (whichever is later), continue with the current plan preparation – otherwise use the new standardised method.
Plan is at examination stage	Progress with the examination using current approach.
Plan adopted in the last five years	Use the new standardised method when next reviewing or updating the Plan.

Table 2.3: Proposed transitional arrangements set out within the ‘planning for the right homes in the right places’ consultation paper

2.2.4 In line with the proposed transitional arrangements set out in the consultation paper, Rushmoor has chosen to continue with submission of their current Local Plan, which is based on meeting their objectively assessed need as identified in the SHMA. The Plan was submitted to the Secretary of State on 2nd February 2018.

2.2.5 When the consultation paper was published, Hart’s plan-making had not yet reached Regulation 19 Stage. Accordingly, in line with the transition arrangements, Hart’s Regulation 19 Proposed Submission Version Local Plan is based on the proposed standard methodology and was published on 9th February.

## 2.3 Consultation on the draft revised National Planning Policy Framework

2.3.1 On 5th March, subsequent to the submission of the Rushmoor Local Plan and publication of the Hart Regulation 19 Proposed Submission Version Local Plan but prior to the publication of the Issues and Options draft of the Surrey Heath Local Plan (Regulation 18) document, the Government published a consultation on a draft revised National Planning Policy Framework and draft Planning Practice Guidance,

which incorporates policy proposals previously consulted on in the Housing White Paper and the '*Planning for the right homes in the right places*' consultation.

- 2.3.2 The draft revised version of the National Planning Policy Framework and Planning Practice Guidance carries forward the standard methodology for calculating local authorities' housing need as set out within the '*Planning for the right homes in the right places*' consultation.
- 2.3.3 In respect of transitional arrangements, the draft revised version of the National Planning Policy Framework indicates that the Policies set out within the previous Framework will apply for the purpose of examining plans, where those plans are submitted on or before an unidentified date which is intended to be six months after the date of the final Framework's publication. After this time, the Policies within the new NPPF will apply.

## **2.4 Surrey Heath Borough Council's position**

- 2.4.1 The Council's current Local Development Scheme indicates that the Surrey Heath Local Plan DPD will be submitted to the Secretary of State in September 2019. This will be some 18 months after the publication of the draft revised NPPF consultation and as such, it is envisaged that by this time, the Policies within the new NPPF will apply. As a result, the housing requirement set out within the Surrey Heath Issues and Options Draft of the Local Plan (Regulation 18 Stage) has been prepared on the basis of the proposed standard methodology for calculating local authorities' housing need, which indicates Surrey Heath to have an identified housing need of **352 dwellings per annum** across a revised plan period of 2016 – 2032<sup>1</sup>.
- 2.4.2 Notwithstanding this, it is recognised that this may not be the figure which is deliverable within Surrey Heath. Neither the Government's standardised methodology, nor its predecessor (the Strategic Housing Market Assessment) take into account the impact upon the deliverability of the housing need figure of constraints, some of which are recognised in footnote 9 of Paragraph 14 of the National Planning Policy Framework<sup>2</sup> as reasons as to why an authority may not be in a position to deliver its housing requirement. Surrey Heath is subject to a number of such constraints, which have been reviewed in the following section
- 2.4.3 Surrey Heath is subject to a number of policy and environmental constraints and as such, a first step in identifying the extent to which the emerging Local Plan can deliver its housing needs in a way that is consistent with the policies of the National Planning Policy Framework is to examine these constraints and their implications.

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<sup>1</sup> This reflects that the proposed standard methodology is based in part on 2014 household projections, which were published in July 2016.

<sup>2</sup> Footnote 7 of Paragraph 11 of the draft revised National Planning Policy Framework.

## **3 Constraints to residential development within Surrey Heath**

### **3.1 Introduction**

3.1.1 As noted in Paragraph 2.4.3, Surrey Heath is subject to a number of policy and environmental constraints; some of these are recognised in footnote 9 of Paragraph 14 of the National Planning Policy Framework<sup>3</sup> as reasons as to why an authority may not be in a position to deliver its housing requirement. The constraints considered particularly relevant to Surrey Heath have been set out below, together with a brief discussion of the potential these have to affect the capacity of Surrey Heath to deliver residential development within the Borough.

### **3.2 The Thames Basin Heaths Special Protection Area and 400m buffer zone**

3.2.1 The Thames Basin Heaths Special Protection Area (SPA) is designated under the EU Habitats Directive (transposed into the UK habitats regulations). The designation affects a number of heathland areas which do, or could, support rare ground nesting birds, including the Dartford Warbler, Nightjar and Woodlark. 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 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.

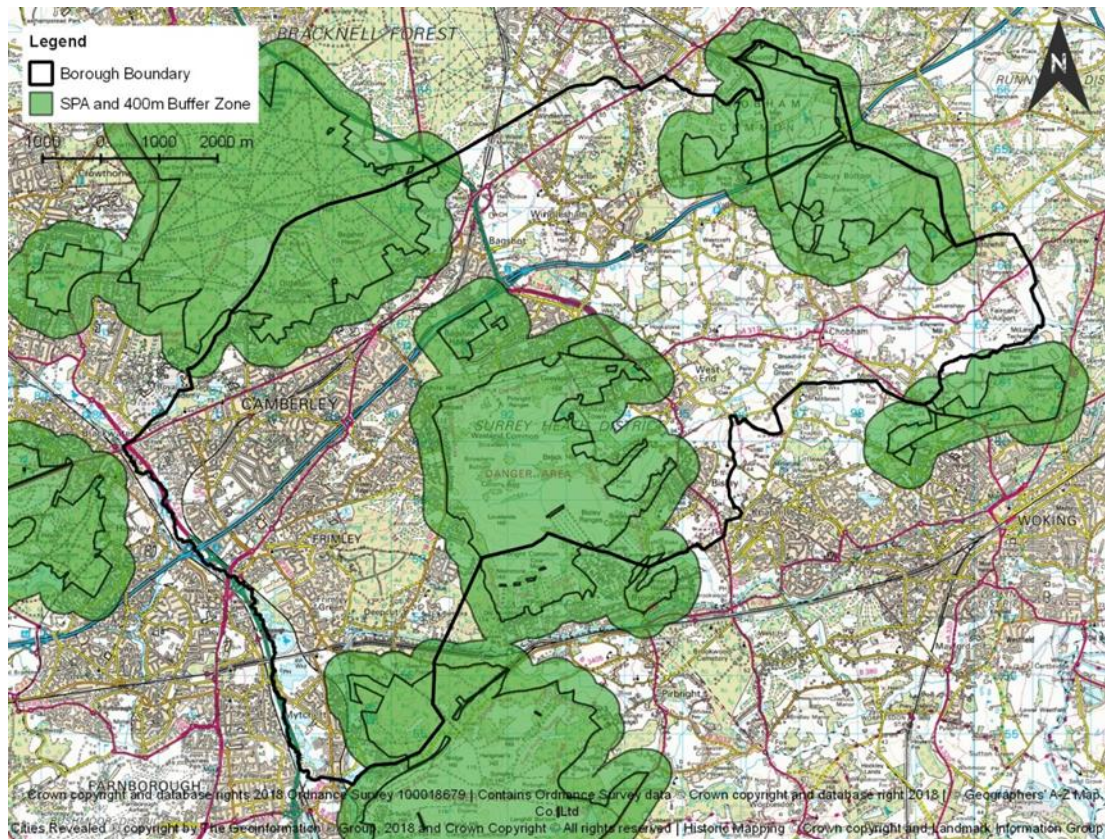
3.2.2 No residential development is permitted within the Special Protection Area. Furthermore, in 2009, the Thames Basin Heaths Joint Strategic Partnership Board (JSPB) endorsed a strategic Delivery Framework, which recommends a combination of three avoidance measures to protect the Thames Basin Heaths 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.

3.2.3 The Thames Basin Heaths SPA covers approximately 23% of the Borough and the associated 400m buffer zone affects a further 19% of the Borough (see figure 3.1); as such, the designation has significant implications for the availability of land for development within the Borough.

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<sup>3</sup> Footnote 7 of Paragraph 11 of the draft revised National Planning Policy Framework.





**Figure 3.1: Extent of the Thames Basin Heaths Special Protection Area and 400m buffer zone**

3.2.4 The Special Protection Area also has implications for residential development beyond the 400m buffer zone, with the strategic Delivery Framework also establishing the principle of Suitable Alternative Natural Greenspace (SANG). SANGs are areas that are not currently in use for recreation and so are a new alternative provision or are existing areas that are significantly under-used and have the capacity to absorb additional recreational use to avoid the risk of additional recreational pressure arising on the SPA. New residential development within Surrey Heath is considered to give rise to likely significant effects to the SPA and is required to contribute towards avoidance measures, including SANGs. Developments of more than 100 dwellings will generally be expected to provide on-site SANG, which has the potential to affect the development capacity of applicable sites.

### **3.3 Thursley, Ash, Pirbright & Chobham Special Area of Conservation (SAC)**

3.3.1 The Thursley, Ash, Pirbright and Chobham Special Area of Conservation (see figure 3.2) is designated under the EU Habitats Directive (transposed into the UK habitats regulations), which protects sites from significant effects on their integrity. The SAC is designated for three Annex I habitats, including wet heathland with cross-leaved heath, dry heaths and depressions on peat substrates. Development is identified as having potential to impact upon the SAC through recreational pressure, air pollution, water abstraction and water quality. 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, whilst an absolute constraint to development in itself, 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 presence of the Thames Basin Heaths Special Protection Area.

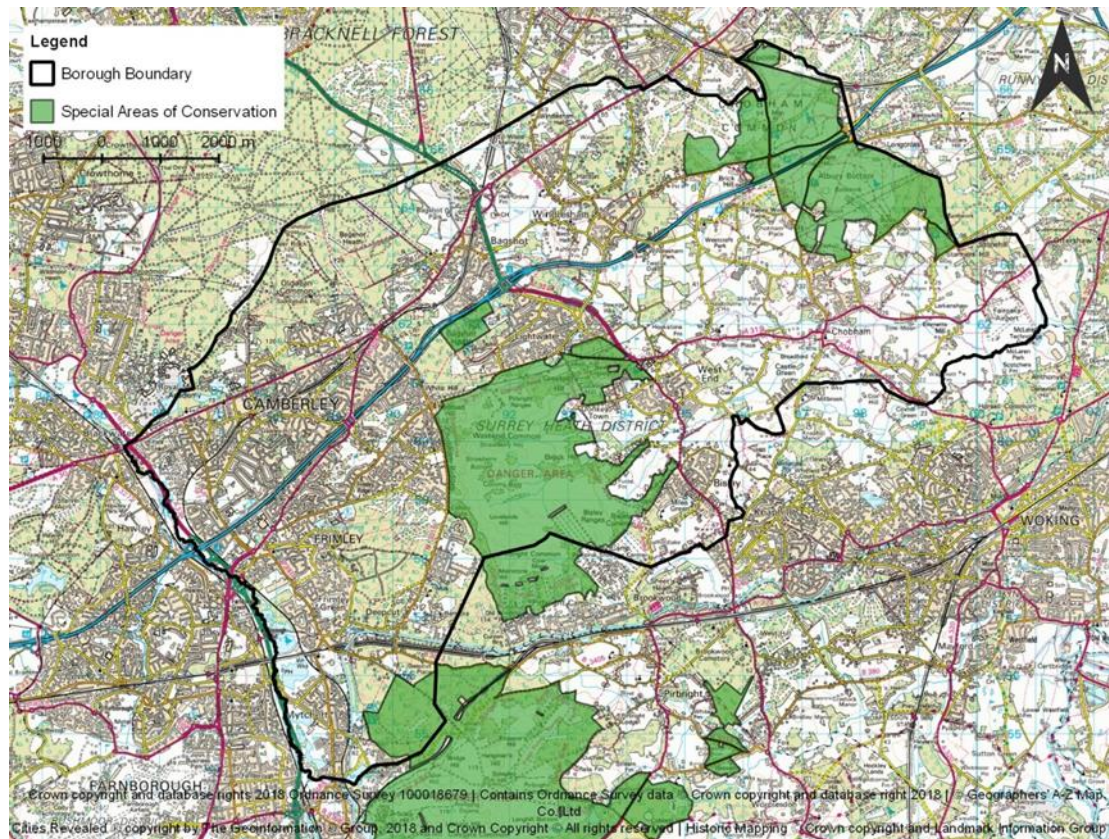


Figure 3.2: Extent of the Borough’s Special Areas of Conservation

### 3.4 Sites of Special Scientific Interest (SSSI)

- 3.4.1 Sites of Special Scientific Interest (SSSI) are protected under UK law to protect and conserve their wildlife or geology. There are four SSSI’s within Surrey Heath, including Colony Bog and Bagshot Heath SSSI, Ash to Brookwood Heaths SSSI, Broadmoor to Bagshot Woods and Heaths SSSI, and Basingstoke Canal SSSI (see figure 3.3). All of these SSSIs coincide with the Thames Basin Heaths SPA, with the exception of Basingstoke Canal SSSI.
- 3.4.2 The National Planning Policy Framework (NPPF) states that development on land within or outside a SSSI likely to have an adverse effect on the site, either individually or in combination with other developments, should not normally be permitted. With three of the four SSSI’s coinciding with the Thames Basin Heaths SPA, the impact of SSSI’s upon the availability or capacity of land to deliver development of these SSSI’s is not significantly greater impact than the SPA.



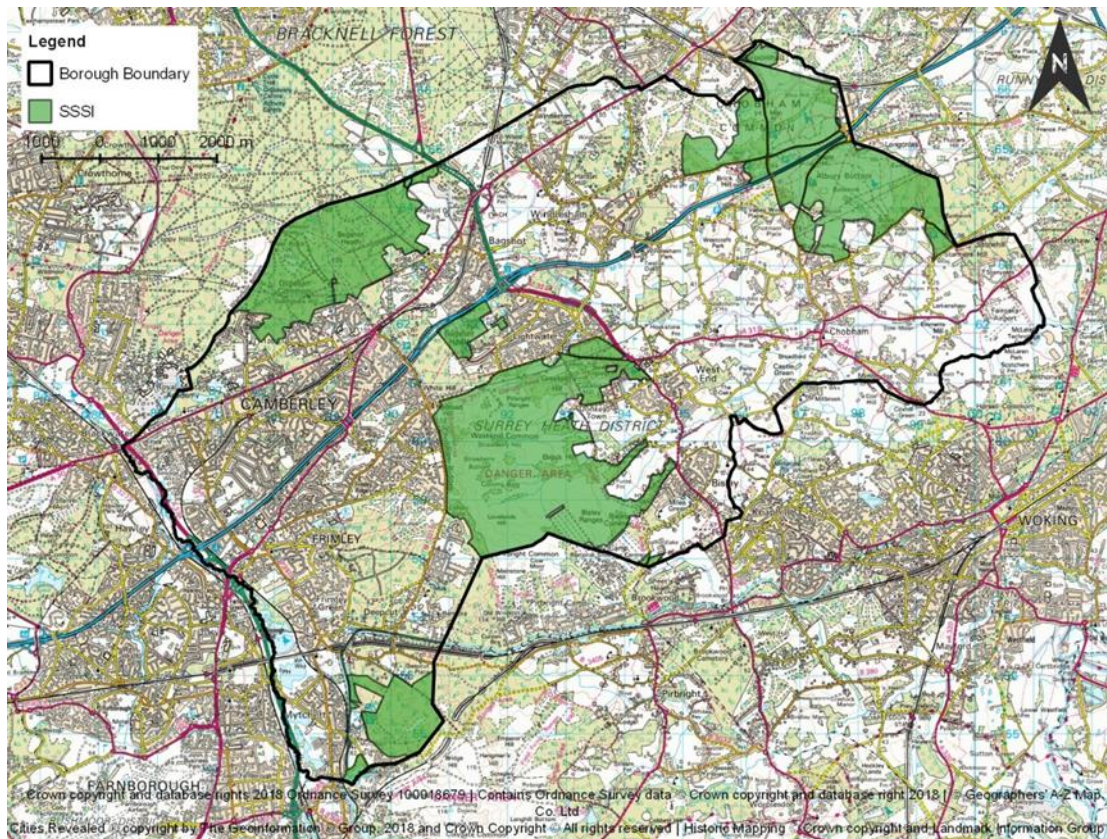


Figure 3.3: Extent of Sites of Special Scientific Interest within Surrey Heath

### 3.5 Green Belt

3.5.1 The NPPF supports the ongoing protection of the Green Belt. In seeking the ongoing protection of the Green Belt, the NPPF advises that:

*“the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence” (NPPF Paragraph 79)*

3.5.2 Paragraph 87 of the NPPF indicates that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances, which will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

3.5.3 Paragraph 89 of the NPPF indicates that a local planning authority should regard the construction of new buildings as inappropriate in Green Belt, except in specific circumstances, including, but not limited to:

- the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or

- limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

3.5.4 Both the existing and proposed versions of the NPPF indicate that it is possible to revise Green Belt boundaries through the Local Plan-making process, but that boundaries should nonetheless only be altered in exceptional circumstances. The draft revised National Planning Policy Framework, which incorporates policy proposals previously identified within the Housing White Paper, adds to the existing national policy to indicate that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries:

*“the strategic plan-making authority should have examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of the plan, which will take into account... whether the strategy;*

*a) makes as much use as possible of suitable brownfield sites and underutilised land;*

*b) optimises the density of development, including whether policies promote a significant uplift in minimum density standards in town and city centres, and other locations well served by public transport; and*

*c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground”*

3.5.5 Over 44% of land within Surrey Heath is designated as metropolitan Green Belt (see figure 3.4); as such, the capacity of this area to accommodate residential development is considered to be significantly limited, without revision to existing Green Belt boundaries.



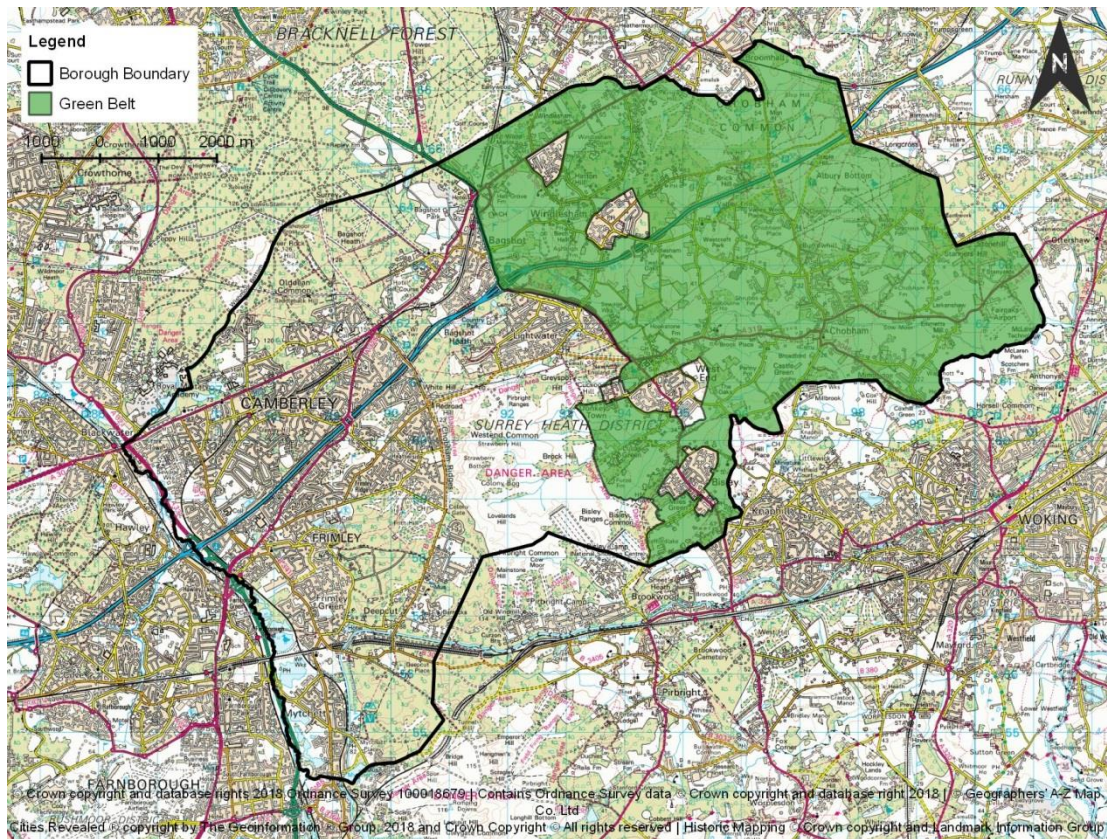
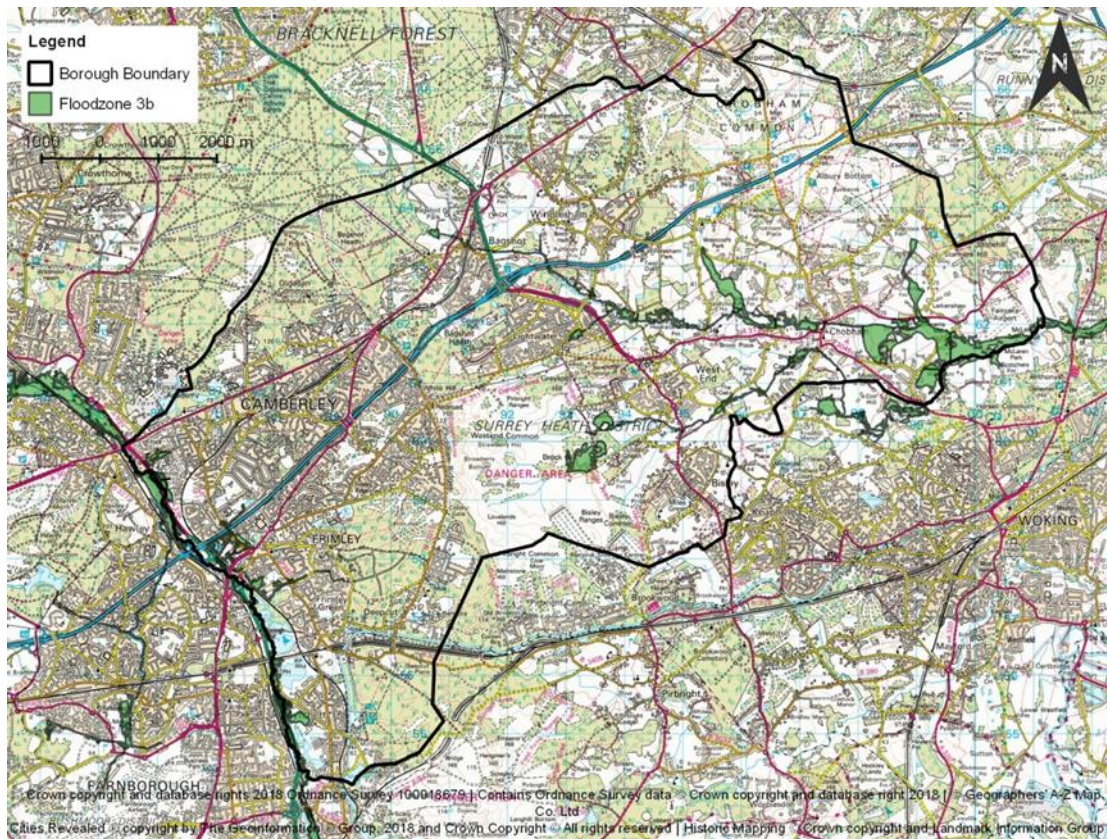


Figure 3.4: Extent of Green Belt within Surrey Heath

### 3.6 Other Constraints

- 3.6.1 In addition to the constraints referenced in footnote 9 of Paragraph 14 of the National Planning Policy Framework, a number of other constraints are considered to significantly affect the capacity of the Borough to accommodate residential development. The most notable of these include Flood Zone 3b and the Farnborough Public Safety Zone, which are both considered to be absolute constraints to development.
- 3.6.2 Flood Zone 3b, also known as Functional Floodplain comprises land where water has to flow or be stored in times of flood. In line with NPPF, all new development should be kept outside of the Functional Floodplain, with the exception of certain 'water compatible' land uses (e.g. recreational and conservation uses), as well as essential transport/utilities infrastructure that have no viable alternative location. Functional floodplain is not developable for residential uses, including residential care homes, caravans and mobile homes.
- 3.6.3 Functional floodplain is present within Surrey Heath, along the river valleys of the Blackwater and Bourne catchment areas including some main-river designated tributaries (see figure 3.5). This is considered to affect the availability of land for residential development on a localised basis.

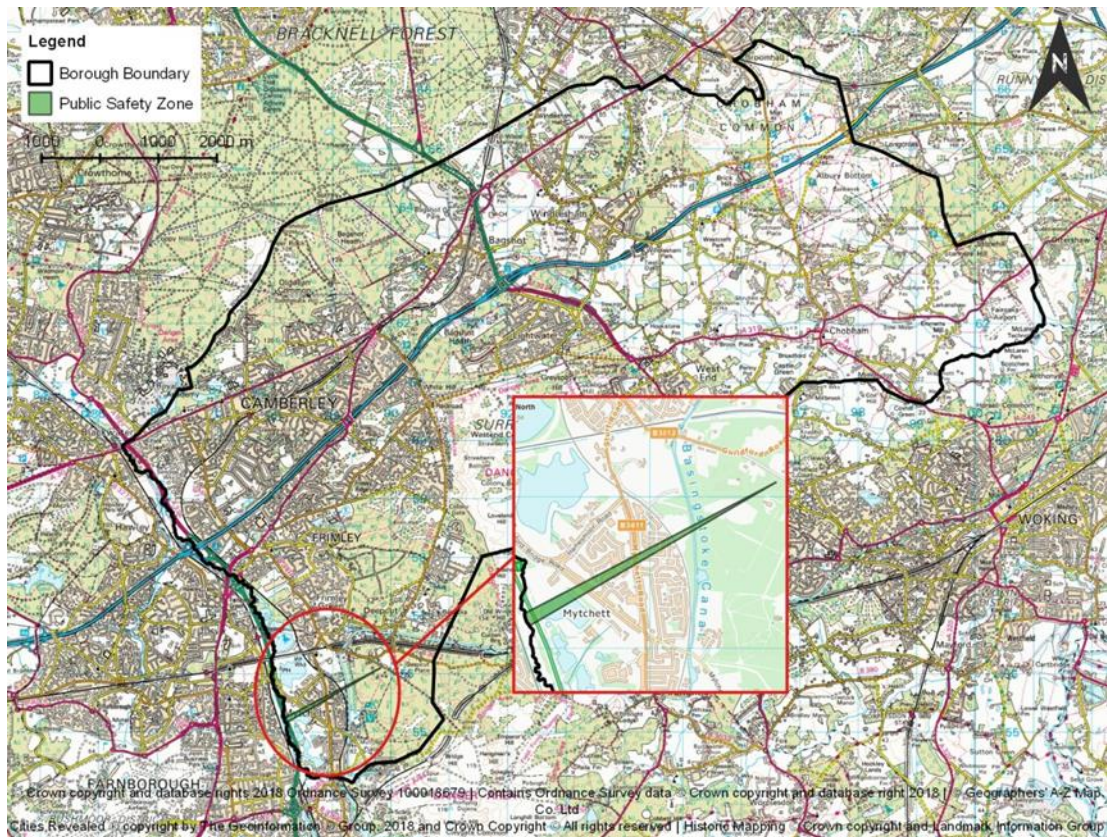




**Figure 3.5: Extent of Functional Floodplain (Flood Zone 3b) within the Borough**

- 3.6.4 Public Safety Zones are areas at either end of a runway within which development is restricted in order to control the number of people on the ground at risk of death or injury in the event of an aircraft accident on take-off or landing. The Department for Transport Circular 01/2010 (Control of Development in Airport Public Safety Zones) sets out that the basic objective governing the restriction on development near civil airports is that there should be no increase in the number of people living, working or congregating in Public Safety Zones and that, over time, the number should be reduced as circumstances allow.
- 3.6.5 There are Public Safety Zones at either end of the runway at Farnborough Airport. The Public Safety Zone to the easternmost end of the runway bisects the settlement area of Mytchett and surrounding and countryside (see figure 3.6). The policy objective set out in Circular 01/2010 therefore applies in this location and represents an absolute constraint to net new residential development on a localised basis.



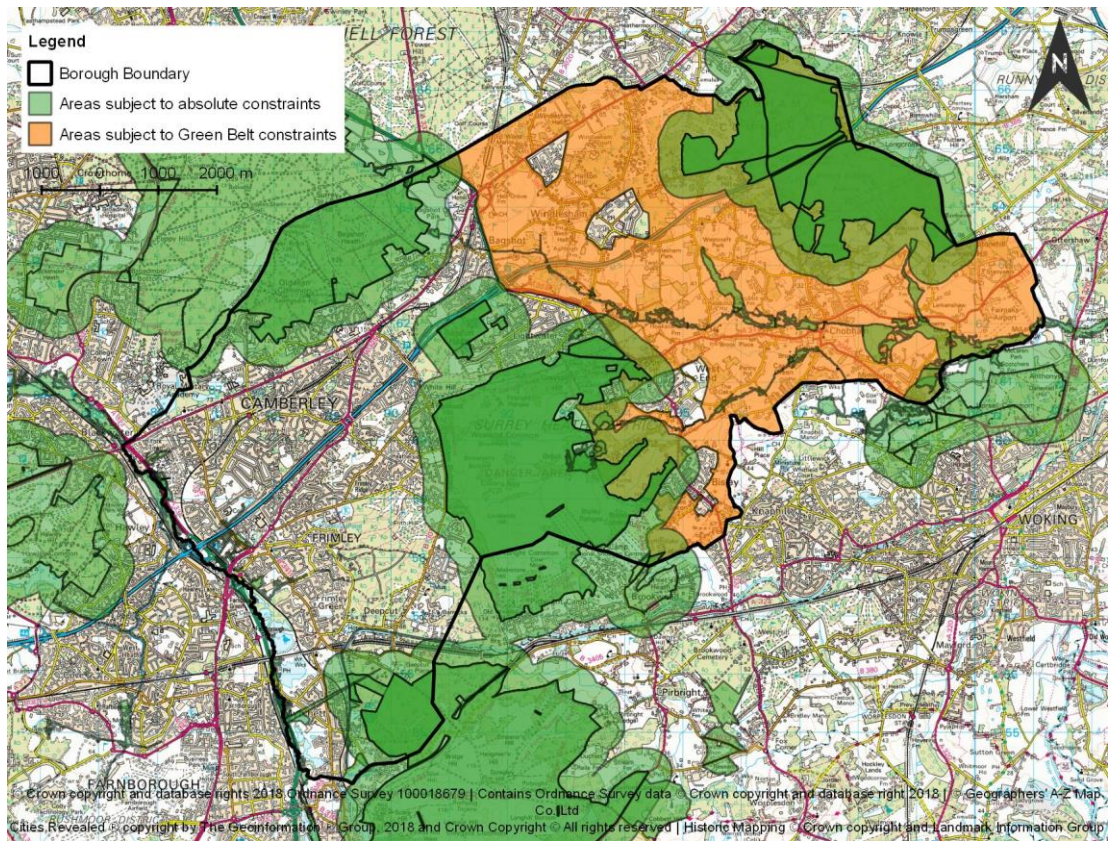


**Figure 3.6: Extent of the Farnborough Public Safety Zone within Surrey Heath**

### *Cumulative impact of identified constraints*

- 3.6.6 Overall, 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, which is considered to represent a very significant constraint to residential development (see figure 3.7).





**Figure 3.7: Areas within Surrey Heath affected by absolute constraints and Green Belt constraints to housing development**

## 4 Housing Supply in Surrey Heath

### 4.1 Introduction

- 4.1.1 In view of the significant policy and environmental constraints to housing development within Surrey Heath, the Council has sought to undertake a number of pro-active steps in order to maximise the Borough's future supply of housing in the emerging Local Plan. An updated Strategic Land Availability Assessment (SLAA) was published in November 2017. The study brings together information from work completed by the Council that has explored all available opportunities for meeting the Borough's housing needs over the new Local Plan period. The SLAA identifies land in the Borough which is suitable, available and achievable for housing and other land uses over the plan period.
- 4.1.2 The National Planning Policy Framework (NPPF) advises Local Authorities should use a proportionate evidence base to support Local Plans. Paragraph 159 of the NPPF states that for housing, evidence should include preparation of *“a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.”*
- 4.1.3 The Government's Planning Practice Guidance (PPG) sets out how a SLAA should be undertaken. The guidance includes a proposed methodological approach, to help ensure a robust study is produced. In accordance with the PGG, a joint SLAA Methodology has been prepared for the three Housing Market Area (HMA) authorities of Hart, Rushmoor and Surrey Heath. In addition, a site assessment pro forma template has been developed for the three authorities to use for the assessment of individual sites in the SLAA. The Surrey Heath SLAA applied the HMA's Methodology and assessed all sites using the joint pro forma, in order to present a consistent approach to site assessments, as instructed by the PPG.
- 4.1.4 Surrey Heath's 2017 SLAA was based on the spatial strategy defined in the borough's adopted Core Strategy (2012). Accordingly, the SLAA has had regard to the absolute and non-absolute constraints set out in the preceding section of this report. As Surrey Heath's emerging Local Plan develops, future SLAA studies will assess sites in line with the new spatial strategy included in the Draft Local Plan.

### 4.2 Identifying a Supply of Available Sites

- 4.2.1 In preparing the 2017 SLAA, the Council undertook a number of proactive steps to provide a robust supply of sites. In the first instance, confirming the availability of sites was fundamental in establishing whether there was potential for their development. Where sites were not advised to be available there could be no certainty that they would come forward. As such, these sites were not included as part of Surrey Heath's housing supply.
- 4.2.2 The Council's first step in preparing the SLAA was to undertake a formal Call for Sites, inviting landowners, developers and any other interested parties to submit new sites in Surrey Heath for consideration as residential or other types of potential development.

4.2.3 The Call for Sites had a broad outreach, and was publically advertised on Surrey Heath Borough Council's website. A webpage was created where public access was made available to pro formas for submitting sites, and a copy of the SLAA Methodology was made accessible. To ensure every opportunity was made to identify potential sites that could contribute to Surrey Heath's land supply, the following categories of organisations and individuals were contacted directly, as part of the exercise:

- Developers,
- consultants,
- businesses,
- community groups,
- public sector organisations,
- landowners.

4.2.4 The Council has been proactive in targeting a wide spread of potential sites from various landowner types, in order to build a robust selection of available sites. This has included locations with underutilised land, such as surplus public sector sites and established sites that could benefit from intensification or co-location of services. Organisations that were contacted include Coldingley Prison in Bisley, Surrey County Council Estates, and the Ministry of Defence, the latter being approached through the Government's One Public Estate Programme. The Council has also identified land within its ownership that can be developed for housing.

4.2.5 All landowners or agents for sites contained within the Council's previous SLAA study that were not categorised as excluded were contacted again through the 2017 Call for Sites. Where confirmation of sites' availability was received, this enabled their retention as part of the Council's housing supply. In addition, it provided the opportunity for landowners to make revisions to their sites, enabling the updated SLAA to take account of these changes. Following the identification of a potential supply of available sites, the Council was subsequently able to consider their suitability and achievability.

### **4.3 Pro-active steps the Council took to address housing need for the emerging Local Plan**

#### *Reviewing CTC AAP Sites*

4.3.1 The Camberley Town Centre Area Action Plan 2014 (CTC AAP) identifies and allocates several town centre sites for residential led development. These allocations provide a degree of certainty of the sites' availability, and form a robust element of Surrey Heath's housing supply. Furthermore, some of the AAP sites have either been built out, or now benefit from planning permissions. The completed and approved developments have significantly over delivered in respect of their total residential capacities, when compared with numbers of units in their original AAP allocations. This has been demonstrated at sites such as Pembroke Broadway North, where the Council purchased land and now has planning permission for a 116 unit scheme, delivering 66 further units than its AAP allocation.



4.3.2 Surrey Heath Borough Council has been establishing an ambitious portfolio of projects to provide an improved Camberley Town Centre. This has included the purchase of land at The Mall Shopping Centre (now The Square) and Ashwood House. The Council is now also the majority landowner at the London Road Block site. This provides clarity, that in addition to being available, the suitability and achievability of the AAP sites is based on strong evidence and can be measured against the Council's previous performance for delivering such schemes in excess of their housing allocation figures. The remaining AAP sites have been reviewed and it has been determined through the SLAA that their capacities can be increased, ensuring the most efficient use of land in sustainable brownfield locations.

SLAA Ref	AAP Name	Site	AAP Allocation Units (net)	SLAA 2017 Capacity (net)	Increase in Capacity (net)
811 & 814	London Road Block		0	336	336
25	Camberley Station		50	60	10
26	Pembroke Broadway North		50	116	66
27, 722 & 770	Land East of Knoll Road		80	130	50
727	Former Magistrates Court		13	30	17
<b>Total Units (net)</b>			<b>193</b>	<b>672</b>	<b>479</b>
Outcome: An increased housing supply of 479 additional net units over existing allocations that have not yet been delivered has been generated.					

#### *Co-Location of Services*

4.3.3 The Council has pioneered the co-location of services in the Borough, to centrally locate services within Surrey Heath House. This initiative has resulted in the creation of additional vacant sites within public ownership, such as the former Job Centre and former Camberley Police Station. As a result, opportunities have been generated for the redevelopment of these sites for housing. The Surrey Heath Estates and Assets Management Team were engaged with internally, in order to establish whether the Council could decommission any of its assets or relocate any other services to Surrey Heath House. No further opportunities for land availability were generated as a result of these discussions, at the time they were held.

SLAA Ref	Site Name	Capacity Generated from Site (net)
n/a	Former Job Centre, Parkgate House	12
722	Former Camberley Police Station	31

<b>Total Units (net)</b>	<b>43</b>
Outcome: An increased housing supply of 43 additional net units has been generated, from co-location of services at Surrey Heath House, to date.	

*Surrey Heath Borough Council Land and Assets*

- 4.3.4 In order to identify any further available sites, productive discussions were undertaken with the Council’s Estates and Assets Management Team which sought to establish whether the Council would be in a position to submit any of its own land or assets for assessment in the SLAA. Where sites were considered to be available, their suitability and achievability were assessed through the SLAA process. This resulted in the inclusion of additional public sector land within the ownership of Surrey Heath as part of its housing supply.
- 4.3.5 By virtue of landowner confidence in these sites coming forward within the Local Plan timeframe, the sites form a robust element of the Borough’s supply. This has been consolidated by the planning approvals at two of the sites: Pembroke House and Ashwood House. In addition, further unanticipated sites were put forward by the Council for redevelopment, subsequent to publication of the SLAA, which have now secured planning permissions.

<b>SLAA Ref</b>	<b>Site Name</b>	<b>Capacity Generated from Site (net)</b>
606	Pembroke House, Frimley Road	25
763	Land at Elder Road	8
424	Land rear of 1-47 Sullivan Road	14
811 & 814	London Road Block	336
26	Pembroke Broadway North	116
Total Units (net)		499
<b>Total Units (net) excluding CTC AAP sites already accounted for</b>		<b>47</b>
Outcome: An increased housing supply of 47 additional net units has been generated, from the redevelopment of SHBC owned land, to date.		

*Surrey County Council Land and Assets*

- 4.3.6 As part of the comprehensive work undertaken to establish a supply of available sites, Surrey County Council (SCC) was contacted through the Call for Sites, in order to determine whether there was land that SCC could put forward for assessment in the SLAA. This resulted in additional public sector land being identified in the SLAA for redevelopment as housing, including larger sites within sustainable urban areas, with greater capacity to maximise the intensity of sites. Again, the available sites put forward were assessed for their suitability and achievability.

- 4.3.7 Sites within SCC ownership provide a robust element of the Council's housing supply, qualifying as surplus public sector assets belonging to an organisation seeking to optimise the use of its available land.

SLAA Ref	Site Name	Capacity Generated from Site (net)
247	Bagshot Highway Depot & Archaeology Centre	C2 use (care home)
27	Former Portesbery School	45
801	Pinehurst	C2 use (care home)
240	Camberley Adult Education Centre	45
770	Camberley Library	54
Total Units (net)		144
<b>Total Units (net) excluding CTC AAP sites already accounted for</b>		<b>45</b>
Outcome: An increased housing supply of 45 additional net units has been generated from the redevelopment of SCC owned land, to date.		

*One Public Estate Programme*

- 4.3.8 The Council has had involvement with the One Public Estate Programme (OPE), working with the Local Government Association (LGA) and the Cabinet Office Government Property Unit (GPU) to explore opportunities for unlocking public sector owned land for housing.
- 4.3.9 The majority of publicly owned land in the borough is within the ownership of the Ministry of Defence. Two potential sites were identified through the Cabinet Office's One Public Estate programme, following a bid made for OPE funding by the Council. These sites were Land at Frith Hill, Deepcut and Staff College London Road, Camberley. The Defence Infrastructure Organisation (DIO) has now confirmed that Frith Hill is required for operational purposes and is not available.
- 4.3.10 Discussions with the DIO have taken place in respect of Land at Barossa Common, Camberley, which adjoins the Staff College site. However, the availability of this site for potential development has not yet been confirmed and as such, the site was not included in the 2017 SLAA. The Council is continuing engagement with the DIO through the OPE Programme in order to establish the future potential of the site in helping to meet Surrey Heath's housing needs.

SLAA Ref	Site Name	Capacity Generated from Site (net)
n/a	Land at Barossa Common, Camberley	0
<b>Total Units (net)</b>		<b>0</b>

Outcome: No additional units from the OPE programme form part of Surrey Heath's housing supply, at this time.

#### *Other Standalone Public Sector Sites in the Borough*

The Call for Sites exercise was proactive in targeting locations where land has been underused, such as surplus public sector land, or established sites that could have potential for intensification or co-location of services. Organisations that were contacted included Coldingley Prison in Bisley and NHS Estates. However, no land from either of these potential opportunities was advised to be available, at the time they were contacted. The Council will continue to have open dialogue regarding the potential future use of public sector land for housing with these and other relevant organisations.

SLAA Ref	Site Name	Capacity Generated from Site (net)
<b>Total Units (net)</b>		<b>0</b>
Outcome: No additional units from alternative standalone public sector sites in the Borough, beyond SHBC and SCC estates, form part of Surrey Heath's housing supply, at this time.		

#### *Release of Employment Land for Housing*

- 4.3.11 The status of employment sites in Surrey Heath and the wider HMA was considered through the joint Hart Rushmoor Surrey Heath Employment Land Review. The study indicated that existing Core Employment Areas in Surrey Heath should be retained as either Strategic or Locally Important sites, as well as certain other standalone employment sites in the Borough.
- 4.3.12 The conclusions of the study also indicated that some employment sites in the Borough were not functioning effectively in their current use. In addition, these sites were not required to meet future employment needs. Consequently, such sites have been considered for alternative uses to employment, with a principal focus on housing. Landowners were contacted through the Call for Sites, and where they were able to confirm the availability of sites, these were assessed for their suitability and achievability. An example of a site that was previously in employment use and is being redeveloped for residential, is the former Bisley Office Furniture site which now has permission for 110 dwellings and is currently under construction.
- 4.3.13 Since the introduction of the Prior Notification process for office to residential conversions in 2013, standalone employment buildings have consistently come forward for housing, through this route. There is currently no evidence to suggest a decline in the number of residential units being delivered through this process in Surrey Heath. Sites already benefitting from Prior Approval for conversion to residential are also documented in the 2017 SLAA.



SLAA Ref	Site Name	Capacity Generated from Site (net)
<b>Sites in employment use forming housing supply for the Local Plan</b>		
738	Queen Anne House, Bagshot	9
218	Land rear of Half Moon Street/High Street, Bagshot	47
317	The Deans, Bridge Road, Bagshot	20
320	Tanners Yard, London Road, Bagshot	9
557	Land west of Sturt Road, Frimley Green	99
314	Travis Perkins, 280 Gordon Avenue, Camberley	15
295	439-445 London Road, Camberley	15
35	407-409 London Road, Camberley	38
606	Pembroke House, Frimley Road, Camberley	25
26	Pembroke Broadway North, Camberley	116
25	Camberley Station and Offices	60
<b>Employment sites with Prior Approval for conversion to housing</b>		
325	Bagshot Manor, Bagshot	39
714	Seal House, Bagshot	16
731	Absolute Building, Frimley	91
716	Norwich House, Camberley	57
793	Wyvern House, Frimley	35
789	Compass House, Camberley	41
<b>Total Units (net)</b>		732
<b>Total Units (net) excluding CTC AAP sites and public sector land already accounted for</b>		<b>531</b>
Outcome: Currently, an increased housing supply of 531 additional net units has been generated over the emerging new Local Plan period from the release of employment land.		

*Other Opportunities for Developing Underutilised Land in the Borough*

- 4.3.14 The Council has also sought to engage directly with the owners of the S.C. Johnson employment site in Frimley Green, which covers an area of 26.5ha. However, at this stage it has been confirmed that this site is not available for redevelopment.
- 4.3.15 As part of a search for broad areas of growth at London Road, west of Camberley Town Centre, land with potential for redevelopment was identified adjoining the junction of Frimley Road and London Road. Landowners were contacted as part of the Call for Sites exercise and responses confirming availability of land were received. The suitability and achievability of the available site area was then assessed through the SLAA. This resulted in part of the wider site being included in the 2017 SLAA for a mix of uses, primarily residential.

SLAA Ref	Site Name	Capacity Generated from Site (net)
804	Land East of Frimley Road and south of London Road, Camberley	16

<b>Total Units (net)</b>	<b>16</b>
Outcome: An increased housing supply of 16 additional net units has been generated, from the Council's search for additional underutilised land in the Borough, to date.	

*Identifying Sites in the Countryside for Potential Release*

- 4.3.16 In accordance with Surrey Heath's spatial strategy in the adopted Core strategy, development within the Borough will be met through effective use of previously developed land in settlement areas and the large strategic site at Princess Royal Barracks in Deepcut. After 2025, if insufficient sites have come forward within settlement areas, the spatial strategy enables the release of sustainable sites within Countryside Beyond the Green Belt. This has been considered through the SLAA process.
- 4.3.17 Where site assessments determined a non-previously-developed site located in the countryside was acceptable for development notwithstanding the Greenfield status of the land, these sites have been indicated to be suitable for possible release from the countryside, as part of the SLAA process. Such sites have been included in the medium to long term SLAA categories, reflecting their indicative phasing in the new plan period. Therefore, these sites form part of Surrey Heath's housing supply for the emerging Local Plan.
- 4.3.18 Following the Call for Sites, it was also determined through the SLAA that certain sites submitted to the Council should be excluded from Surrey Heath's land supply. Land submitted at Pine Ridge Golf Course, Old Bisley Road is a site located in undeveloped countryside. The site is particularly significant in respect of its overall site area, at 68 hectares, and the number of dwellings for which it has been promoted.
- 4.3.19 The Call for Sites submission originally indicated the site to be available for the development of 1,855 units, which was subsequently reduced to 1,000 units, following a Developer Panel consultation exercise that was held by the Council. Despite the site's availability, minimal evidence was presented in respect of the site's suitability or achievability for the quantum of development indicated. Constraints impacting the site include a Woodland Tree Preservation Order covering the entire site area, and Special Protection Area 400 metre buffer zone covering part of the site area. Furthermore, adequate on-site SANGs provision would need to be addressed in order to accommodate the number of units indicated.
- 4.3.20 The Council has considered the possibility that the site could be suitable for a lower quantum of development. However, the promoters of the site have not indicated that the site would be made available for any further reduction in the number of units, and therefore it has not been possible to assess the site for a smaller scale development. Consequently, there is significant uncertainty in respect of the site's availability and achievability for a development comprising of a reduced number of units, in addition to the suitability concerns. For this reason, the site cannot be considered for a reduced scheme, at this time.

SLAA Ref	Site Name	Capacity Generated from Site (net)
803	Land at Waters Edge, Mytchett	150
557	Land west of Sturt Road, Frimley Green	99
407	Highways Farm, 226 London road, Bagshot	6
408	Land r/o 192-210 London road, Bagshot	20
757	Land North of Guildford Road, Deepcut	21
<b>Total Units (net)</b>		296
<b>Total Units (net) excluding sites located in the countryside, already accounted for under employment land release</b>		<b>197</b>
Outcome: An increased housing supply of 197 additional net units has been generated through indicated release of Countryside Beyond the Green Belt land, to date.		

#### *Optimising the Proposed Capacity of SLAA Sites*

- 4.3.21 Following completion of the above steps to identify sites that contribute to Surrey Heath's housing supply for the emerging Local Plan, the SLAA still demonstrated a shortfall against Surrey Heath's identified housing need. As a result of this, work was then undertaken to reassess the capacities of sites. This has been carried out to ensure the proposed density of development at sites is being fully optimised, with the aim of maximising the potential of sites, particularly those that are on brownfield land and in sustainable locations.
- 4.3.22 It is worth noting that prior to this work, the capacities of sites had already been maximised to a degree, through SLAA assessments, increases in residential accommodation at CTC AAP allocated sites, and the other above steps taken to address housing supply for the plan period.
- 4.3.23 In accordance with the SLAA Methodology, sites were reassessed in order to determine whether there were any further opportunities for their capacities to be increased again, beyond what had originally been achieved. The following factors were given consideration in this exercise:
- The landowners' or agents' given capacities for sites submitted;
  - The overall site area and its shape;
  - The location of the site (town centre/settlement/edge of settlement/rural) and its sustainability;
  - The surrounding context including specifically, average capacities of surrounding residential areas;
  - Existing site specific conditions including any constraints that affect the site and its potential capacity.
- 4.3.24 Following completion of the above steps, the Council published an initial draft of the 2017 SLAA and held a Developer Panel Consultation. This provided an opportunity for developers, those with land interests and local property agents to submit comments on the approach taken to site assessments in accordance with the SLAA



Methodology, and the achievability of individual sites, ensuring that any assumptions made in the SLAA were correct. The comments submitted to the Council during the Developer Panel were taken into consideration and, where appropriate, the study was amended to account for these, prior to publication of its final version.

4.3.25 The table below displays the sites where capacities were increased as a result of reassessments to optimise the density of the SLAA sites:

SLAA Ref	Site Name	Revised Capacity (units)	Net	Increase in Capacity from Original (units)
314	280 Gordon Avenue, Camberley	15		5
281	Land Rear Half Moon Street/ High Street, Bagshot	47		20
25	Camberley Station, Pembroke Broadway	60		10
225	439-445 London Road, Camberley	15		5
770	Camberley Library, Knoll Road, Camberley	54		33
804	Land east of Frimley Road & South London Road, Camberley	16		4
240	Camberley Centre, France Hill Drive, Camberley	45		10
329	251 Frimley Green Road, Camberley	17		4
<b>Total Increase in Units on Brownfield Land (net):</b> (figure includes CTC AAP sites, employment sites and public sector land already accounted for in the tables above)				91
<b>Total Increase in Units on Brownfield Land (net):</b> (excluding CTC AAP sites, employment sites and public sector land already accounted for in the tables above)				0
Outcome: An increased housing supply of 91 additional net units has been generated from reassessment of SLAA sites to optimise their capacity. However, this figure is already accounted for within the series of steps outlined throughout this section of the Capacity Study. Therefore excluding previous steps, the contribution to housing supply from this source is 0 net units.				

4.3.26 It is important to note that there is not currently SANGs catchment covering Bagshot and the Snows Ride settlement area of Windlesham. Consequently, sites located in these areas containing more than 9 net units and not providing on-site SANG, are phased in the housing supply beyond 5 years, in the SLAA. The Council is seeking to address this, through investigating possible options to introduce new SANG that could provide coverage for the Bagshot area.

## 4.4 What was the outcome of the above processes?

4.4.1 In accordance with the Government's Standardised Methodology, Surrey Heath's identified housing need is set out at 352 units per annum, and is applied over the 16 year plan period of 2016-2032, resulting in an overall housing need of 5,632 units. In order to take all possible steps for Surrey Heath to meet this figure, the Council has, in addition to the requisite housing supply generation activities stated in the

PPG, completed the various additional steps outlined above. This has decreased Surrey Heath’s shortfall against its identified housing need figure. The following summary provides an outline of how these housing supply activities have contributed to additional housing supply for the Borough:

• <b>Reviewing capacities at CTC APP allocations at remaining AAP allocated sites that are not yet delivered:</b>	<b>479 net units</b>
• <b>Co-location of services:</b>	<b>43 net units</b>
• <b>Unlocking underutilised public sector land owned by SHBC:</b>	<b>47 net units</b>
• <b>Unlocking underutilised public sector land owned by SCC:</b>	<b>45 net units</b>
• <b>One Public Estate Programme:</b>	<b>ongoing</b>
• <b>Other opportunities for release of public sector land:</b>	<b>ongoing</b>
• <b>Release of employment land:</b>	<b>531 net units (comprising 279 units arising from Prior Notifications and 252 units at other employment sites)</b>
• <b>Other underutilised land in the Borough:</b>	<b>16 net units</b>
• <b>Identifying sites in the countryside for potential release</b>	<b>197 net units</b>
• <b>Optimising capacity of SLAA sites:</b>	<b>Already accounted for in the figures provided through the above steps</b>

4.4.2 All processes listed above were completed in conjunction with, or as part of the Borough’s Call for Sites exercise, which was undertaken to inform the SLAA. In addition to the supply generated from these steps, other submissions in the Call for Sites submitted for assessment in the SLAA contributed a further 645 dwellings (not including sites already with planning permission) to Surrey Heath’s housing supply.

4.4.3 To help ensure the SLAA was a fully robust study, where landowners or agents representing previous SLAA sites did not respond to the 2017 Call for sites following reminder letters being issued, those sites were not carried forward for assessment, as their availability could not be confirmed. As a consequence, sites amounting to 197 units included in the 2016 SLAA supply were not included in the 2017 SLAA. This step was integral, in order to avoid the inclusion of unavailable sites in the SLAA, which would have presented an unrealistic picture of housing land supply in Surrey Heath, distorting the Borough’s future housing projections and compromising the accuracy of the study.

- 4.4.4 In combination, the processes recorded above have boosted Surrey Heath's housing supply by a total of 1,358 units. This has helped to significantly reduce the Borough's shortfall of housing over the emerging plan period. However, there is a remaining unmet need which currently stands at 731 units against the overall figure of 5,632. This shortfall is recognised in the Regulation 18 Issues and Options consultation version of the draft Surrey Heath Local Plan.
- 4.4.5 Following the comprehensive range of activities undertaken to address the borough's identified housing need, it is considered that the shortfall in housing supply is unable to be addressed through the existing spatial strategy as specified in Surrey Heath's Core Strategy, 2012. In completing the next iteration of the SLAA, the Council will need to have consideration for the developing spatial strategy contained within the draft new Local Plan. Accordingly, the next section of this report considers how any residual unmet housing need could be addressed through the Borough's plan making.



## **5 Current approach to meeting residual unmet housing need & exceptional circumstances**

### **5.1 Introduction**

5.1.1 To inform the plan-making process, consideration has been given in respect of how any residual unmet need could be addressed, including whether overriding exceptional circumstances exist to warrant an alteration to Green Belt boundaries. In determining whether exceptional circumstances exist, the Council has given consideration to national planning policy, case law, a range of evidence base documents and work conducted under the duty to cooperate. Each of these have been summarised below.

### **5.2 Exceptional Circumstances in National Planning Policy**

5.2.1 Paragraph 83 of the NPPF (2012) indicates that local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

5.2.2 In February 2017, the Government published a Housing White Paper, 'Fixing our broken housing market'. The White Paper recognised that whilst the National Planning Policy Framework is already clear that Green Belt boundaries should be amended only "in exceptional circumstances" when plans are being prepared or revised, it does not define what those circumstances are. As such, the Government proposed to amend and add to national policy to make clear that authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including:

- making effective use of suitable brownfield sites and the opportunities offered by estate regeneration;
- the potential offered by land which is currently underused, including surplus public sector land where appropriate;
- optimising the proposed density of development; and
- exploring whether other authorities can help to meet some of the identified development requirement.

5.2.3 In March 2018, the Government published a consultation on a draft revised National Planning Policy Framework, which incorporates policy proposals previously identified within the Housing White Paper. The draft revised version of the National Planning Policy Framework adds to the existing national policy to indicate that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries:

*“the strategic plan-making authority should have examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of the plan, which will take into account... whether the strategy;*

*a) makes as much use as possible of suitable brownfield sites and underutilised land;*

*b) optimises the density of development, including whether policies promote a significant uplift in minimum density standards in town and city centres, and other locations well served by public transport; and*

*c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground”*

### **5.3 Case Law**

5.3.1 In the absence of criteria set down in national planning policy to demonstrate exceptional circumstances, an increasing amount of case law has developed as a result of individual authorities’ efforts to justify revisions to their Green Belt boundaries. One of the most established cases in this respect is that of *Gallagher Homes Limited v Solihull Metropolitan Borough Council*. The decision established the following points:

- Planning guidance is a material consideration for plan-making and decision-taking. However, it does not have statutory force: the only statutory obligation is to have regard to relevant policies;
- It is not arguable that the mere fact that a local authority is drawing up its local plan is itself an exceptional circumstances justifying a boundary change;
- Exceptional circumstances are required for any revision to a Green Belt boundary, whether the proposal is to extend or diminish the Green Belt.
- Whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgement, what is capable of amounting to exceptional circumstances is a matter of law, and a plan-maker may err in law if they fail to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established, it requires more than general planning concepts to justify alterations.

5.3.2 In respect of housing need as an exceptional circumstance, the cases of *Hundal v South Buckinghamshire District Council*, *Grand Union Investments Ltd v Dacorum BC* and *Calverton Parish Council v Nottingham City Council* all clarify that housing need can be capable of justifying a change to Green Belt boundaries. However, in each instance it is clear that it is not housing need alone, but the wider spatial requirements of an authorities’ area through which an exceptional case can be established.

5.3.3 Amplifying this issue particularly clearly is the case of *Calverton Parish Council v Nottingham City Council*. The case established that exceptional circumstances may

be identified through appropriate consideration of both the acuteness/intensity of housing need and the inherent constraints on supply/availability of land suitable for sustainable development in addition to the consequent difficulties in achieving sustainable development without impinging on the Green Belt, the nature and extent of the harm to this Green Belt and the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.

## **5.4 Evidence Based Work**

5.4.1 Surrey Heath has undertaken a broad range of evidence based work in order to inform the development of the emerging Surrey Heath Local Plan, including (but not limited to) the following:

- Strategic Land Availability Assessment 2017;
- Strategic Housing Market Assessment 2016;
- Employment Land Review 2016;
- Surrey Heath Retail Study 2007 and Retail Study Update 2010;
- Draft Gypsy and Traveller Accommodation Assessment 2018;
- Indoor Facilities Assessment and Strategy (2016);
- Open Space Assessment and Standards Paper (2016);
- Playing Pitch Strategy Assessment and Strategy (2016);
- Green Belt and Countryside Study (2017);
- SA/SEA (2018).

5.4.2 Cumulatively, these documents have built a robust understanding of the Borough's emerging development needs. The evidence clearly indicates that Surrey Heath is capable of meeting its needs for retail and employment within existing settlement areas and on previously developed sites within the Countryside and Green Belt. However, the evidence also indicates that whilst the Council has taken significant efforts to endeavour to meet its housing need within existing settlement areas and on previously developed sites within the Countryside and Green Belt, there remains an acute shortfall of 731 dwellings against the Council's identified housing need across the Plan period, taking into account the need to safeguard existing sport and recreation facilities and outdoor space (such as Parks) within settlement areas. The evidence has also demonstrated an unmet need in respect of Gypsy and Traveller Accommodation.

5.4.3 The Council has also undertaken a Green Belt and Countryside Study. The purpose of the Study was to identify how land designated as Green Belt and Countryside within Surrey Heath functions against the purposes of the Green Belt as set out within Paragraph 80 of the National Planning Policy Framework. The Study established that nearly all of the Green Belt and Countryside within Surrey Heath currently functions against at least one of the Purposes of the Green Belt. The only areas that were identified as not functioning against the Green Belt were located within areas of the washed over Green Belt settlement area of Chobham. The SLAA (2017) identifies a number of potential housing sites within the Green Belt. The principle of the residential development of some of these sites is already considered



acceptable, owing to their potential capacity to constitute rural exception sites or as a result of their previously developed status.

## **5.5 Joint working between Hart, Rushmoor and Surrey Heath**

- 5.5.1 A commitment to joint working between Hart and Rushmoor has been enshrined in the Statement of Common Ground recently completed between the three authorities to underpin the Rushmoor Local Plan. This recognises that in the event that Surrey Heath has demonstrated that it is unable to eliminate any remaining shortfall, and the Housing Market Area partners are satisfied that Surrey Heath has taken all reasonable steps to meet its own share of the housing need, the three authorities will work together to ensure that the shortfall is addressed elsewhere within the HMA.
- 5.5.2 All three authorities are confident that this is achievable. Surrey Heath recognises that whilst the Hart Local Plan Proposed Submission Version consultation document provides for a lesser quantum of development than set out in the Draft Hart Local Plan Regulation 18 consultation document, the consultation proposes a notably higher amount of housing than the indicative Government figures for Hart and that a commitment is made within the plan to identify a new settlement at Murrell Green/Winchfield, in order to meet longer term development needs. Hart's Duty to Cooperate Paper (prepared to accompany the Hart Local Plan Proposed Submission Version consultation document) also reflects a commitment to address unmet housing needs within the HMA. Furthermore, it is noted that the housing need figures for all three authorities have decreased under the proposed standard methodology and the HMA as a whole is on track to exceed the indicative housing need figures as set out in the Government's consultation.
- 5.5.3 It is noted that proposed changes set out within the draft revised National Planning Policy Framework replace the requirement for needs to be met across Housing Market Areas with a less-defined approach requiring any Authorities' unmet needs to be addressed in 'neighbouring areas'. Notwithstanding this, it is considered that the Hart, Rushmoor and Surrey Heath Housing Market Area remains the most appropriate area in which any unmet need arising from Surrey Heath should be met, given the strong functional linkages between the Authority areas and the work already undertaken to date, which has been well developed through the duty to cooperate. It is also noted that through work undertaken as part of the Duty to Cooperate Surrey Heath has established that many of its neighbouring areas outside the HMA are unable to assist Surrey Heath in meeting any shortfall against its housing need, given their own land use constraints.

## **5.6 Surrey Heath's Position**

- 5.6.1 As set out above, there is no formal definition or criteria to demonstrate exceptional circumstances; it is for the Council to determine whether it considers exceptional circumstances exist to justify amending Green Belt boundaries through the Surrey Heath Local Plan. As case law has demonstrated, exceptional circumstances can be best demonstrated where a number of factors come together to make a

compelling case. The Council has now weighed up all available evidence and information and sets out the Council's position below accordingly.

- 5.6.2 In respect of the expansion of Green Belt boundaries, it is recognised that nearly all designated Countryside beyond the Green Belt situated adjacent to the Green Belt is already afforded a significant degree of protection through designation as a Special Area of Conservation, Special Protection Area and Site of Special Scientific Interest; as such it is not considered that the Council could demonstrate the necessity for a Green Belt extension in this location. Nor is it considered that there have there been any major changes in circumstances that make the adoption of this measure necessary. It is not therefore considered that the Council has sufficient grounds to expand Green Belt boundaries.
- 5.6.3 In terms of whether there are exceptional circumstances to warrant a contraction of Green Belt boundaries, it is recognised that the Borough has an acute level of unmet housing need. It is also evident that there are sites available for residential development within the Green Belt and that some areas of the Green Belt do not function (or function poorly) against the purposes of the Green Belt.
- 5.6.4 However, emerging policy set out within the draft revised NPPF is clear that Councils should establish whether neighbouring authorities could accommodate some of the identified need for development before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries. Work undertaken through the Duty to Cooperate indicates that there is significant potential for any demonstrated unmet need arising from Surrey Heath to be accommodated within neighbouring areas, as set out within the Statement of Common Ground recently completed between Hart, Rushmoor and Surrey Heath to underpin the Rushmoor Local Plan.
- 5.6.5 As such it is considered that given any unmet need arising from Surrey Heath could feasibly be accommodated within neighbouring areas that have strong functional linkages to the Borough and without recourse to releasing Green Belt, the Council considers that the acuteness of the Borough's housing need is diluted to such a degree that it cannot be considered that a compelling case to contract Green Belt boundaries exists.
- 5.6.6 Notwithstanding this, the Council recognises that there remains a significant shortfall against the Council's identified housing need and that efforts to further reduce the shortfall need to be sustained throughout the remainder of the plan-making process, despite the fact that any demonstrated unmet need arising from Surrey Heath could realistically be accommodated elsewhere in the Housing Market Area.
- 5.6.7 Surrey Heath will continue to keep Hart District Council and Rushmoor Borough Council informed of any changes to the Borough's unmet need throughout the remainder of the Plan-making process, with a view to ensuring that by the time of the Publication of the Surrey Heath Local Plan (Regulation 19) Proposed Submission Version, all Authorities are satisfied that Surrey Heath has taken all reasonable steps to deliver its identified housing need.

## 6 Next Steps

### 6.1 Introduction

- 6.1.1 As noted in Paragraph 5.6.7, the Council recognises that there remains a significant shortfall against the Councils identified housing need and that efforts to further reduce the shortfall need to be sustained throughout the remainder of the plan-making process, even if the Borough's neighbouring authorities have indicated that there is significant potential for any demonstrated unmet need arising from Surrey Heath to be accommodated within them. Set out below are the work programmes that the Council is intending to progress in order to ensure that in order to ensure that every reasonable opportunity to meet the Borough's own housing need has been fully explored.

### 6.2 Call for Sites 2018 & 2019

- 6.2.1 The Council will undertake an open Call for Sites in Spring 2018, which will run alongside the consultation on the Issues and Options draft of the Local Plan. A further Call for Sites is expected to take place in mid-2019. The purpose of these exercises will be, as before, to develop an up-to-date understanding of the availability, suitability and deliverability of development land within the Borough, including land for housing. This will provide an opportunity for the Council to identify new sites available for development that may be able to reduce the Council's shortfall against its housing targets.

**Aim: Planning Policy and Conservation will undertake an open Call for Sites in Spring 2018 and mid-2019; any new sites identified through the Call for Sites process will be considered for their development potential through the preparation of 2018 and 2019 Strategic Land Availability Assessments.**

### 6.3 Public Sector Land

#### *One Public Estate*

- 6.3.1 Whilst initial work through the One Public Estate programme indicated that Frith Hill, Deepcut is required for operational purposes and is not available for residential development, the Council continues to work with the Defence Infrastructure Organisation through the One Public Estate programme to explore opportunities for development at Barossa Common, Camberley, subject to the outcomes of a review of operational needs on the site which is being undertaken during 2018. If following the review of operational needs the site is identified as being available for development, the site may have the potential to deliver residential development.
- 6.3.2 A high level study undertaken by Land Use Consultants in respect of the potential residential capacity of the site recognises that the northwest and northeast of Barossa Common are within the Thames Basin Heaths Special Protection Area 400m buffer and are therefore unsuitable for residential development. This accounts for nearly 60% of the total site area. The remainder of the site could accommodate

in the region of 345 units at 30 dwellings per hectare, subject to a more detailed assessment of the site, including the potential impact upon the Royal Military Academy Site of Nature Conservation Importance (SNCI), deciduous woodland priority habitat and notably, whether it would be appropriate to utilise land within the 400m buffer zone as on-site SANG. The establishment of SANG within the 400m buffer zone may not always be possible, owing to the increased potential for users of the SANG to access the SPA. If therefore, following assessment this was not deemed appropriate, the capacity of the site would be limited to no more than 99 units to reflect the approach to mitigation set out in the Thames Basin Heaths SPA SPD.

- 6.3.3 In view of the potential constraints affecting the site, it may be appropriate to consider (subject to availability) whether the site has capacity to accommodate alternative uses which are less sensitive in respect of the Thames Basin Heaths SPA. In particular, the site may have capacity to accommodate other types of uses relocated from elsewhere in the Borough, including health, leisure or civic facilities. This could allow for the release of public and privately owned land in less constrained locations for residential development.

**Aim: The Council's work through the One Public Estate programme in respect of Barossa Common will continue through 2018 and early 2019 and any relevant outcomes can be taken into account in the production of the Surrey Heath Local Plan (Regulation 19) Proposed Submission Document.**

*Co-location of services*

- 6.3.4 As noted in Paragraph 4.2.8, the Council has in recent years pioneered the co-location of services in the Borough, which has led to the unlocking of other land in public ownership for residential development.
- 6.3.5 At the time of the preparation of the 2017 Strategic Land Availability Assessment, the Council Estates and Asset Manager confirmed that whilst the Council continues to explore opportunities to co-locate services and unlock land for development, at the present time there are no such schemes in the pipeline. This remains correct at the time of the preparation of this report.

**Aim: Planning Policy and Conservation will engage with the Council's Estates and Assets Manager on a quarterly basis throughout the remainder of the plan-making process to obtain updates in respect of any emerging opportunities to unlock land for development through the co-location of services. The suitability and achievability of any sites subsequently identified through this work will be considered through future SLAA exercises to be undertaken in Summer 2018 and 2019.**

*Surrey Heath Borough Council and Surrey County Council Land and Assets*

- 6.3.6 Discussions will continue to be undertaken with both the Surrey Heath Estates and Assets Management Team and Surrey County Council to obtain an up-to-date record of any Council owned sites that may be available for residential development.



**Aim: Planning Policy and Conservation to engage with the Council's Estates and Assets Manager and Surrey County Council on a quarterly basis throughout the remainder of the plan-making process to obtain updates in respect of any emerging opportunities to identify any public sector land that may be available for residential development. The suitability and achievability of any sites subsequently identified through this work will be considered through future SLAA exercises to be undertaken in Summer 2018 and 2019.**

#### *Other Public Sector Sites*

- 6.3.7 The Council will continue to be proactive in communicating with other public sector bodies including, but not limited to the NHS, Ministry of Defence and the HM Prison and Probation Service to explore opportunities to identify other under-used public sector sites that may be available for residential development.

**Aim: Planning Policy and Conservation to write to a range of other public sector bodies including the NHS, Ministry of Defence and the HM Prison and Probation Service as part of Call for Sites exercises undertaken in 2018 and 2019. The suitability and achievability of any sites subsequently identified through this work will be considered through future SLAA exercises to be undertaken in Summer 2018 and 2019.**

## **6.4 Underutilised Employment Sites**

- 6.4.1 There remain in the Borough a small range of employment sites that are not functioning effectively in their current use and that are not considered to be required to meet future employment needs. Notwithstanding this, without certainty that the requisite landowners are willing to make such sites available for residential development, the Council does not consider that it is appropriate to include any such sites within its housing land supply. The Council will therefore continue to seek to engage the landowners of such sites with a view to identifying additional opportunities to accommodate residential development on underutilised employment sites.

**Aim: Planning Policy and Conservation to write to a the owners of employment sites considered to be functioning poorly and that are not considered to be required to meet future employment needs as part of Call for Sites exercises undertaken in 2018 and 2019. The suitability and achievability of any sites subsequently identified through this work will be considered through future SLAA exercises to be undertaken in Summer 2018 and 2019.**

## **6.5 Opportunities for Estate Regeneration**

- 6.5.1 Subsequent to the production of the Strategic Land Availability Assessment 2017, the Council has begun to explore opportunities with the Accent Group (as the Borough's largest Housing Association) to regenerate estates within Surrey Heath which could in turn help reduce the Council's shortfall against its housing target.

- 6.5.2 Accent Group and Surrey Heath Borough Council are in agreement that opportunities to regenerate estates within Surrey Heath are very limited. A number of extensive former Council estates have become fragmented by the Right to Buy, limiting viable opportunities for extensive renewal. It is also recognised that much of the Old Dean Estate falls within the 400m buffer zone of the Special Protection Area where no net increase in residential development will be permitted.
- 6.5.3 As a result it is not considered at this stage that there are any significant opportunities to reduce the Council's shortfall against its housing target provided by large scale estate regeneration in Surrey Heath.
- 6.5.4 Notwithstanding this, it is recognised that the Accent Group has in recent years embarked on a redevelopment programme focused on under-used land within existing estates, often comprising of underused garage and parking sites. Accent Group has indicated that there are other, similar sites that may have development potential but that the capacity of such interventions is often heavily constrained by their size and the potential for harm to arise to residential amenity.
- 6.5.5 Surrey Heath recognises these concerns and has committed to work with Accent Group to explore whether the capacity of any such sites could be increased by undertaking a joint asset mapping exercise during Spring/Summer 2018.

**Aim: Planning Policy and Conservation will undertake an asset mapping exercise with Accent Group in order to explore whether a greater quantum of development could be secured through the re-development of Accent Group owned sites. The suitability and achievability of any sites subsequently identified through this work will be considered through future SLAA exercises.**

## **6.6 Camberley Town Centre**

- 6.6.1 The Council has already taken steps to maximise the potential for the delivery of housing on identified sites within Camberley Town Centre. Notwithstanding this, the Council will continue to explore opportunities to maximise housing delivery within the town centre, including an assessment of the capacity of new residential development to be provided above shops and within rear service yards.

**Aim: Planning Policy and Conservation will undertake a scoping study in respect of the potential for Camberley Town Centre to accommodate additional residential development, liaising with landowners as appropriate. The suitability and achievability of any sites subsequently identified through this work will be considered through future SLAA exercises to be undertaken in Summer 2018 and 2019.**

## **6.7 Consideration of responses to the Draft Local Plan Issues and Options Consultation**

- 6.7.1 The Council will give consideration to any representations received in respect of the deliverability of any sites contained within the Draft Local Plan or the 2017 Strategic

Land Availability Assessment in response to the Draft Local Plan Issues and Options Consultation.

**Aim: Planning Policy and Conservation will give consideration to any representations received in respect of the deliverability of any sites contained within the Local Plan or the 2017 Strategic Land Availability Assessment in response to the Draft Local Plan Issues and Options Consultation, reassessing any identified sites as appropriate with the 2018 Strategic Land Availability Assessment.**