

Sustainability Appraisal (SA) of the Surrey Heath Local Plan

Interim SA Report

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Quality information

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1 Introduction

1.1 Background

- 1.1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Surrey Heath Local Plan. Once adopted, the Local Plan will set the strategy for growth and change for Surrey Heath borough up to 2038, allocate sites to deliver the strategy and establish the policies against which planning applications will be determined.
- 1.1.2 SA is a mechanism for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. SA is required for Local Plans.¹

1.2 SA explained

- 1.2.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.2.2 In-line with the Regulations, a report (known as **the SA Report**) must be published for consultation alongside the draft plan that essentially ‘identifies, describes and evaluates’ the likely significant effects of implementing ‘the plan, and reasonable alternatives’. The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.2.3 More specifically, the SA Report must answer the following **three questions**:
- What has Plan-making / SA involved up to this point?
 - including around consideration of ‘reasonable alternatives’
 - What are the SA findings at this stage?
 - i.e. in relation to the draft plan
 - What are next steps?

1.3 This Interim SA Report²

- 1.3.1 At this current stage of the plan-making process the Council is consulting on an early draft version of the Local Plan under Regulation 18 of the Local Planning Regulations.
- 1.3.2 This report is published with the intention of informing the consultation and subsequent preparation of the final draft (‘proposed submission’) version of the plan.

Structure of this report

- 1.3.3 Despite the fact that this is an ‘Interim’ SA Report, and does not need to provide the information required of the SA Report, it is nonetheless helpful to structure this report according to the **three questions** above.
- 1.3.4 Before answering the first question, there is a need to further set the scene by setting out:
- the plan’s aims and objectives; and
 - the scope of the SA.

Commenting on this report

- 1.3.5 This report can be referenced as part of comments on the draft plan and/or comments can be made specifically on any part of this report. Further guidance is provided below, including the next steps section.

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2021). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the ‘Proposed Submission’ plan document.

² See **Appendix I** for further explanation of the regulatory basis for answering certain questions within the SA Report, and a ‘checklist’ explaining more precisely the regulatory basis for presenting certain information.

2 Plan aims and objectives

2.1 Introduction

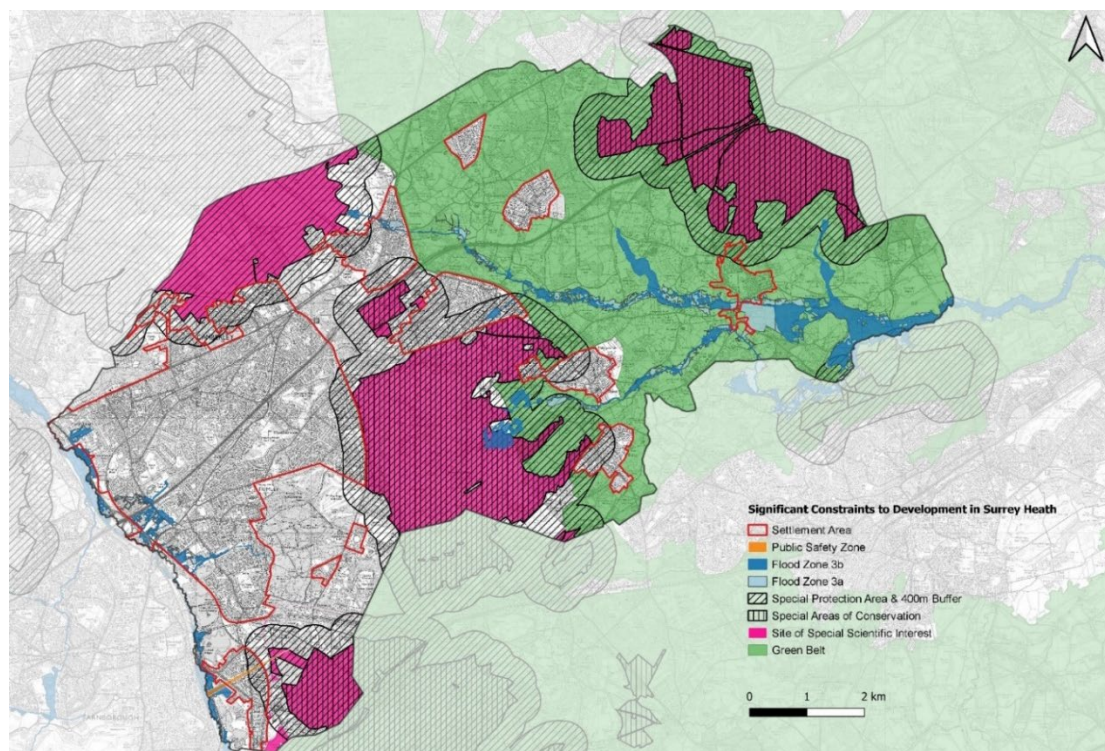
2.1.1 The aim here is to briefly introduce: the plan area (drawing text from the plan document, and mindful that spatial issues and opportunities are discussed in more detail elsewhere in this report); the legislative and policy context; and the objectives that are in place to guide plan preparation (the 'plan scope').

2.2 The plan area

2.2.1 Surrey Heath lies in the north west corner of Surrey and adjoins the counties of Berkshire and Hampshire. The north and east of the Borough are mainly areas of countryside and heathland which give the Borough its name. The Borough is relatively small, with an estimated population of 89,200 in 2020.

2.2.2 The London Metropolitan Green Belt stretches across the eastern half of the Borough, as far west as Bagshot, Lightwater and the component of the Thames Basin Heath Special Protection Area (TBHSPA) / MOD land / former common land that heavily constrains land to the east of the main urban area. The great majority of the western half of the Borough is either built-up or constrained by the TBHSPA, with only a relatively small area of Countryside Beyond the Green Belt (CBGB) falling outside of the TBHSPA 400m buffer zone, and much of this land is locally designate as a Site of Nature Conservation Importance (SNCI) and/or constrained by historic environment designations (Bagshot Park and Royal Military College).

Figure 2.1: Green Belt and headline environmental constraints



2.2.3 The western half of the Borough contains the Camberley / Frimley / Frimley Green urban area and the villages of Bagshot, Deepcut and Mytchett. The eastern half of the Borough is more rural, and includes the villages of Bisley, Chobham, Lightwater, West End and Windlesham. Bisley, West End and Windlesham are currently inset from the Green Belt.

2.2.4 The Borough lies within the Enterprise M3 Local Enterprise Partnership (EM3 LEP) area which stretches from the New Forest in the south to the perimeter of Heathrow Airport in the north. Camberley is the key population, retail, commercial and employment centre in the Borough and is identified as a 'step-up town' within the Strategic Economic Plan for the LEP area, i.e. as a town with economic potential experiencing current barriers to economic growth. Recent work on a Local Industrial Strategy for the LEP has identified both Camberley and Frimley as having an important role as population and employment centres.

- 2.2.5 Surrey Heath also lies within the Blackwater Valley, comprising authorities from parts of Berkshire, Hampshire, and Surrey based along the A331 Blackwater Valley Road and River Blackwater. There are important economic and functional relationships between the main urban settlements which together form the Blackwater Valley area and Camberley is one of the largest towns in the Valley.
- 2.2.6 The Borough also lies within a Housing Market Area (HMA) and Functional Economic Area (FEA) with Hart District and Rushmoor Borough.³ Major towns around the Borough include Bracknell to the north (well connected to Surrey Heath by road), Woking to the east (closely linked to Surrey Heath), Guildford to the south east (well linked by rail), Aldershot and the Blackwater Valley settlements to the south (closely linked), Basingstoke to the west (via the M3) and Reading to the north west (well linked by rail).
- 2.2.7 The majority of employment floorspace is located in Camberley and Frimley at three large business parks and five industrial estates. There are also four single occupancy sites that are home to major businesses; one located in Frimley, one near Mytchett, and two near the rural settlement of Windlesham. Fairoaks Airport in Chobham also provides employment use within the local area.
- 2.2.8 Good access to key employment areas, including Farnborough, Reading, Heathrow and London, means that the Borough sees net out-commuting. Surrey Heath is served by three rail stations at Bagshot, Camberley and Frimley with trains operating on a branch line service between Ascot and Guildford. All three stations have poor access to London Waterloo. Many commuters living in Surrey Heath therefore use nearby faster services from stations outside the Borough at Farnborough, Woking and Sunningdale.
- 2.2.9 As well as employment, Camberley is also the primary hub for provision of community services and facilities, and the Council has identified the delivery of an improved Camberley town centre as a priority. As part of this, the Council has pro-actively delivered a number of improvements including the acquisition and improvement of town centre property, and significant public realm enhancements. The redevelopment of a 5.5 acre site at London Road remains the single biggest regeneration opportunity in the town centre.
- 2.2.10 Aside from Camberley town centre, Bagshot and Frimley benefit from a district centre, and there are also a number of local centres and neighbourhood parades in the Borough. The most significant out-of-centre retail exists at Bagshot retail park, while the Meadows retail park is just outside the Borough.
- 2.2.11 In the Indices of Multiple Deprivation 2019, Surrey Heath is ranked as the 9th least deprived local authority in England. However, this masks pockets of much higher levels of relative deprivation, with the three worst performing areas associated with different locations within the western urban area.
- 2.2.12 Finally, as part of this initial discussion seeking to briefly introduce the plan area, there is a need to note the large residential scheme currently under construction at the former Princess Royal Barracks in Deepcut (Mindenhurst). This will deliver around 1,200 dwellings and associated infrastructure.

2.3 The plan period

- 2.3.1 The duration of the plan is for 19 years from 1st April 2019 to 31st March 2038. The previous proposal, at the Issues and Options/Preferred Options stage (2018), was to plan for a 16 year period from 2016 to 2032, but it is good practice to plan for a longer time horizon where possible as stipulated within the NPPF:
- “Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments... form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years)...”*

2.4 Legislative and policy context

- 2.4.1 The plan is being prepared under the Town and Country (Local Planning) Regulations 2012, must reflect current Government policy as set out in the NPPF (2021) and must also be prepared in accordance with Government’s online Planning Practice Guidance (PPG). In particular, the NPPF requires local authorities to take a positive approach to development, with an up-to-date local plan that meets objectively assessed needs, including local housing needs (LHN), as far as is consistent with sustainable development.

³ The HMA was confirmed by the Hart, Rushmoor and Surrey Heath Strategic Housing Market Assessment (SHMA, 2016) and the FEA is discussed as a key geography in the Employment Land Technical Paper Update (2019). Both geographies are discussed within the Government’s Planning Practice Guidance (PPG), including for [effective cooperation](#) and [economic need](#).

- 2.4.2 The plan is also being prepared taking account of objectives and policies established by various organisations at national and local levels, in accordance with the Duty to Cooperate established by the Localism Act 2011. For example, context is provided by policy/strategy established by the Enterprise M3 LEP and Surrey County Council (most notably in relation to transport, minerals, waste and education). Surrey Heath Borough also cooperates with neighbouring areas including Bracknell Forest, Windsor and Maidenhead, Runnymede, Woking, Guildford, Rushmoor and Hart.
- 2.4.3 Finally, it is important to note that the plan will be prepared mindful of the 'made' Windlesham Neighbourhood Development Plan (NDP) and the emerging NDPs for Deepcut and Chobham. NDPs must be in general conformity with the Local Plan, which means that made and emerging NDPs may need to be reviewed to bring them into line with the emerging plan; however, it is equally the case that made and emerging NDPs will be a consideration when preparing the Local Plan.

2.5 Plan objectives

- 2.5.1 The current Draft Plan consultation document presents a list of objectives to guide plan preparation, and these are an important starting point when giving consideration to the issues and alternative options ('reasonable alternatives') that should be a focus of SA. The plan objectives are as follows:
1. Deliver sustainable development that contributes to meeting **housing** needs, providing new homes of an appropriate housing mix and tenure, including specialist housing needs.
 2. Protect Strategic and Locally important **employment** sites to ensure an appropriate supply of employment land to help fulfil the Borough's role in facilitating strong economic performance within the Functional Economic Area (Hart, Rushmoor and Surrey Heath) and wider EM3 LEP area.
 3. Enhance the vitality and viability of **Camberley Town Centre** and the other District and Local centres within the Borough.
 4. Ensure that development within the Borough is supported by the necessary physical, social and green **infrastructure** to meet the needs of Surrey Heath residents.
 5. Ensure that development does not have a detrimental impact on the Borough's **environmental assets** including designated international and national sites, landscape character, water quality and biodiversity and that new development provides for biodiversity and environmental net gains.
 6. Ensure that new development minimises or mitigates the impact of development on air quality, noise, light pollution, odours, emissions and particulates [**environmental quality**].
 7. Ensure that new development, unless appropriate under the Exceptions Test, is not located in areas of high or medium risk of **flooding** and that development does not increase surface water run-off.
 8. Support action on **climate change** and reduction of the Borough's carbon emissions, aiding the transition to net zero through a combination of **mitigation and adaptation** measures, including the appropriate delivery of opportunities for renewable energy, energy efficiency and improving resilience to the impacts of climate change.
 9. Protect the character and purpose of the **Green Belt** and the character of the Countryside beyond the Green Belt.
 10. Conserve and enhance the Borough's **built environment and heritage assets**, both designated and non-designated.
 11. Promote healthy, sustainable and cohesive local **communities** through good design and access to homes, employment, community and recreational facilities.
 12. Support measures that prioritise **active and sustainable travel** modes including improved facilities for pedestrians and cyclists and improvements to public transport

A strategic plan

- 2.5.2 It is important to recognise that the Local Plan will be strategic in nature, and hence omit consideration of some detailed issues in the knowledge that they can be addressed at subsequent stages of the planning process, principally the planning application stage. For example, it is appropriate to defer certain detailed matters relating to masterplanning and design of development sites to the planning application stage.
- 2.5.3 The scope of the Local Plan is reflected in the scope of the SA (discussed in the following section).

3 The SA scope

3.1 Introduction

- 3.1.1 The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the assessment of reasonable alternatives and the emerging plan. It does not refer to the scope of the plan (discussed above) or the scope of reasonable alternatives (discussed below, in Part 1).
- 3.1.2 The aim here is to introduce the reader to the *broad scope* of the SA. **Appendix II** presents further information; however, it is not possible to define the scope of the SA comprehensively. Rather, there is a need for the SA scope to be flexible and adaptable, responding to the nature of the emerging plan and reasonable alternatives, and the latest evidence-base.

3.2 Consultation on the scope

- 3.2.1 The Strategic Environmental Assessment (SEA) Regulations 2004 require that: “*When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA scope], the responsible authority shall consult the consultation bodies.*” In England, the consultation bodies are the Environment Agency, Historic England and Natural England.⁴ As such, these authorities were consulted on the SA scope in 2017.
- 3.2.2 The outcome was an SA ‘framework’ comprising **26 objectives** grouped under **5 topics**. The framework was then used to structure the appraisal presented in the 2018 Interim SA Report published as part of the Issues and Options/Preferred Options consultation. No comments were received on the SA scope.

3.3 The SA framework

- 3.3.1 At the current time, in the view of AECOM, it is appropriate to rationalise the SA framework by grouping the **26 objectives** under **13 topics** and using this list of topics as the primary ‘level’ of the framework. This is appropriate with a view to ensuring the appraisal is suitably structured, concise and accessible.
- 3.3.2 Table 3.1 presents the list of 26 objectives (from the 2017 scoping stage) grouped under the new list of 13 topic headings. Some objectives appear under more than one topic heading (‘cross-cutting’).

Table 3.1: The SA framework

Topic	Objectives
Accessibility [to community infrastructure]	<ul style="list-style-type: none"> • Improve opportunities for access to education, employment, recreation, health, community services and cultural opportunities for all sections of the community • Sustain and enhance the viability and vitality of town, district and local centres • Improve the education and skills of the local population • Maintain and improve cultural, social and leisure provision
Air / env quality	<ul style="list-style-type: none"> • Ensure air quality continues to improve in line with national and/or WHO global targets • Reduce noise pollution
Biodiversity	<ul style="list-style-type: none"> • Conserve and enhance the Borough’s biodiversity • Ensure the protection of the Special Protection Areas (SPAs)

⁴ In-line with Article 6(3) of the SEA Directive, these bodies were selected because “*by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.*”

Topic	Objectives
Climate change adaptation ⁵	<ul style="list-style-type: none"> • Minimise the risk of flooding • Encourage reduced water consumption
Climate change mitigation ⁶	<ul style="list-style-type: none"> • Reduce greenhouse gas emissions • Increase energy efficiency and increase the use of renewable energy • Encourage the use of more sustainable modes of transport (active and public) and reduce traffic congestion
Communities and health ⁷	<ul style="list-style-type: none"> • Improve the population's health • Improve the education and skills of the local population • Reduce crime, fear of crime and social exclusion • Encourage the enjoyment of the countryside, open spaces and local biodiversity • Sustain and enhance the viability and vitality of town, district and local centres
Economy and employment	<ul style="list-style-type: none"> • Support inclusive and diverse economic growth • Maintain stable levels of employment in the Borough • Support existing business structure and businesses • Sustain and enhance the viability and vitality of town, district and local centres
Heritage	<ul style="list-style-type: none"> • Protect and where appropriate enhance the landscape, buildings, sites and features of archaeological, historical or architectural interest and their settings
Housing	<ul style="list-style-type: none"> • Meet identified housing need
Landscape	<ul style="list-style-type: none"> • Protect and where appropriate enhance the landscape, buildings, sites and features of archaeological, historical or architectural interest and their settings • Maintain and enhance the quality of countryside, Green Belt and open space areas
Land, soils and resources	<ul style="list-style-type: none"> • Make the best use of previously developed land (PDL) and existing buildings • Reduce contamination and safeguard soil quality and quantity • Reduce generation of waste and maximise re-use and recycling
Transport	<ul style="list-style-type: none"> • Encourage the use of more sustainable modes of transport (public transport/cycling/walking) and reduce traffic congestion
Water	<ul style="list-style-type: none"> • Maintain and improve the quality of water resources • Encourage reduced water consumption

⁵ There are wide-ranging further climate change adaptation considerations, as discussed in *Addressing climate change through the Surrey Heath Local Plan* (AECOM, 2020), including the climate change risk assessment in [Appendix 1](#) of the report.

⁶ There are wide-ranging further climate change mitigation considerations, as discussed in *Addressing climate change through the Surrey Heath Local Plan* (AECOM, 2020), including the review of links to NPPF policy in [Section 6](#).

⁷ The aim here is to discuss considerations over-and-above matters relating to access to community infrastructure, which are a stand-alone focus of discussion under the earlier Accessibility heading, and mindful of the subsequent Housing topic heading.

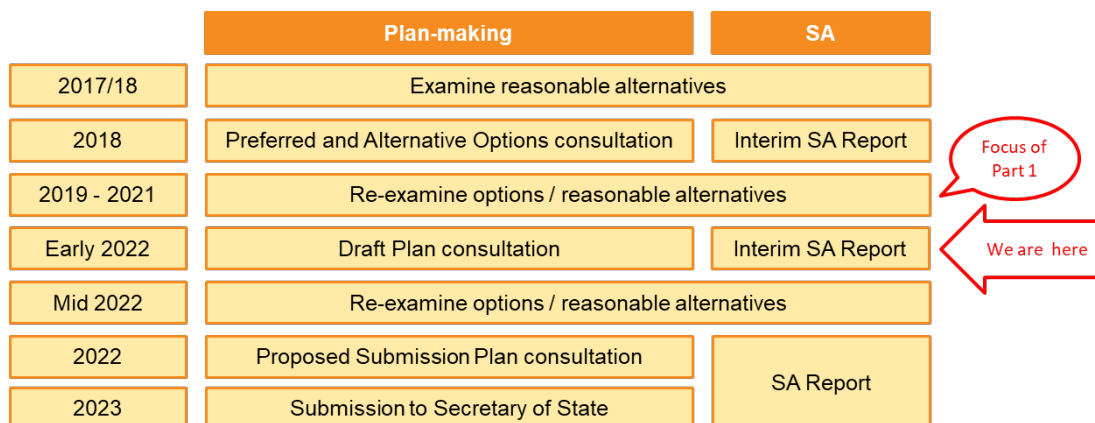
Part 1: What has plan-making / SA involved up to this stage?

4 Introduction to Part 1

Overview

- 4.1.1 Plan-making has been underway since 2017, with one consultation having been held prior to this current consultation, and one Interim SA Report having been published - see Figure 4.1.

Figure 4.1 Overview of the plan-making / SA process



- 4.1.2 The focus here, within Part 1, is not to relay the entire 'backstory' of the plan-making /SA process, or to provide a comprehensive audit trail of decision-making over time. Rather, the aim is to report work undertaken to examine **reasonable alternatives** in 2021. Specifically, the aim is to:

- explain the reasons for selecting the alternatives dealt with - see **Section 5**
- present an appraisal of the reasonable alternatives - see **Section 6**
- explain the Council's reasons for selecting the preferred option - see **Section 7**

- 4.1.3 Presenting this information is in accordance with the regulatory requirement to present an appraisal of 'reasonable alternatives' and 'an outline of the reasons for selecting the alternatives dealt with' within the SA Report (N.B. this is not the SA Report, but aims to present the information required of the SA Report).

What about earlier stages of SA?

- 4.1.4 A considerable amount of work was completed and published for consultation in the 2018 Interim SA (ISA) Report, including work to explore reasonable alternatives. For example, and notably, the report (Appendix B) appraised the option of meeting needs through brownfield only versus also allowing loss of greenfield.
- 4.1.5 Earlier work provided a key input to the process of establishing reasonable alternatives in 2021 and, as such, is discussed further below. However, findings of earlier work stages naturally become out-of-date and superseded, such that there is little to be gained from reporting findings in full at the current time.

Reasonable alternatives in relation to what?

- 4.1.6 The legal requirement is to examine reasonable alternatives (RAs) taking into account the objectives of the plan (see Section 2). Following discussion of plan objectives with officers, it was determined appropriate to focus on the spatial strategy, i.e. providing for a supply of land, including by allocating sites and potentially broad areas (NPPF paragraph 68), to meet objectively assessed needs and wider plan objectives. Establishing a spatial strategy is clearly an overarching objective of the Local Plan.⁸
- 4.1.7 The decision was made to refer to the spatial strategy alternatives as **growth scenarios**.

⁸ It was also considered appropriate to focus on 'spatial strategy' given the potential to define "do something" alternatives that are meaningfully different, in that they will vary in respect of 'significant effects'. This approach is in line with the SEA Regulations, and the PPG is clear that SA "should only focus on what is needed to assess the likely significant effects of the plan". There is also nothing to be gained by defining a 'reasonable alternative' that equates to the baseline situation.

What about site options?

- 4.1.8 Whilst individual site options generate a high degree of interest, they are not RAs in the context of most Local Plans. Were a Local Plan setting out to allocate one site, then site options would be RAs, but that is rarely the case, and is not the case for the Surrey Heath Local Plan. Rather, the objective is to allocate a *package* of sites to meet needs and wider objectives, hence RAs must be in the form of alternative *packages* of sites, in so far as possible. Nonetheless, consideration is naturally given to the merits of site options as part of the process of establishing growth scenarios – see Sections 5.3 and 5.4.

Is the focus on housing sites?

- 4.1.9 Local Plans are tasked with meeting both housing and wider development needs, including in respect of employment land. However, establishing a supply of land to meet housing needs is typically a matter of overriding importance, such that it warrants being the focus of work to explore growth scenarios. Also, it is important to be mindful of the pragmatic need to minimise the number of ‘moving parts’ that are a focus of SA, to make the process manageable. Employment land needs and supply is discussed further below, as part of the process of arriving at growth scenarios, but the process can be described as ‘housing led’.

What about other aspects of the plan?

- 4.1.10 As well as establishing a spatial strategy, allocating sites etc., the Local Plan must also establish policy on thematic borough-wide issues as well as site-specific policies to guide decision-making at the planning application stage. Broadly speaking, these can be described as development management (DM) policies.
- 4.1.11 It is a challenge to establish DM policy alternatives that are genuinely reasonable.⁹ However, through discussion with Officers it was determined reasonable and appropriate to go through a process to explore this matter, which led to two sets of RAs being identified and appraised, specifically in respect of: 1) built environment decarbonisation; and 2) biodiversity net gain. Also, it was determined reasonable to explore RAs in respect of Chobham’s Green Belt status. **Appendices III and IV** present further information.

Structure of this part of the report

- 4.1.12 This part of the report is structured as follows:
- **Section 5** – explains a stepwise process leading to the definition of growth scenarios,
 - with supplementary analysis in **Appendix V**;
 - **Section 6** – presents an appraisal of the growth scenarios;
 - **Section 7** – presents a statement provided by SHBC Officers setting out a response to the appraisal.

Who’s responsibility?

- 4.1.13 It is important to be clear that: selecting reasonable alternatives is the responsibility of the plan-maker (SHBC), with AECOM acting in an advisory capacity; appraising the reasonable alternatives is the responsibility of AECOM; and selecting the preferred option is the responsibility of the plan-maker.

Commenting on this part of the report

- 4.1.14 Comments are particularly welcomed on:
- the decision to focus primarily on ‘growth scenarios’ (**this section**);
 - the growth scenarios selected, with reference to the process for defining these (**Section 5**);
 - the appraisal of growth scenarios (**Section 6**);
 - Officers’ reasons for supporting the preferred scenario (**Section 7**);
 - the process of defining and appraising DM policy alternatives (**Appendix III**);
 - the process of defining and appraising alternatives for Chobham (**Appendix IV**); and
 - the supplementary GIS analysis of site options that fed into Section 5 (**Appendix V**).

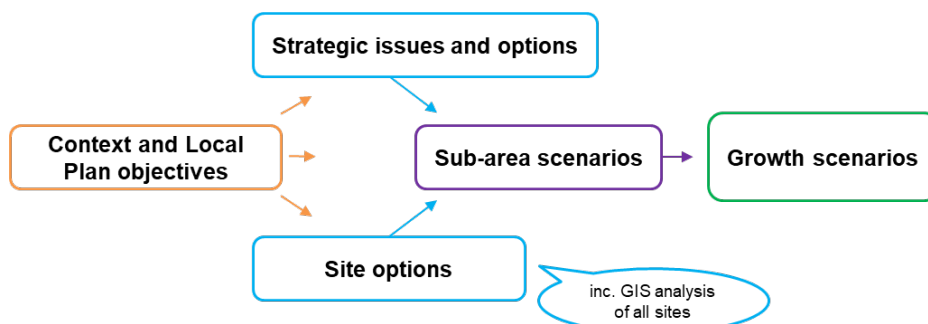
⁹ Recalling that to be ‘reasonable’ alternatives must be meaningfully different, to the extent that it is ultimately possible for an appraisal to confidently differentiate between the alternatives in terms of significant effects.

5 Defining growth scenarios

5.1 Introduction

5.1.1 The aim here is to discuss the process that led to the definition of reasonable growth scenarios.

Figure 5.1: Establishing reasonable growth scenarios



Structure of this section

5.1.2 This section of the report is structured as follows:

- **Section 5.2** – explores strategic issues and options with a bearing on growth scenarios;
- **Section 5.3** – considers individual site options with a bearing on growth scenarios;
- **Section 5.4** – explores growth scenarios for individual sub-areas within the Borough;
- **Section 5.5** – draws upon the preceding sections to define reasonable growth scenarios.

A note on limitations

5.1.3 It is important to emphasise that this section does not aim to present an appraisal of reasonable alternatives. Rather, the aim of this section is to describe the *process* that led to the definition of reasonable alternatives for appraisal. Further discussion of limitations is presented below.

5.2 Strategic issues and options

Introduction

5.2.1 The aim of this section of the report is explore the strategic issues and options with a bearing on the definition of reasonable growth scenarios. Specifically, this section of the report explores:

- Quantum – how many new homes are needed (regardless of capacity to provide them)?
- Distribution – which broad areas within the Borough are more suited and less suited to growth?

Quantum

5.2.2 This section sets out the established Local Housing Need (LHN) figure for the Borough, before exploring arguments for the Local Plan providing for a quantum of growth either above or below LHN.

Background

5.2.3 A central tenet of plan-making process is the need to **A**) establish housing needs; and then **B**) develop a policy response to those needs. The Planning Practice Guidance (PPG) explains:

“Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations.”

- 5.2.4 With regards to (A), the NPPF (paragraph 60) is clear that establishment of **LHN** should be informed by an “assessment conducted using the **standard method**... unless exceptional circumstances justify an alternative approach which also reflects... demographic trends and market signals” [emphasis added].
- 5.2.5 With regards to (B), many local authorities will respond to assessed LHN by providing for LHN in full or, in other words, setting a **housing requirement** that equates to LHN, and a **housing supply** through policies sufficient to deliver this housing requirement (at a suitable rate/trajectory over time, which will invariably necessitate putting in place a ‘buffer’ to mitigate against the risk of unforeseen delivery issues). However, under certain circumstances it can be appropriate to set a housing requirement that departs from LHN.

Surrey Heath’s LHN

- 5.2.6 A three-step standard method for calculating LHN was first published by the Government in 2017, and then a fourth step was added in 2020.¹⁰ This fourth step, known as the ‘cities and urban centres uplift’, does not have a bearing on the calculation of Surrey Heath Borough’s LHN.
- 5.2.7 There have also been some notable changes to guidance in respect of the data that should be utilised as an input to the standard method, since the method was first introduced. Specifically, following a consultation in late 2018, the PPG was updated to require that the household growth projections used as an input to the method must be the 2014-based projections, rather than more recent projections. The PPG explains that the change was made in order to:¹¹ “provide stability... ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government’s objective of significantly boosting the supply of homes.” Updates to the PPG in late 2020 confirmed this approach.
- 5.2.8 The standard method derived LHN for the Borough is currently **327 dwellings per annum**, or 6,213 homes in total over the plan period (2019–2038).¹² The Secretary of State for Levelling Up, Housing and Communities has indicated that the standard methodology will be reviewed in spring 2022.

Is it reasonable to explore setting the housing requirement at a figure below LHN?

- 5.2.9 Paragraph 11 of the NPPF states: “... strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, **unless**: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.” [emphasis added]
- 5.2.10 Aligned with this, Paragraph 010 of the PPG on Housing and Economic Needs Assessment explains: “... there will be circumstances where it is appropriate to consider [higher growth]... Circumstances where this may be appropriate include, but are not limited to situations where... an authority agreeing to take on unmet need from neighbouring authorities...”
- 5.2.11 Mindful of this context, and in light of the preferred spatial strategy set out in the Surrey Heath Issues and Options / Preferred Options consultation document (2018; also the evidence-base at the time, including an Interim Capacity Study, discussed below), the decision was made through the Hart Local Plan Examination in 2019/20 that the Hart Local Plan should make provision for unmet need from Surrey Heath. [Paragraph 90](#) of the Hart Local Plan explains that the housing requirement comprises LHN plus: “An additional 41 homes per annum... to address an unmet housing need in Surrey Heath...”
- 5.2.12 The precise unmet need figure has been the subject of continued discussion between the two Councils, culminating in a letter received on 21st December 2021 confirming that Hart District remains committed to delivering 41 dpa to contribute toward unmet need in Surrey Heath for the remainder of their plan period. This applies for the 13 years (2019-2032) covered by both plan periods, leading to 533 homes in total.
- 5.2.13 On this basis, there is a clear argument for setting the housing requirement at 6,213 – 533 = 5,680 homes, equivalent to **299 dwellings per annum** (dpa) on average over the plan period. This figure breaks down as 264 dpa up to 2032, to reflect the contribution from Hart District Council, and then 327 dpa for the remainder of the plan period, but it is appropriate to focus on the average (299 dpa). Moving forward, 299 dpa is discussed as a ‘adjusted average housing need’ figure for Surrey Heath over the plan period.

¹⁰ See [gov.uk/guidance/housing-and-economic-development-needs-assessments](https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments).

¹¹ See paragraph 4 and 5 at: [gov.uk/guidance/housing-and-economic-development-needs-assessments](https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments)

¹² This is a ‘capped’ figure, meaning that step 3 of the standard method (“Capping the level of any increase”) applies. Specifically, LHN is capped at 40% above the 191 dpa requirement in the adopted Local Plan (2012). The uncapped figure is 335 dpa.

Is it reasonable to explore higher growth scenarios?

- 5.2.14 As discussed above, Paragraph 010 of the PPG on Housing and Economic Needs Assessment sets out reasons for providing for 'above LHN' through Local Plans, explaining:

"The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area... ."

... Circumstances where [higher growth] may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of: growth strategies for the area that are likely to be deliverable... (e.g. Housing Deals); strategic infrastructure improvements that are likely to drive an increase in [need]; or an authority agreeing to take on unmet need from neighbouring authorities... There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need... are significantly greater than the outcome from the standard method."

- 5.2.15 However, in the Surrey Heath context there is little or no argument for exploring options involving providing for higher growth (i.e. above 299 dpa) on the basis of this guidance, broadly for two reasons:

- Firstly, the majority of the potential reasons for exploring higher growth do not apply to Surrey Heath. With regards to the matter of responding to a 'growth strategy', whilst it is recognised that Camberley is an important hub of economic activity in the sub-region (see paragraph 2.2.4), there is no identified higher housing growth opportunity. The Local Housing Needs Assessment (2020) explains: *"We have also calculated the population associated with Economic forecasts for Surrey Heath. These show housing need both below and above the standard methodology suggesting there is broad alignment..."*
- Secondly, with regards to unmet needs, whilst there is a risk of unmet needs arising from the east of Surrey, there is little or no reason to suggest that Surrey Heath is well placed to provide for any unmet needs that do arise. First and foremost, this is on the basis of the environmental constraints affecting the Borough (as discussed above and below). Secondly, this is on the basis of evidence that Surrey Heath lies within a different housing market area (HMA) to other Surrey authorities, including evidence from the Strategic Housing Market Assessment (SHMA, 2016). Specific considerations are as follows:
 - There is low risk of unmet needs arising from Surrey Heath's adjacent Local Authorities (Bracknell Forest, Windsor and Maidenhead, Runnymede, Woking, Guildford, Rushmoor and Hart), all of which either have an up-to-date adopted Local Plan that makes provision for housing needs, or an emerging draft Local Plan that is well-advanced and makes provision for needs.
 - Woking is a constrained borough that is unable to meet housing needs in full through its Local Plan, but the adopted Guildford and Waverley Local Plans make provision for the unmet need.¹³ It is recognised that Woking's current plan period is only to 2027, and there is currently no timetable for a Local Plan Review, leading to a risk of unmet needs arising from Woking beyond 2027; however, there is little reason to suggest that Surrey Heath would be well placed to provide for any such unmet needs, because of the environmental constraints that exist, including as shown in Figure 5.2.
 - With regards to the east of Surrey, there is likely to be unmet need arising from Mole Valley, following a recent draft plan consultation that proposed setting the housing requirement below LHN leading to a total unmet need of 1,750 homes over the 17 year plan period (see discussion under Policy S1 [here](#)). Also, it is recognised that the Elmbridge and Epsom and Ewell Local Plans are delayed, and that the adopted Reigate and Banstead Local Plan runs only to 2027 (with no timetable for a Local Plan Review). However, again, there is little or no reason to suggest a risk of the Surrey Heath Local Plan needing to provide for any unmet needs that arise, given the constraints that exist. A key point to note is that whilst Surrey Heath does have some countryside beyond the Green Belt (unlike the east of Surrey), this is limited in extent and heavily constrained, as discussed further below.

- 5.2.16 Finally, there is a need to consider affordable housing, with the PPG stating:¹⁴ *"An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes."* Affordable housing needs are explored in detail through the Housing Needs Assessment (2020), which finds that there is a total need for 246 affordable homes per annum (broken down into two categories), and concludes: *"These numbers are relatively high compared to overall need; this justifies the Council seeking to secure as much additional affordable housing as viably possible."*

¹³ Matters are explained within the recent Inspector's Report for the Woking Site Allocations DPD, see paragraph 40 [here](#).

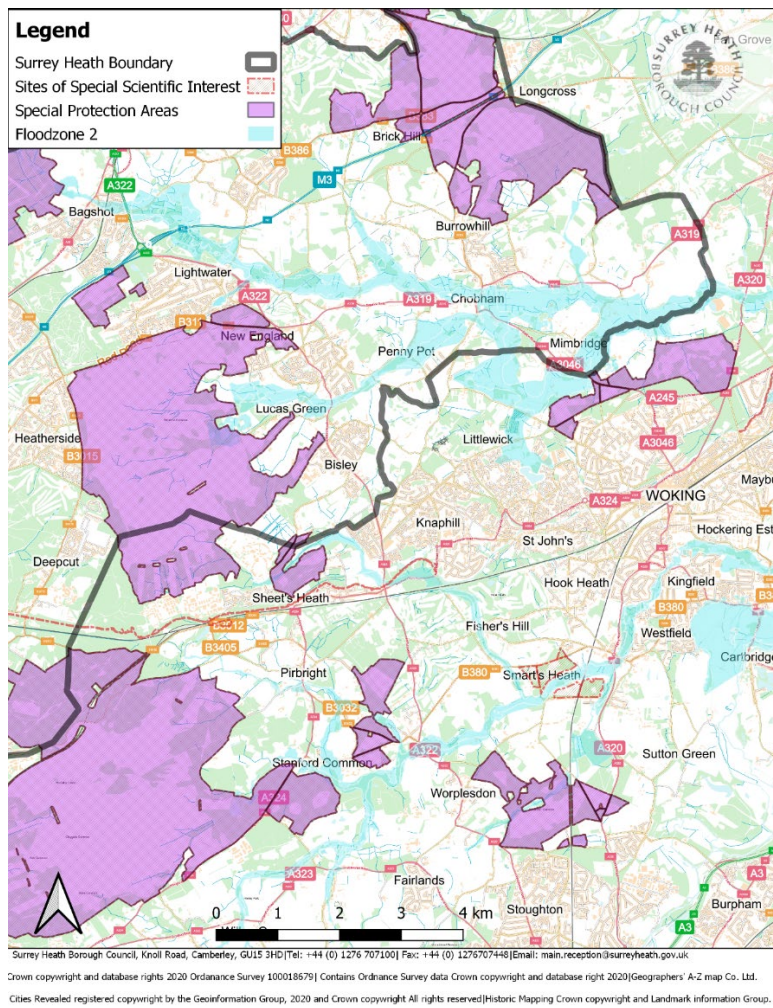
¹⁴ See paragraph 024 at: [gov.uk/guidance/housing-and-economic-development-needs-assessments](https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments)

5.2.17 The figure of 246 per annum amounts to 82% of the 299 dpa discussed above. There is no potential to deliver affordable housing as a proportion of market housing at this rate. However, there is potential to deliver affordable housing at a rate of perhaps 40% (subject to viability; see further discussion under the 'Housing' heading in Section 6). This serves as a reason to explore the possibility of higher growth scenarios, i.e. setting the housing requirement at a figure above 299 dpa. However, there is a need to be mindful that demand for market housing could become a limiting factor on affordable housing delivery.

Conclusion on housing quanta options to examine further

5.2.18 Surrey Heath Borough is in a somewhat unusual situation, in that the default option for the Local Plan is not to set the housing requirement at LHN (327 dpa), but rather an adjusted average housing need figure (299 dpa). This is due to the adopted Hart Local Plan providing for unmet needs from Surrey Heath. As such, reasonable growth scenarios should be primarily focused on providing for 299 dpa. Given the extent of Green Belt and SPA constraints there is also a clear justification for exploring lower-growth scenarios, subject to detailed consideration of capacity/supply options. With regard to higher growth scenarios, the constraints affecting Surrey Heath serve as a reason to suggest that these should be ruled out as unreasonable. However, the evidence on affordable housing needs (discussed above) serves as a reason for giving further consideration to the possibility of setting the housing requirement at a figure above 299 dpa. The matter of precise quanta figures to reflect is returned to within Section 5.5, subsequent to consideration of broad distribution options, site options and sub-area scenarios.¹⁵

Figure 5.2: Headline environmental constraints in the vicinity of Woking



¹⁵ It is important to reiterate that there is invariably a need to provide for a supply buffer over-and-above the housing requirement to ensure that the requirement is met in practice over the plan period (recognising that unforeseen issues with planned supply are inevitable), and ensure a robust supply trajectory, i.e. a situation whereby a five year housing land supply (5YHLS), as measured against the housing requirement, can be maintained throughout the entire plan period. The ideal situation involves a steady housing trajectory. However, under the Government's PPG, there is flexibility to set a 'stepped' housing requirement/trajectory, where there is evidence to demonstrate that this is necessary in light of wider sustainable development objectives. A stepped requirement/trajectory is one whereby the requirement is set at a level below the annualised total plan period housing requirement in the early years of the plan, and then this is compensated for in the latter years of the plan.

Broad distribution

Introduction

- 5.2.19 This is the second of two sections examining ‘strategic issues and options’ of relevance to the matter of defining reasonable growth scenarios for the Local Plan. This section explores evidence relevant to broad distribution in chronological order before reaching a broad conclusion on the key broad housing distribution issues and options that should feed into definition of the reasonable growth scenarios.

Interim Capacity Study (2018)

- 5.2.20 An appropriate starting point is the Interim Capacity Study prepared in April 2018, ahead of the Issues and Options / Preferred Options consultation, which sets out “*key environmental and policy constraints to housing delivery that affect the Borough.*” The study went through a stepped process in order to justify a decision to propose a spatial strategy involving a housing requirement for the plan period (and a potential land supply) *below* LHN, as discussed above at paragraph 5.2.11.

- 5.2.21 Section 3 of the study considers ‘constraints to residential development’ under the following headings:

- Thames Basin Heaths SPA – the SPA is fragmented and is interspersed by urban areas, making it particularly vulnerable to the effects of new development and urbanisation, with the Surrey Heath Thames Basin Heaths SPA Supplementary Planning Document (SPD) highlighting key threats to the protected species as human activity including recreational activity such as dog walking. Predation by domestic cats is also a risk factor, as well as fly tipping and arson.

In 2009, the Thames Basin Heaths Joint Strategic Partnership Board (JSPB) endorsed a strategic Delivery Framework, which recommends a combination of three avoidance measures to protect the Heaths from the impact of new residential development, including the establishment of a 400 metre buffer around the SPA within which no net new residential development will be permitted. The SPA covers approximately 23% of the Borough and the associated 400m buffer zone affects a further 19%.

With regards to land beyond the 400m buffer zone the JSPB Delivery Framework established the principle of Suitable Alternative Natural Greenspace (SANG) provision as a means of avoiding and mitigating impacts, and the Surrey Heath SPD sets out detailed guidance, including that development schemes involving 136 or more net residential units will *generally* be expected to provide bespoke SANG solutions (N.B. larger developments in the western urban area may also be able to use capacity at *strategic* SANGs, and this approach may also apply to sites outside this area that have particular, site specific circumstances which support the need for off-site SANGs provision).

The Councils SANG Strategy (2020) set out the Council’s approach to the provision of SANG, concluding that that “*SANG capacity in the west of the Borough is becoming very limited*”. The issue reflected the inherent constraints to delivering SANG in this area combined with a significant amount of SANG capacity being banked by applications not coming forward (most notably Prior Approvals). However, a significant amount of work was subsequently undertaken to explore options for increasing SANG capacity (also reducing the baseline need for SANG by reducing the time period for which a planning application is valid), as explained within the Thames Basin Heaths Topic Paper (2021). The situation has now improved, but there remain issues, which are discussed further below, in Sections 5.3 and 5.4.

- Thursley, Ash, Pirbright & Chobham Special Area of Conservation (SAC) – the study explains: “*Within Surrey Heath the SAC is coincidental with the SPA and it is recognised that the mechanisms outlined above for the Thames Basin Heaths SPA would also serve to protect the underlying SAC. As such... the SAC can be considered to have no notable additional impact upon the availability of land for residential development or the potential capacity of residential sites over and above the... [SPA].*”
- Sites of Special Scientific Interest (SSSIs) – all coincide with the Thames Basin Heaths SPA, with the exception of Basingstoke Canal SSSI. On this basis, the study explains “*the impact of SSSI’s upon the availability or capacity of land to deliver development... is not significantly greater... than the SPA.*”

- Green Belt – the study sets out the national policy context, in respect of Green Belt purposes and the potential to release land from the Green Belt through a Local Plan only in ‘exceptional circumstances’.

It is also important to note that the study was preceded by a Green Belt and Countryside Study (2017), which examined the degree to which all land within the Green Belt and countryside beyond the Green Belt contributes to the nationally defined Green Belt purposes. The study defined and assessed 71 land parcels within the Green Belt and 36 within the CBGB, concluding:

“... nearly all of the Green Belt and countryside beyond the Green Belt within Surrey Heath fulfils at least two of the purposes of the Green Belt as set out within the National Planning Policy Framework, with many of the functioning Parcels identified as performing either moderately or strongly against at least one Green Belt Purpose. Only 6 Parcels (including sub-divided Parcels) were identified as failing to meet any of the defined Purposes, based on the Methodology set out in Section 5. All of these comprised built-up areas of the washed over Green Belt settlement area of Chobham.”

With regards to “the washed over Green Belt settlement area of Chobham”, this is returned to below.

Furthermore, two subsequent studies have examined the Green Belt:

- In 2018 LUC assessed all potential housing sites – both within the Green Belt and within the countryside beyond the Green Belt (CBGB) – in respect of contribution to Green Belt purposes. Site specific issues and options are discussed further in Section 5.3.
- In 2021/22 SHBC Officers prepared a further study examining detailed parcels (i.e. more detailed than the 2017 study) surrounding settlements (within 400m).¹⁶ There is a clear merit to exploring parcels with robust boundaries (e.g. woodlands), as opposed to submitted sites that typically reflect land ownership boundaries. The study also included a focus on identifying previously developed sites in the Green Belt. Finally, the study goes a step further than the previous studies by providing an overall assessment of Green Belt function and assessing the impact of release of parcels on the integrity of the wider Green Belt.

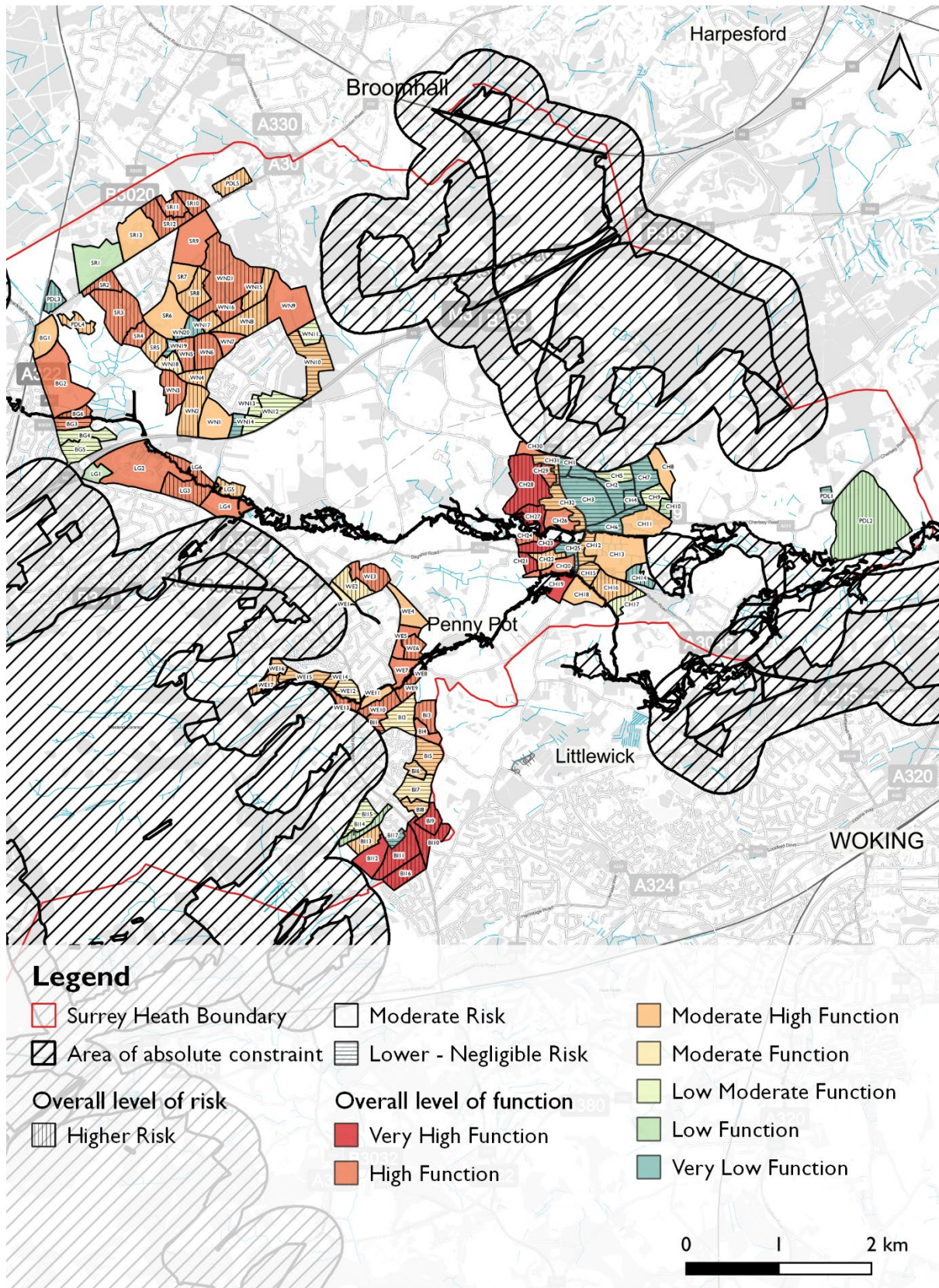
Figure 5.3 shows the key findings of the 2021/2022 study, indicating the level of function of each Parcel against the purposes of the Green Belt as set out in the NPPF, in addition to indicating where release of land would result in the highest and lowest risk to the integrity of the wider Green Belt. The Study recognises that Parcels which demonstrate high functionality and that are also rated as posing a higher risk to the integrity of the wider Green Belt are likely to result in high harm to the Green Belt in the event that they are released. Areas which function poorly and that are also identified as presenting a low or negligible risk to the integrity of the wider Green Belt are likely to result in the least harm to the Green Belt in the event of release.

- Other constraints – the Interim Capacity Study also explained that flood risk zone 3b acts as an absolute constraint to growth within parts of the Borough, and that a further constraint is the Farnborough Airport Public Safety Zone, albeit this is a small area with little bearing on the Local Plan.

5.2.22 Overall, the study concluded that “approximately 45% of land within the Borough is affected by policy or environmental constraints which represent an absolute constraint to residential development, with an additional 29% of land (over and above that affected by absolute constraints) designated as Green Belt...” It is important to note that the study focused on exploring ‘absolute’ constraints’ affecting the Borough and the Green Belt constraint, but did not explore additional constraints that can and should be taken into account when defining and appraising reasonable growth scenarios. These constraints - for example in respect of local biodiversity designations, flood risk zones 3a and 2, surface water flood risk, historic environment designations and infrastructure capacity - are discussed further below.

¹⁶ The decision was taken not to define/assess parcels adjacent to Woking and Sunningdale.

Figure 5.3: Summary findings of the Green Belt Review (2022)



Issues and Options / Preferred Options consultation (2018)

- 5.2.23 At this stage the anticipated plan period was 2016 – 2032, and LHN was understood to be 352 dpa. Having accounted for supply from completions (i.e. sites already built since the start of the plan period), commitments (i.e. sites with planning permission, including 1,200 at Princess Royal Barracks, Deepcut) and windfall (i.e. non-allocated sites that gain permission and are built), the shortfall to LHN was understood to be 2,739 homes. The proposed approach to meeting this homes shortfall was as follows:
- 612 from four proposed allocations in Camberley Town Centre;
 - 260 from five proposed allocations in settlement areas;
 - 250 from two proposed allocations in the CBGB;
 - 886 from other small to medium sized sites identified in the SLAA as deliverable and developable; and
 - 731 unmet need to be provided for elsewhere within the Housing Market Area (i.e. Hart or Rushmoor).
- 5.2.24 Importantly, the proposal at this stage was to maintain the current extent of the Green Belt, including maintaining Chobham's 'washed over' status. It is also important to note that the consultation document did not discuss the need for a supply buffer over-and-above the housing requirement.
- 5.2.25 The **Interim SA Report** then explored this preferred spatial strategy alongside a 'reasonable alternative' approach involving nil release of land from the CBGB and, in turn, lower growth overall. The appraisal found that this approach performed poorly, relative to the preferred option, in terms of housing objectives, but performed well, relative to the preferred option, in terms of biodiversity and countryside objectives. In terms of other objectives the two spatial strategy alternatives were judged to perform broadly on a par.
- 5.2.26 The **consultation** received 1,273 comments from 387 individuals or organisations. Subsequently the Council prepared a Consultation Statement, which summarised headline messages received, including:
- Housing requirement / supply – on one hand, a key message was that there should be more consideration of opportunities to meet the full LHN figure in the Borough. However, on the other hand, there was a widespread concern that the required number of homes might adversely impact the Borough's heathland environment, wider countryside and infrastructure.
 - The plan period – should be amended to span at least 15 years from the point of adoption.
 - Brownfield first – should be a priority.
 - Camberley Town Centre – there was support for development of derelict and redundant sites, and also directing growth here in order to make best use of existing infrastructure.
 - CBGB – one message to come through was that development here should be actively resisted as this would have a disproportionate impact on the western side of the Borough. However, on the other hand, the Consultation Statement records a key message as: *"More efficient use of land in close proximity to settlement boundaries could be utilised for housing development"*.
 - Green Belt – on one hand, a key message was that the Council should undertake a detailed review of Green Belt boundaries, and that greater consideration should be given to the release of Green Belt sites for housing which do not meet the purposes of the Green Belt set out in the NPPF. However, on the other hand, many comments supported maintaining the current extent of Green Belt.
 - Fairoaks Airport is of strategic importance as both an aviation and employment centre and should not be allocated for housing (N.B. it was not allocated for this use). This option is discussed further below.
- 5.2.27 Specific comments of particular relevance to defining reasonable growth scenarios included:
- Rushmoor Borough – *"... there appears to be very limited testing of reasonable alternatives relating to quantum of development as part of the Sustainability Appraisal. It is recognised that what is considered 'reasonable' will be influenced by the characteristics and constraints affecting development in the Borough. However, as a minimum, it would seem reasonable for an option or option(s) where housing need is met within the Borough, to be tested through the Sustainability Appraisal process."*
 - Woking Borough – *"... supportive of the proposed overall spatial strategy for the Borough which appears to rule out a large scale residential and commercial development at Fairoak[s] Airport. However, it would have been helpful for the Council's defence at this early stage of the plan making process to have also tested potential development at Fairoaks as an alternative option before ruling it out."*

Employment Land Technical Paper Update (2020)

5.2.28 This study seeks to update similar studies completed in 2015 and 2016, and aims to “consider the supply of and demand for employment land and premises in Surrey Heath Borough [having] regard to the wider Functional Economic Area (FEA)... to provide evidence to inform and support policies for employment land in the forthcoming Surrey Heath Local Plan.” Importantly, the study introduction also explains:

“the forecasts used to determine future jobs growth and the required amount of employment land to support this are based on projections that were produced prior to the global COVID-19 pandemic.”

5.2.29 A headline conclusion of the study (see final paragraph of the executive summary) is that, without the allocation of new land for employment over the plan period, the supply / demand balance will be *“marginal... particularly in respect of office accommodation.”* Other headline points include:

- There are a range of supply/demand balance figures discussed, depending on the demand forecast that is applied. Under a ‘worst case scenario’, whereby demand is forecast on the basis of past development rates, there is a 12.2 ha supply shortfall over the period 2019-2037 (after having accounted for the existing pipeline, or ‘baseline’, of supply, e.g. consented sites) to be addressed through the Local Plan. However, the study does qualify this shortfall figure, explaining *“The past development rates scenario points to an undersupply... however patterns of use and economic structure are expected to change in the future and some sites will allow for recycling of land as indicated by net completions trends.”*
- With regards to the headline conclusion that there is a broad (‘marginal’) balance between demand and existing (i.e. baseline) supply, the study explains that this is *“subject to suitability of sites.”*
- Surrey Heath is expected to see the strongest growth in Office and Research and Development (R&D) based sectors up until 2037-2040. Meanwhile, despite key local strengths in the area, there is a forecast long-term decline in manufacturing. Accordingly, monitoring of industrial sites should be undertaken and consideration be given where appropriate to them being redeveloped for alternate employment uses including certain office developments, storage and distribution, and small cluster/incubator units for developing micro businesses.
- Whilst labour demand forecasts indicate a small decline for storage and distribution uses, both gross and net completions suggest there is a need for warehousing in the Borough. It is considered that this can be delivered through renewals on existing industrial areas, or sites of manufacturing decline.

Storage and distribution uses are potentially an example of an employment land use for which demand may potentially have risen since 2019, which was the base date for the forecasts applied through the study, in light of the rise of online retail. It is noted that a Freight and Logistics Strategy for the South East is soon to be published (see transportforthesoutheast.org.uk/our-work/freight-and-logistics).

Addressing Climate Change through the Surrey Heath Local Plan (2020)

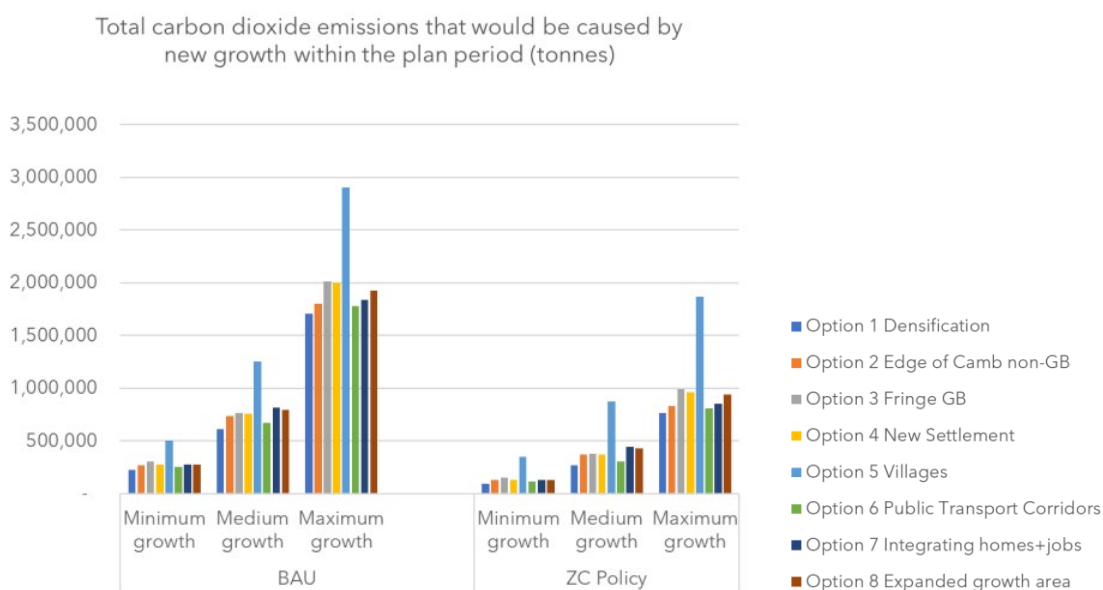
5.2.30 This report considers climate change mitigation and adaptation in turn, in both cases exploring three key questions: 1) What is the context? 2) What is the baseline scenario? 3) What are the intervention options feasibly open to the Council (with a focus on interventions reasonably within the scope of the Local Plan)?

5.2.31 The executive summary presents a [summary](#) of ‘intervention options’, including with a focus on ensuring that climate change is central to decision-making in respect of spatial strategy as much, if not more so, than through development management policy. The first three headline interventions are as follows:

- Proactively explore spatial strategy options for shaping the Borough in a way that contributes to radical reductions in emissions, in accordance with NPPF paragraphs 148 and 149. Amongst other things, this will mean exploring options that direct growth to: those parts of the Borough where residents would have greatest opportunity to access services, facilities and employment by active and public transport; one or more strategic growth locations, where economies of scale and a mix of uses can lead to opportunities; and locations where there is an opportunity for growth to support one or more heat networks.
- There should be a particular focus on exploring decarbonisation options relating to the regeneration of Camberley town centre, which could be a once in a century opportunity. Equally, the process of exploring options should take account of climate change adaptation and resilience objectives, for example in respect of building layout, and design, shading, green infrastructure and drainage.
- Establish site-specific policy for other key strategic locations to effectively respond to climate change; for example, balancing wide ranging competing objectives.

- 5.2.32 The study also explores the question of whether decarbonisation scenarios can and should be formally defined and appraised, and the related question of whether it is appropriate to set a decarbonisation 'target' (e.g. in the form of a trajectory over time) for the Local Plan. The conclusion is that this is not necessarily a helpful or appropriate step to take (see the penultimate page of the executive summary). [Figure 18](#) of the recent UK Heat and Buildings strategy shows that steps taken in respect of new homes represent only a small proportion of total potential emissions savings to 2030.
- 5.2.33 However, methods for scrutinising growth scenarios in terms of decarbonisation objectives are emerging, and the [work](#) recently undertaken in support of the Greater Cambridge Local Plan should be reviewed as an example of good practice. The study notably explores 48 scenarios, where the variables are: 1) growth quantum; 2) spatial strategy; and 3) 'zero carbon policy' – see Figure 5.4. A key point to note is that the performance of scenarios is highly dependent on emissions from transport, leading to the 'Dispersal to villages' scenarios performing very poorly.
- 5.2.34 Emissions from transport are a very significant consideration for Local Plans; however, there is also a need to recognise the role of spatial strategy in respect of minimising built environment emissions. For example, a spatial strategy option might be seen to perform well where it directs growth to: larger schemes with economies of scale; areas with strong development viability (and therefore less concerns over the delivery of climate mitigation along with affordable housing for example); sites with land-owners willing to accept land value capture for public benefit; sites controlled by developers with a proactive approach to decarbonisation; sites associated with inherent opportunities around sharing waste heat (e.g. a WwTW, industrial operation, leisure centre) or capturing ambient heat (e.g. a watercourse); sites with inherent opportunities around renewable power (solar, wind, hydro; albeit recognising that major schemes typically feed into the national grid); and/or schemes where the masterplanning/design concept is supportive of decarbonisation, e.g. with high densities and a use mix supportive of fifth generation heat networks.

[Figure 5.4: Emissions scenarios to inform the Greater Cambridge Plan \(Etude & Bioregional, 2021\)](#)



[Town centre uses and future directions study \(2021\)](#)

- 5.2.35 The context to the study included:
- *“... the dynamic trends influencing and shaping the retail and leisure sectors. Together these policies and trends are generating significant challenges and opportunities for our high streets and town centres, including the Borough’s main centres. These trends have been further compounded and accelerated since March 2020 by the impact of the COVID-19 pandemic.”*
 - Camberley has benefitted from significant new investment over recent years (since the Town Centre AAP, 2014), and is set to further benefit from the regeneration and repurposing of some key strategic sites/buildings in the town centre over the short to medium term. Key sites are:
 - London Road – the majority of this key northern gateway site to the town centre is owned by the Council. It represents the largest regeneration opportunity in the town centre for new residential and mixed-use development, along with the provision of high quality public realm.

- The High Street, Princess Way and Knoll Walk - the Council and the Enterprise M3 Local Enterprise Partnership (LEP) have jointly invested some £4.4m in comprehensive public realm works along the High Street and Princess Way. The works were completed in early 2021.
- The Square - the Council acquired the 42,735 sqm shopping centre in 2016 and has since invested in the refurbishment of the malls.
- Ashwood House / Pembroke House - the Council has led the circa £30m redevelopment of these former office blocks which are identified as key opportunities by the AAP. Berkeley Homes is leading the residential-led redevelopment of both buildings.
- Arena Leisure Centre – located on the edge of the town centre, the Council has entered into a 25-year contract with Places Leisure, to design, build, operate and maintain a £22m facility on the site of the former Arena Leisure Centre. The new centre opened on 1st July 2021.

5.2.36 A headline conclusion of the study is that: *“The forecasts for both convenience and comparison goods show **no** Borough-wide [need] for new retail floorspace over the forecast period, up to 2038; after taking account of new retail commitments and the potential to reoccupy/repurpose vacant space.”*

5.2.37 On this basis, the study recommends:

“... concentrating, consolidating and, in some cases, repurposing the town centre’s existing retail offer. We therefore advise the Council to review its strategy for retail expansion, and instead focus the [Primary Shopping Area] on the blocks comprising The Square and The Atrium, bordered by the High Street to the east, Princess Way to the south, and Obelisk Way to the north...”

... Notwithstanding the contraction of the PSA, we consider that the existing definition and extent of the Town Centre Boundary is still appropriate.”

5.2.38 Other headline findings of the study include:

- *“Notwithstanding the damaging impacts of the pandemic, it has also created potential opportunities for Camberley Town Centre to capitalise on. For example, the increase in home working has generally benefitted commuter towns, local centres and essential shops at the expense of larger cities and towns; and has also reinforced the concept of the walkable and liveable 10-15 minute neighbourhood. Camberley (and Frimley and Bagshot District Centres) should be well placed to build on this trend towards home working, which should in turn increase the demand for more flexible workspace...”*
- *“Fundamental to the transition to more diverse uses that go “beyond retail” will be the provision of a mix of new homes and apartments in centres to help boost their ‘captive’ resident and working catchment populations in the most sustainable way, and to help further support new uses. In Camberley, this will help increase its overall attraction, encourage more frequent trips and spend, and ultimately help to strengthen its overall vitality and viability. The regeneration of the London Road site and the redevelopment/repurposing of buildings across the town centre (e.g. Ashwood House) will go some way to introducing new, high quality and diverse housing into the town centre that is affordable to all ages and income groups. However, it is also important that the right balance is achieved between providing the right mix and right type of new residential uses in the right locations, whilst maintaining the critical retail, leisure, workspace and other uses that are vital to support the growing population and maintain the town’s overall vitality and viability... Article 4 directions could potentially be used to help to protect the integrity, role and function of the “essential core of a PSA”, whilst allowing for new residential and other uses in more secondary streets...”*
- *“Camberley Town Centre is probably better positioned than most centres to grow and flourish over the next decade and beyond. It has many assets, strengths and opportunities upon which to build the next phase of its recovery, regeneration and renaissance; although this will clearly need to look “beyond retail” as the answer to the challenges it is facing and will face. The Council also has a key stake in the town centre through its ownerships and partnerships, and is therefore well placed to proactively develop, manage and curate the town’s offer, and exploit new investment opportunities and funding.”*

Latest context

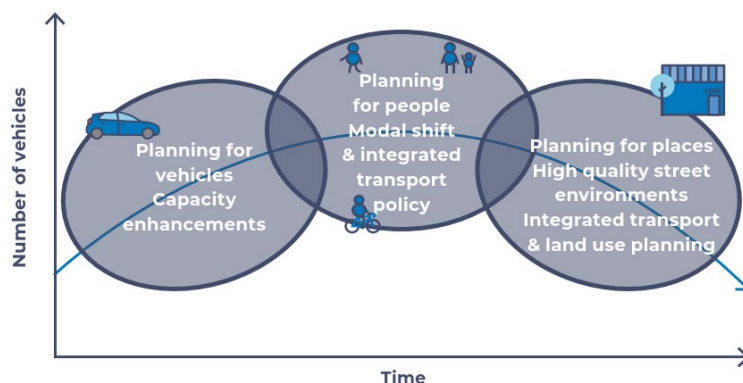
5.2.39 In addition to the broad distribution issues/opportunities and options discussed above, there are wide ranging further considerations of relevance to the task of defining reasonable growth scenarios.

5.2.40 One immediate consideration is the implications of the **C-19 pandemic** and national lockdowns, over-and-above the matters already discussed above. Key further considerations relate to:

- walking, cycling and public transport (a long term uptick in rates of walking and cycling is anticipated, supported by Government investment, but long term public transport patterns are less clear); and
 - indoor and outdoor space. In particular, green infrastructure is more valued than ever as a recreational / well-being resource, and the importance of addressing spatial imbalances in accessibility (both to green infrastructure and quality housing with outdoor space) has come to the fore.
- 5.2.41 A second key point to note, by way of updated national context with major implications for defining growth scenarios, is the increasing focus on Local Plan-making as a central component of the national strategy for addressing the climate and ecological emergency.
- 5.2.42 Beginning with the **Environment Act** (2021), perhaps its centrally important component is a national requirement for development schemes to achieve a 10% biodiversity net gain. This will be measured at the planning application stage, applying the latest Defra 'metric', but there is increasing recognition of an important role for Local Plans, including coordination of offsite compensatory habitat enhancement and creation (also referred to as 'offsetting'). There is a need to target efforts at priority landscapes (e.g. river valleys, historically wooded areas), in-line with established strategic objectives, although there is a need to balance this strategy with a desire to deliver compensatory enhancements in proximity to development.
- 5.2.43 The Environment Act also requires preparation of Local Nature Recovery Strategies (LNRSs) nationwide to guide efforts, and so it will be important for Local Plans to feed-into and integrate with LNRSs as far as possible, ensuring that they are prepared with an understanding of growth locations and means of effectively leveraging development industry funding. The Royal Town Planning Institute (RTPI) recently [commented](#) that there *"needs to be a much clearer requirement and encouragement for LNRS to take the contents of local plans into account when they are being devised and vice versa"*. Ahead of a LNRS covering Surrey Heath, there is a need to draw-upon the long established network of Biodiversity Opportunity Areas (BOAs) defined for the entire South East region (albeit these are high-level / somewhat broad brush) and also emerging work led by the local Wildlife Trust to develop a potential nature recovery map – see <https://www.bbowt.org.uk/nature-recovery-map>.
- 5.2.44 The need to avoid a situation whereby planning for biodiversity net gain leads to a net reduced emphasis on strategic, landscape scale interventions, due to an increased focus on small-scale / piecemeal interventions within development sites, was a point recently highlighted by a research study completed by ze Ermgassen et al. (2021).¹⁷ Whilst the Government had previously anticipated 25% of biodiversity units being achieved offsite, the research found the figure in practice to be much lower, and the study authors express concern about an over reliance on onsite measures as this could lead to opportunities missed in respect of *"strategic investments in the local nature recovery networks"* and *"investments in regional biodiversity priorities that can help restore biodiversity at a landscape scale"*. The authors recognise that there are strong 'access to greenspace' arguments in favour of generating biodiversity units onsite, and that an onsite focus has *"broad support from across stakeholders"*, but suggest *"this priority risks overwhelming the biodiversity goals of the policy... potential trade-offs should be explicitly discussed."*
- 5.2.45 With regards to **decarbonisation**, recent national context comes from the Ten Point Plan for a Green Industrial Revolution, the Energy White Paper, the Transport Decarbonisation Plan, the UK Net Zero Strategy and the Heat and Buildings Strategy.
- 5.2.46 Focusing on emissions from transport, the sub-national transport body – Transport for the South East - recently [responded](#) to the Net Zero Strategy as follows: *"These ambitious commitments support research conducted by TfSE which shows investment is needed across the whole transport network. Looking not only at increasing the availability, affordability and convenience of electric vehicles, but also working towards improving other modes of transport and reducing car-dependency. The additional investment in local transport systems and bus networks cited in the strategy will be essential to support this modal shift."*
- 5.2.47 With regards to the bus network, the National Bus Strategy (2021) explains: *"To avoid the worst effects of a car-led recovery – cities and towns grinding to a halt; pollution, road injuries, respiratory illness and carbon emissions all rising – we need to shift back quickly, by making radical improvements to local public transport as normal life returns. Buses are the quickest, easiest and cheapest way to do that."* The Strategy encourages integration of transport and strategic land use planning, and this is also a key message within the Transport for the South East Transport Strategy (2020) - see Figure 5.5.

¹⁷ zu Ermgassen et al; see <https://conbio.onlinelibrary.wiley.com/doi/full/10.1111/conl.12820>

Figure 5.5: A vision for transport planning over time



5.2.48 With regards to emissions from the built environment, the Ten Point Plan for a Green Industrial Revolution (2020) made clear the extent to which this is a national priority – see Table 5.1 – and there is clarity on: the central importance of considering both operational (or ‘in use’) and non-operational (e.g. embodied) emissions; a focus on an ‘energy hierarchy’ approach to operational emissions; and also the need to focus on heating. For example, the UK Green Building Council (UKGBC) Policy Playbook (2021) explains:

“According to the Climate Change Committee, in order to reach net zero the UK must reduce its emissions from 430 MtCO₂e to around 29 MtCO₂e in 2050. This will require a reduction in the direct emissions from buildings from around 85 MtCO₂e in 2017 to around 4 MtCO₂e in 2050. To achieve this, the Committee has made clear that this will require ‘a new approach that will lead to the full decarbonisation of buildings by 2050’, using a mixture of energy efficiency and low carbon heating measures.” [emphasis added]

Table 5.1: Government’s Ten Point Plan (2020) – ranked by stated emissions savings

Ten point plan	GHG savings 2023-2032 (MtCO ₂ e)
7 Greener Buildings	71
2 Low Carbon Hydrogen	41
8 Carbon Capture, Usage and Storage	40
1 Offshore Wind	21
4 Zero Emission Vehicles	5
5 Public Transport, Cycling and Walking	2
6 Jet Zero and Green Ships	1
9 Natural Environment	-
3 Nuclear Power	-
10 Green Finance and Innovation	-

5.2.49 With regards to operational emissions, there was also important clarity regarding the tightening of Building Regulations to a Future Homes Standard set out in the Net Zero Strategy:

“We will introduce regulations from 2025 through the Future Homes Standard to ensure all new homes in England are ready for net zero by having a high standard of energy efficiency and low carbon heating installed as standard... As an interim measure... we plan to introduce an uplift in standards, effective from June 2022, for England that would result in a 31% reduction in [regulated operational] carbon emissions from new homes compared to current standards.”

5.2.50 The key task for Local Plans, therefore, is to capitalise on this momentum, including by directing new homes to sites with inherent locational built environment decarbonisation opportunities. There is also the possibility of setting local policy to require new buildings to achieve emissions standards that exceed the requirements of Building Regulations and/or specifying how required standards should be achieved (e.g. the extent to which there should be a ‘fabric first’ approach). However, there is a need to avoid stifling innovation and creating a confusing policy environment. See further discussion in Appendix III.

5.2.51 Finally, recent context comes from the RTP/ITCPA *Guide for Local Authorities on Planning for Climate Change* (see www.tcpa.org.uk/planning-for-climate-change) and also a research undertaken by Lichfields (see lichfields.uk/time-to-panic-planning-and-the-climate-emergency) – see Box 5.1.

Box 5.1: Recent context and evidence in respect of built environment decarbonisation

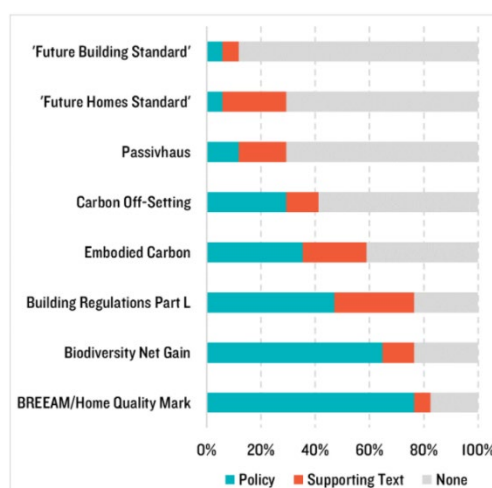
Beginning with the RTPI / TCPA guide, this presents a series of six [basic steps](#) in the section on plan-making. The following is a summary (focusing on mitigation/decarbonisation in particular):

1. Unlock the potential of the local development plan. Ensure that the community is at the heart of the process and that the plan is seen as a key corporate priority in responding to the climate crisis.
2. Understand the legal and policy obligations for action on climate change, including the Sixth Carbon Budget and how these national targets apply to actions that can be controlled or influenced locally.
3. Ensure that there is comprehensive relevant evidence on climate mitigation, and use that evidence to set local carbon reduction targets for the local development plan. Make full use of existing online tools and knowledge partnerships, and seize the digital opportunity to make this evidence accessible to the public.
4. Apply that evidence to assess and then select the policies that are consistent with targets.
5. Use established assessment frameworks to monitor the effectiveness of policy wherever possible, and engage knowledge partners such as higher education institutions to support the analysis of policy impacts.
6. Ensure that whenever a decision is made contrary to plan policy the climate impacts of that decision are fully assessed. Development should not be approved if contrary to targets and objectives.

Beginning with Step 3, it is not clear what form a target for the Local Plan would take' (such that it allows for evaluation and monitoring). Regardless, there is a need to select policies that reflect a level of ambition that reflects the climate emergency (Step 4). Additionally, there is a need to ensure that key decisions taken in respect of spatial strategy and site selection account for decarbonisation as a priority, as discussed. The study also includes a short section on site selection, explaining: *"Reducing the need to travel, connecting to existing heat networks and avoiding areas of flood risk are obvious considerations."*

With regards to 'selecting policies', Lichfields' research article presents very useful analysis of the percentage of recent Draft Plans identifying named 'standards' to address Climate Change in draft policies or in the supporting text of draft policies— see figure. Whilst there is a need for caution around creating a complex and confusing policy environment, there is clear merit to exploring the justification for going beyond the requirements of building regulations and London Plan policy in respect of regulated operational emissions, and also potentially non-operational emissions and unregulated operational emissions. Lichfields conclude:

"... whilst it is not time to panic... planning needs to stand up and be counted in the climate change arena."



Conclusion on broad distribution issues/options

5.2.52 On the basis of the discussion above, the following key messages emerge:

- There are clear arguments for directing housing growth to **Camberley town centre**, both from a perspective of reducing pressure on the Green Belt and countryside beyond the Green Belt (CBGB), but also from a perspective of realising town centre regeneration and decarbonisation opportunities (in respect of both transport and built environment emissions).
- The second sequentially preferable location for growth is clearly the **wider urban area** in the west of the Borough and within the built-up areas of villages, because directing growth here will serve to reduce pressure on the Green Belt and CBGB. No headline strategic opportunities emerge from the discussion above; however, local-level opportunities exist, and are discussed further below in Section 5.4.
- The third sequentially preferable location for growth, in accordance with national policy, is the **CBGB**, with a view to minimising pressure on the Green Belt. There is also a strategic opportunity, in that this part of the Borough is well-connected to the main urban area. However, on the other hand, there is a need to consider the value and sensitivity of the CBGB, both from an environmental perspective (most notably given proximity/links to the TBHSPA) and from a 'communities' perspective, in that the countryside here will tend to be accessible or otherwise valued by residents of the western urban area. A high proportion of the CBGB is subject to 'absolute' constraint, in that it falls within the TBHSPA 400m buffer, and much of the land outside of the buffer is locally designated as a Site of Importance for Nature Conservation (SNCI).

- The least sequentially preferable broad location for growth in the Borough (aside from areas subject to absolute constraints) is the **Green Belt**. Green Belt release would require demonstration of exceptional circumstances, mindful of the degree to which the land in question makes a contribution to the defined Green Belt purposes and the need to promote “*sustainable patterns of development*” (NPPF para 142). When considering ‘sustainable patterns of development’ there can be the potential to take account of growth opportunities (e.g. provision of community infrastructure to meet a need; or supporting a district or local centre); however, the NPPF emphasises that: “*Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport.*” It is for these reasons, and also mindful of the stretching nature of the Borough’s (adjusted) LHN figure and limited potential supply from non-Green Belt locations, that the Council has undertaken detailed Green Belt Review work, which has included a focus on examining brownfield land and also the transport connectivity of Green Belt sites / land parcels. The Green Belt / edge of Green Belt (Bagshot) settlements are subject to a range of non-Green Belt constraints, including in respect of: TBHSPA proximity, most notably land to the west of Bagshot, West End and Bisley, and land to the north of Chobham; flood risk and sensitive river valley environments (landscape, heritage, access, water quality), including Chobham and land between West End and Bisley; the historic environment, including at Chobham and (land to the west of) Windlesham, but also with valued assets, clusters of assets and historic landscapes elsewhere; transport connectivity, for example, Chobham and Windlesham have relatively poor bus connectivity; and road infrastructure, e.g. the A319/A3046 junction within Chobham village centre conservation area is sensitive, and another clear consideration is use of the M3 for local journeys (‘junction hopping’). There are no clear and obvious strategic growth opportunities, but potentially some that might be explored further, e.g. in respect of access to a primary school and strategic planning for green and blue infrastructure.
- Another broad locational consideration relates to the matter of concentrating growth at ‘**strategic**’ sites versus dispersing growth across smaller sites, where strategic sites are those with a housing capacity in the several hundreds or thousands, and associated with economies of scale that enable delivery of a good mix of uses (also a good mix of homes in terms of type, size and tenure), potentially to include employment land, and/or enable delivery of new or upgraded strategic infrastructure. Growth scenarios with a focus on one or more strategic sites can tend to be associated with a range of benefits, for example from a perspective of infrastructure capacity, place-making and decarbonisation. However, strategic sites also give rise to a range of issues, including delivery risk, e.g. because of required infrastructure. Strategic growth options in the Surrey Heath context are relatively limited (e.g. in comparison to nearby Wokingham Borough, see Section 5.3 of the recent Interim SA Report available [here](#)), aside from the opportunity within Camberley Town Centre. However, one new settlement option exists, in the form of Fair Oaks Airport, which has been introduced above and is discussed further below.
- Regardless of whether there is support for one or more strategic sites, there is a need to support a **mix of site types and a degree of dispersal** (mindful of the settlement hierarchy) in order to ensure a robust housing supply trajectory (thereby maintaining a five year housing land supply, as measured against the housing requirement) and meet very local housing needs (albeit these are unquantified).
- There is also a need to consider sites suited to meeting **wider needs**, including for employment land (informed by the Employment Land Technical Paper Update, as discussed above), Gypsy and Traveller and Travelling Show People pitches/plots and sites (informed by the Accommodation Assessment) and specialist housing (informed by the Housing Needs Assessment).

5.2.53 This list does not aim to be comprehensive, with wide-ranging other strategic spatial factors that can and should feed into work to define reasonable growth scenarios, for example in terms of:

- transport connectivity - particularly by public and active transport;
- decarbonisation - a priority issue nationally and locally;
- community infrastructure - albeit there are no headline issues/opportunities, e.g. schools capacity;
- avoiding biodiversity constraints - SANG capacity is a key issue, but there are wide ranging other issues relating to heathland and other habitat areas / networks;
- historic settlement pattern and the wider historic environment - informed by key designations;
- landscape and sense of place - informed by the Landscape Character Assessment); and
- the water environment - informed by the Water Cycle Study, 2017.

5.2.54 However, the above list is considered to provide a useful ‘top-down’ input into the process.

5.3 Site options

- 5.3.1 The primary mechanism for considering site options in isolation is the Strategic Land Availability Assessment (SLAA) led by SHBC Officers, which assessed a total of 113 sites identified through a Call for Sites and targeted correspondence with landowners (informed by a Countryside Capacity Study, which examined land parcels within the CBGB). Another important input was the range of past and ongoing detailed workstreams examining issues and options for Camberley Town Centre, which are feeding in not only to the SLAA and Local Plan, but also a forthcoming corporate Camberley Town Centre Strategy.
- 5.3.2 The SLAA places all (non-permitted) site options into one of three categories in line with the NPPF:¹⁸
- Deliverable (able to deliver in the first five years of the plan period) – a total of 10 site options are identified as deliverable, with a total identified capacity of 295 homes.
 - Developable (able to deliver in the latter years of the plan period) – a total of 44 site options are identified as deliverable, with a total identified capacity of 2,178 homes.
 - Discounted – sites judged not to be deliverable or developable.
- 5.3.3 With regards to the deliverable and developable sites, there is *relatively* limited need to scrutinise the conclusions of the SLAA through the appraisal of reasonable growth scenarios. The stretching nature of the housing requirement options discussed in Section 5.2, combined with an understanding of the extent of environmental and policy constraints affecting the Borough, serves to indicate little reasonable need to test the option of not ‘supporting’ any of these sites through the Local Plan (N.B. the plan will only ‘allocate’ larger sites). Nevertheless, all deliverable and developable SLAA sites are discussed in Section 5.4, before reaching a final conclusion on whether they should be a ‘constant’ (i.e. feature in all scenarios) or a ‘variable’ (i.e. feature under some scenarios but not others) across the reasonable growth scenarios.
- 5.3.4 With regards to discounted sites, 28 of these are discounted on account of being located within the Green Belt, and these sites do warrant close scrutiny, mindful of the stretching nature of the housing requirement options. All discounted Green Belt sites are introduced and briefly discussed in Section 5.4, with a view to identifying those that should be progressed to Section 5.5 and, in turn, explored through the appraisal of reasonable growth scenarios. One of the discounted Green Belt sites has the potential to deliver a new settlement and so warrants particular scrutiny, namely Fair Oaks Airport (Site 890). All other Green Belt sites are relatively small, in that they do not have the potential to deliver a ‘strategic’ scheme (see definition at paragraph 5.2.50, above). When discussing non-strategic Green Belt sites in Section 5.4, there is a clear focus on sites that relate well to an existing settlement, in that they are within circa 50m.
- 5.3.5 With regards to discounted sites outside of the Green Belt, these are discounted for clear cut planning reasons (availability concerns; location within the 400m TBHSPA buffer zone; location within an existing of planned SANG; and complete coverage by an area Tree Preservation Order, TPO), such that they do not require discussion in Section 5.4. However, two sites warrant being highlighted here:
- Site 904 (Land at Kings International College, Watchetts Drive, Camberley) - is discounted for more complex reasons. The proposal requires the redevelopment of some school buildings, which relies on reaching a quantum of residential development (approximately 280 units based on the Call for Sites submission), which generates viability concerns given suitability issues. Specifically, there are a number of suitability issues relating to design and constraints (e.g. flood risk and loss of playing pitches).
 - Site 830 (Land at Pine Ridge Golf Course, Deepcut, or ‘Pine Ridge’) – is currently unavailable, but is notable for having the potential to deliver a strategic urban extension – discussed further in Box 5.2.
- 5.3.6 Finally, as a means of providing supplementary evidence on site options, **Appendix V** presents the findings of an AECOM-led quantitative GIS-based exercise, involving examining the spatial relationship between all site options and a range of constraint/push (e.g. biodiversity designations) and opportunity/pull (e.g. schools) features for which data is available in digitally mapped form for the Borough as a whole. The limited nature of the analysis is such that it does not enable overall conclusions to be reached on the merits of each site (unlike the SLAA); however, it is nonetheless a useful input to Section 5.4.

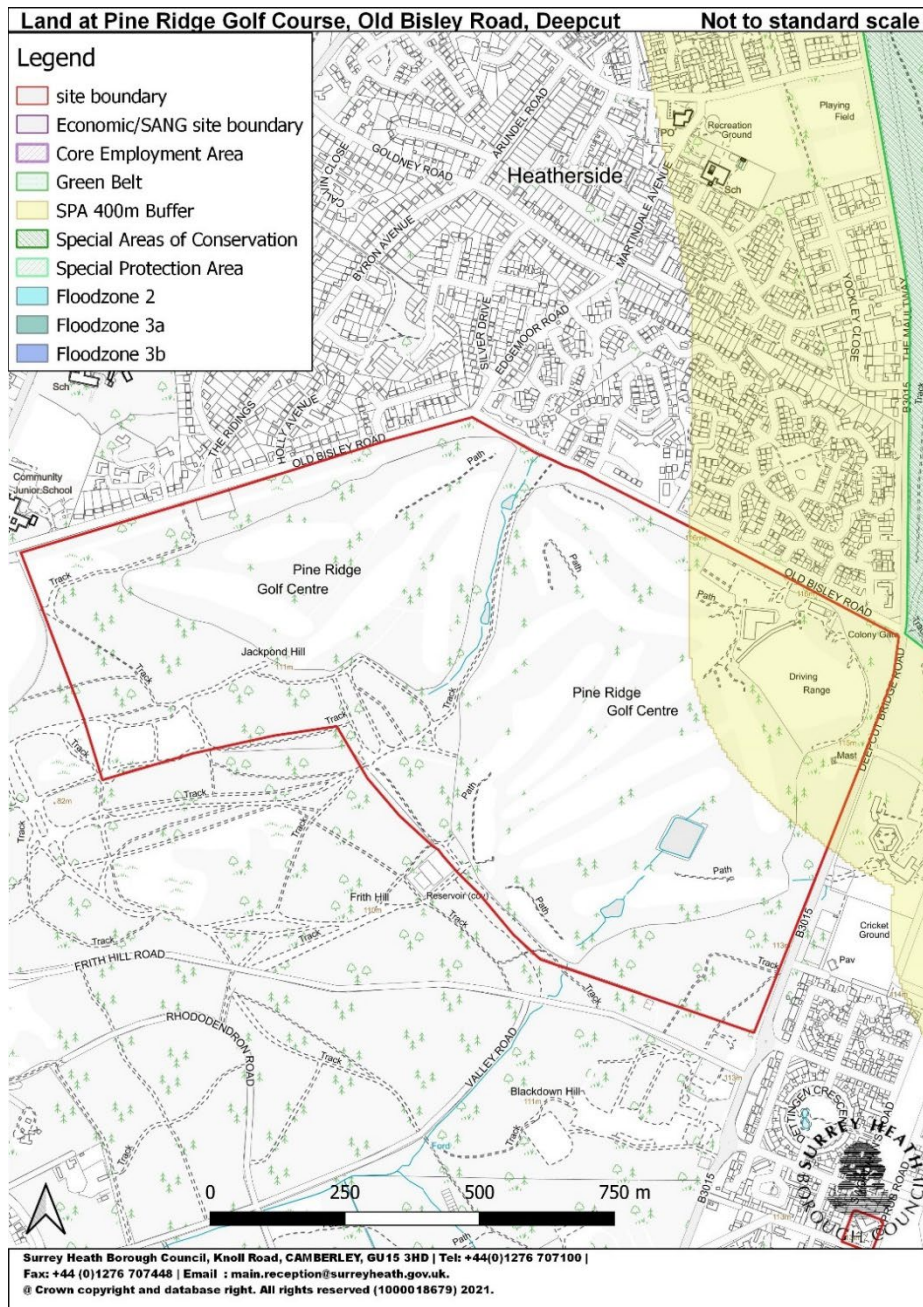
¹⁸ Paragraph 68 states: “Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of: a) specific, deliverable sites for years one to five of the plan period; and specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.”

Box 5.2: Discussion of Pine Ridge

The Pine Ridge site (ID: 830) (also known as the Frimley Fuel Allotments) is located in the Countryside beyond the Green Belt, south of Old Bisley Road, comprising the Pine Ridge Golf Course and surrounding woodland. The site forms part of an extensive area of pine woodland, which strongly contributes to the local distinctiveness of the area and which provides the setting of Deepcut. The site is wholly within a Woodland Tree Protection Order and the eastern extent of the site is within the SPA 400m buffer zone.

A large site covering the entirety of the golf course and the majority of the wider Frimley Fuel Allotments was submitted, by a developer, as part of the Call for Sites 2020/21 and included proposals for up to 900 homes and a Bespoke SANG, supported by a Vision Document. The site was assessed as discounted in the SLAA 2021 as a result of the freehold owner (Trustees of Frimley Fuel Allotments) confirming that the site was not available for development at this time. As such, no capacity assessment was made as part of the SLAA 2021.

Whilst the site is currently unavailable for development, it could have potential to deliver a strategic urban extension to Frimley and provide large areas of SANG, subject to more detailed considerations surrounding site constraints and the local context. If, at a future date, the site were to be confirmed as available for development, its location within the Countryside beyond the Green Belt, and adjacent to the main urban area, serves to indicate that the option of growth here would be sequentially preferable to the option of Green Belt release.



5.4 Sub-area scenarios

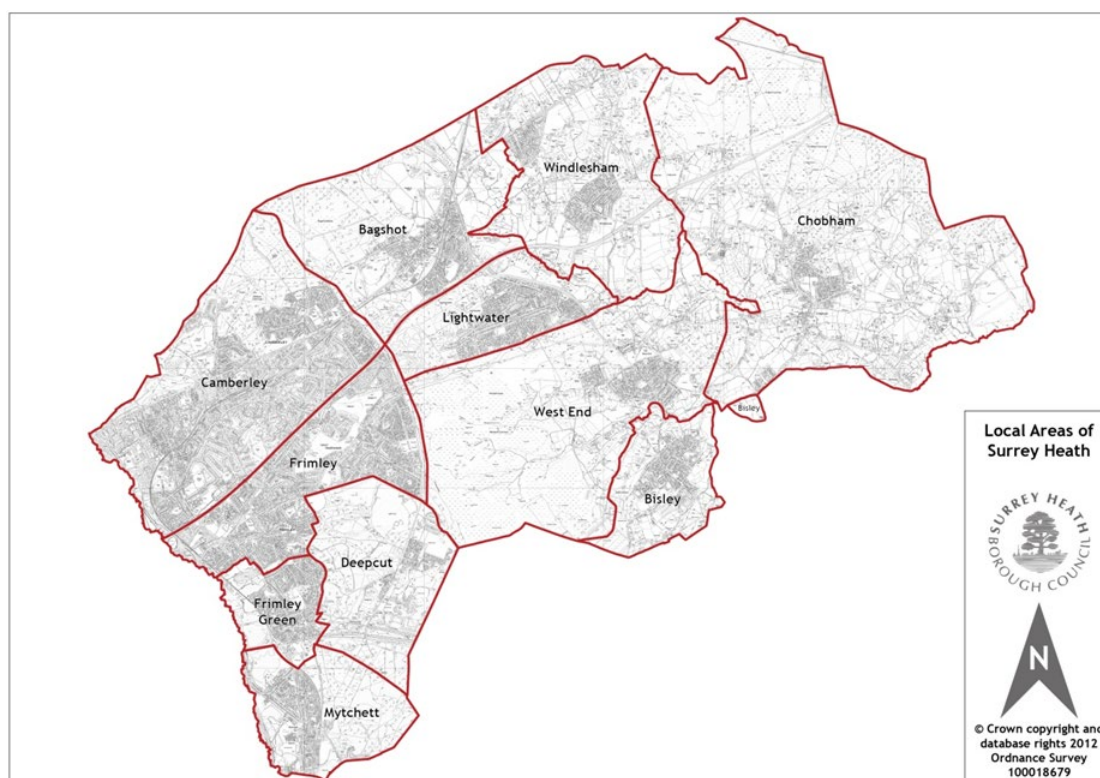
Introduction

- 5.4.1 Discussion has so far focused on A) 'top down' considerations of housing quantum and broad distribution issues and options; and B) 'bottom-up' consideration of site options. The next step is to consider each of the Borough's sub-areas in turn, exploring how sites might be allocated/supported in combination.

What sub-areas?

- 5.4.2 There are eleven quite well-established sub-areas within the Borough – see Figure 5.6. Evidenced views on potential adjustments to these sub-areas would be welcomed through the current consultation.

Figure 5.6: Borough sub-areas



Structure of this section

- 5.4.3 The sub-areas are discussed in alphabetical order, with each discussion structured under four headings:
- Completions and commitments – i.e. homes delivered since the start of the plan period, or set to come forward at sites with planning permission.
 - SLAA sites – the aim is to briefly discuss sites identified by the SLAA as deliverable or developable;
 - Discounted sites – the aim is to identify sites discounted by the SLAA that warrant being taken forward to Section 5.5 and, in turn, detailed consideration through appraisal of reasonable growth scenarios;
 - Conclusions – the aim is to conclude on sub-area scenarios to progress to Section 5.5.

A note on methodology

- 5.4.4 The aim here is not to present an appraisal of reasonable alternatives, but rather to discuss site and sub-area options in order to inform the definition of reasonable alternatives (borough-wide growth scenarios). The discussions are systematic (see above), but discretion and planning judgment is applied.
- 5.4.5 This approach is taken mindful of the fundamental legal requirement, which is to explain reasons for arriving at reasonable alternatives (which we define as growth scenarios; see Section 4) in "outline" terms only. Views on the approach taken are welcomed through the current consultation, including evidenced views on sub-area scenarios that might be the focus of detailed appraisal.

Bagshot

Completions and commitments

- 5.4.6 There have been 48 completions since the start of the plan period, and 236 homes have permission. One of these sites (134 and 136 London Road) only has *outline* permission, such that it warrants allocation.

SLAA sites

- 5.4.7 The SLAA identifies eight sites with a total capacity of 134 homes, of which one is large enough to warrant allocation, namely **Site 247** (Bagshot Depot and Archaeology Centre, London Road; 50 homes).

- 5.4.8 This site is in public sector ownership, comprises PDL within the settlement boundary and benefits from excellent proximity to a rail station. There are suitability issues relating to the historic environment (adjacent Bagshot Park, also an onsite locally listed building) and the two adjacent a-roads (the A30 and the dual carriageway A322), plus further work is required to confirm access arrangements, and there is a need to relocate the existing operational depot onsite (such that delivery is assumed in years 6-10 of the plan period). However, on balance, this site can reasonably be progressed to Section 5.5 as a site that should feature as an allocation for 50 homes across all the reasonable growth scenarios (i.e. a 'constant').

- 5.4.9 The remaining seven sites comprise three clusters. Firstly, **Sites 317, 320 and 714** are located at or close to the northern edge of the historic core, in proximity to both the district centre and the rail station:

- All three are currently in employment use, however: Site 714 has prior approval for conversion to residential under permitted development rights;¹⁹ Site 317 has been identified as not warranting a formal employment designation;²⁰ and at Site 320 the proposal is to retain employment uses.
- Site 320 is located to the west of the A30 and adjacent to Bagshot Park.
- Sites 317 and 320 are located in a flood risk zone.

- 5.4.10 Secondly, **Site 448** is located at the southern extent of the village, outside of the current settlement boundary, but with the potential to fall within a redrawn boundary. The site comprises an existing house with a degree of historic character (shown on the pre-1914 OS map; adjacent to a locally listed public house) in a large plot comprising mature trees/vegetation (though no TPOs) adjacent to woodland (priority habitat, TPOs and council owned, but not a SNCI and not accessible as open greenspace).

- 5.4.11 Thirdly, **Sites 407, 408 and 901** are located to the south of Bagshot, where there is a collection of built form alongside the A30, between Bagshot and Camberley, including a listed building and two adjacent homes with a degree of historic character (shown on the pre-1914 OS map, but not locally listed). Aside from historic environment constraint, considerations include:

- Accessibility – given a distance of over 1km to the district centre, although there is a cycle path along the A30, and also potentially good bus connectivity.
- Woodland - Site 408 comprises woodland shown on the pre-1914 OS map, and around half is shown as priority habitat by the nationally available dataset (magic.gov.uk).
- Rural character – there is a concern regarding intensification of built form in a sensitive part of the countryside between settlements, also mindful of nearby Site 448. However, it is noted that a low density is proposed for all three sites (albeit a primary aim is to buffer the railway line). Also, the extent of woodland and SANG in this broad area serves to suggest limited risk of 'sprawl' in the long term.

Discounted sites

- 5.4.12 Two are within the CBGB, to the south of the village, and two are located in the Green Belt, to the east.

- 5.4.13 Beginning with the two sites in the CBGB, **Site 446** is an existing SANG; and **Site 798** is Council owned priority habitat woodland (associated with historic Pennyhill Park) with a blanket TPO covering the entire site, plus the site partly intersects the TBHSPA buffer. Both sites were put forward for SANG use.

¹⁹ The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2013 introduced new 'permitted development rights' which allow for the change of use from an office building to residential without requiring planning permission. Approval is subject to a prior notification process, covering significant transport and highway impacts, development in safety hazard zones, areas of high flood risk and land contamination. The rights were made permanent in April 2016.

²⁰ The Employment Land Review (2016) did not recommend allocation as a Strategic or Locally Important Employment Site.

- 5.4.14 Of the two sites in the Green Belt, **Site 812** can be immediately ruled out on account of being unavailable (also distant from the settlement boundary and within a flood risk zone). With regards to **Site 736**, which is located to the north of the village, the site is not adjacent to the settlement boundary and, indeed, is separated from the village by the A332; however, it is marginally within 50m of the settlement boundary, which is a threshold distance at which a site is judged to relate suitably well to the settlement, such that it warrants further consideration (as discussed in Section 5.3). There are a range of issues and constraints, but no absolute constraints that serve to rule the site out of contention at this stage in the process.

Conclusion

- 5.4.15 On the basis of the above discussion (also mindful of discussion within Sections 5.2 and 5.3), there are **two reasonable growth scenarios** for Bagshot (over-and-above completions/commitments):
- 1) 134 homes across the eight SLAA sites; and
 - 2) Scenario 1 plus an allocation necessitating Green Belt release (see Section 5.5).
- 5.4.16 With regards to lower growth – i.e. a scenario involving removing or revising down the capacity of one or more SLAA sites – this warrants consideration, given issues with certain sites (see further appraisal in Section 9), but there is no reasonable need to formally progress a lower growth scenario to Section 5.5, mindful of the stretching nature of the potential housing requirement figures discussed in Section 5.2, and given that Bagshot is a well-connected village that benefits from a district centre. 418 homes does not necessarily amount to a ‘high growth’ strategy for a village such as Bagshot.

Bisley

Completions and commitments

- 5.4.17 There are no existing completions or commitments at Bisley.

SLAA sites

- 5.4.18 The SLAA identifies three sites for a total of 32 homes, namely **Sites 236, 573 and 763**. All are small sites (6, 17 and 9 homes respectively) and within the settlement boundary, but considerations include:
- Accessibility – Sites 236 and 573 are located near to the southern extent of the settlement, around 800m from the neighbourhood parade located near to the northern extent of the village.
 - Townscape and character – Site 236 comprises land to the rear of three or four homes potentially with a degree of historic character, although none are locally listed and they are not shown on the pre-1914 OS map. The proposal is to support a high density scheme of approximately 80 dph.
 - Employment – Site 573 is currently a light industrial site, although the site has previously been granted planning permission for residential redevelopment.

Discounted sites

- 5.4.19 The five discounted sites are all located within the Green Belt, with one site unavailable such that it can be ruled out at this stage in the process, namely **Site 741**. With regards to the remaining four sites, namely **Sites 740, 800, 902 and 903**, all warrant being taken forward for further consideration within Section 5.5. This is because: all are either adjacent (three of the four sites) or within 50m (one of the five sites) of the settlement boundary; and, whilst there are a range of issues, none of the sites are associated with absolute constraints that enable the option of allocation to be ruled out at this stage in the process.

Conclusion

- 5.4.20 There are **two reasonable growth scenarios** for Bisley:
- 1) 32 homes across the three SLAA sites; and
 - 2) Scenario 1 plus one or more allocations necessitating Green Belt release (see Section 5.5).
- 5.4.21 There is limited argument for exploring lower growth (i.e. a scenario involving removing or revising down the capacity of one or more SLAA sites), including because total housing growth of 32 homes in the plan period amounts to a low growth strategy (albeit Bisley is closely associated with West End and Woking).

Camberley town centre

Completions and commitments

- 5.4.22 Data on completions and commitments is available only for Camberley as a whole. Specifically, there have been 218 completions since the start of the plan period, and 498 homes have full permission.

SLAA sites

- 5.4.23 The SLAA identifies five sites with a total capacity of 1,273 homes, namely **Sites 25, 27, 721, 814 and 921**. In each case the primary question for consideration here relates to development density, as opposed to the question of whether the site is suitable for redevelopment. Taking each of these sites in turn:

- Site 25 (Camberley Station) - the Camberley Town Centre AAP allocation indicates 50+ units at the site. However, a 75 home mixed use scheme is now considered appropriate, with the SLAA explaining:

“Overall, taking account of the sustainable town centre location at Camberley train station and nearby buildings that are in excess of 4 storeys, the site is considered to have a capacity for a minimum of 75 units. Camberley Station is located in the town centre of Camberley, just around the corner from the High Street. Due to the strategic importance of the site, being used by rail passengers, its central location and the potential for redevelopment of the larger area, including major regeneration sites on the other side of Pembroke Broadway, the station site is considered to be a key regeneration site in the Borough...”

- Site 27 (Land east of Knoll Road) – is a key strategic site, located within the Eastern fringe of Camberley Town Centre. There are a wide range of issues and opportunities, which are a focus of discussion in Section 9 of this report, and it is expected that the allocation will generate interest and comment through the current consultation. AECOM and SHBC Officers discussed the possibility of defining and appraising growth scenarios specific to this site (e.g. in the form of alternative development quanta), but ultimately determined that reasonable scenarios could not be identified.
- Site 721 (Central House, 75-79 Park Street) – is a small site at the southern extent of the primary shopping area (as currently defined). The SLAA supports 6 homes, as per an expired planning permission.
- Site 814 (London Road Block) – is a second key strategic site, located south of the A30 London Road on the edge of the Town Centre. As per Site 25, issues and opportunities are explored in detail in Section 9, and evidenced views on reasonable alternative scenarios would be welcomed through this current consultation.
- Site 921 (Land east of Park Street, north of Princess Way) – is located centrally within the primary shopping, and is currently occupied by House of Fraser. The SLAA explains that *“surrounding densities [are] in excess of 200 dph. With an additional storey, 120 units is considered achievable at the site.”*

- 5.4.24 A further site for consideration is **Site 865** (84-100 Park Street), which is located at the south west fringe of the town centre. This site has permission for 61 sheltered apartments, and so does not appear within the SLAA, but is now considered suitable for a revised, residential (C3) development scheme (61 homes).

Discounted sites

- 5.4.25 There are three discounted sites, namely **Sites 250, 1002 and 1003**; however, two are discounted due to availability concerns, whilst the third is below the SLAA size threshold.

Conclusion

- 5.4.26 There are clearly a range of important strategic considerations (issues and opportunities) that must factor into planning for Camberley town centre. As such, there is an argument for defining and appraising growth scenarios. However, at this current stage no reasonable growth scenarios are readily apparent, such that it is reasonable to progress just **one growth scenario** to Section 5.5, namely a scenario involving support for the five SLAA sites, plus Site 865, for a total of 1,226 homes. Evidenced views on reasonable growth scenarios would be welcomed through the current consultation.

Camberley wider urban area

Completions and commitments

5.4.27 Data on completions and commitments is available only for Camberley as a whole. Specifically, there have been 218 completions since the start of the plan period, and 498 homes have full permission.

SLAA sites

5.4.28 The SLAA identifies 12 sites with a total capacity of 265 homes, namely **Sites 21, 49, 240, 295, 314, 424, 717, 801, 832, 833, 877 and 878**. N.B. Sites 21 and 801 are proposed for C2 older persons accommodation, and so equivalent C3 capacity is assessed at 1 dwelling for every 1.94 bedrooms, in accordance with PPG and local evidence on household occupancy rates within Surrey Heath.

5.4.29 All of these are small sites, but give rise to considerations including:

- Employment – most notably, Sites 296 and 878 are both strongly associated with an existing employment area. Also, Site 314 comprises a builders merchants and Sites 717 and 721 comprise hotels.
- Community uses – Site 240 currently comprises the Camberley Centre, which is an adult education centre. The existing use of an adult education centre would either need to be retained and incorporated as part of any future development, or relocated in an equally accessible location.
- Historic environment – Site 240 includes a locally listed building, with the SLAA explaining “... *the site benefits from the Camberley County First School building, a local heritage asset, which strongly contributes to the ambience and attraction of the place. The building and its setting should be retained and form the focal core of the site in a heritage-led regeneration scheme, making sustainable use of the historic building.*” The SLAA goes on to explain: “*If the locally listed building [was] to form part of the proposed development, a higher capacity could be achieved at the site.*”
- Noise – two sites (Sites 314 and 878) are adjacent to the railway line.
- Flood risk – one site (Site 878) is located in flood risk zone 2.
- TPOs – one site (717) is covered by an area TPO. Also, Site 801 is described as being located in an area with “*vigorous hedge boundaries which contribute to the verdant street scene character.*”
- Greenspace – Site 424 comprises non-designated amenity greenspace associated with a block of flats, including mature trees.
- Car parking – Site 833 comprises a car park and adjacent Site 49 comprises garages.
- Townscape / character – Site 877 is an existing single dwelling on a large plot proposed for eight homes.
- Combined scheme – Sites 49, 424 and 833 are adjacent, with a combined identified capacity of 49 homes.

Discounted sites

5.4.30 There are seven discounted sites in total, of which four are small sites ruled out due to availability concerns, namely **Sites 6, 246, 500 and 804**. The remaining three sites are:

- **Site 37** – comprises an area TPO, also partly priority woodland habitat.
- **Site 802** – comprises an area TPO.
- **Site 904** – is discounted due to suitability and viability concerns. The site comprises Kings International College, and has been discussed above, in Section 5.3.

Conclusion

5.4.31 Whilst there are choices to be made, including in respect of development densities and use mixes at certain of the SLAA sites, on balance it is reasonable to progress just **one growth scenario** to Section 5.5, namely a scenario that sees support for the 12 SLAA sites for a total of 266 homes.

Chobham

5.4.32 As an initial point, it is important to note that whilst Chobham is currently washed over by the Green Belt, the current proposal is to inset the village from the Green Belt – see discussion in Appendix IV.

Completions and commitments

5.4.33 There have been 52 completions since the start of the plan period, and 14 homes have permission.

SLAA sites

5.4.34 The SLAA identifies three sites with a total capacity of 114 homes, of which one is large enough to warrant an allocation in the Local Plan, namely **Site 447** (Chobham Rugby Club, Windsor Road), which has a capacity of 91 homes. The site includes some PDL, and SLAA explains “*development is dependent on the relocation of the existing recreational use. It has been advised that a new location has been sought, but until this can be fully established, the site is phased in the medium term... The capacity indicated in the submission is relatively low in density and therefore it is considered that there is scope for the retention of green space and possible incorporation of additional green infrastructure on site.*”

5.4.35 The other two sites identified as having capacity by the SLAA are also of note.

- **Site 548** – is located outside of the proposed Green Belt inset boundary. However, the site is partially PDL, such that some development could take place without Green Belt release. Further considerations relate to flood risk and historic environment / landscape, recognising that the Chobham conservation area is adjacent, and the main building on the site is shown on the pre-1914 OS map.
- **Site 1001** – is a PDL site comprising the Chobham Club. The SLAA explains: “*... redevelopment of this site would need to incorporate the adequate re-provision of the existing use on-site, or demonstrate that there is no need to do so through the planning application process. The previous planning application sought to re-provide the community facility use on-site.*” It is located adjacent to Site 447.

Discounted sites

5.4.36 There are a total of 15 discounted sites, all of which are currently located in the Green Belt and will remain so if and when Chobham is inset. However, nine of these sites can be ruled out at this stage for clear cut reasons, namely **Sites 409, 414, 510, 543, 835, 843, 751, 917 and 919**. Specifically: six of these are beyond 50m of the draft inset boundary (plus Sites 543 and 917 are within the TBHSPA 400m buffer zone); Sites 409 and 510 are entirely or mostly within flood risk zone 3; and Site 751 (which comprises land adjacent to Longcross Garden Village; see the [Runnymede Local Plan](#)) is within the SPA buffer.

5.4.37 With regards to the remaining six sites:

- **Site 923** (Fairoaks Airport) – has already been introduced above, as a site that is being proposed for a Garden Village, and the only strategic growth option open to the Local Plan, outside of Camberley town centre. At this stage it is important to note that a planning application for a 1,000 homes scheme was submitted in 2018 (ref. [18/0642](#)), before the planning application was withdrawn in February 2020.
- **Sites 238, 546, 597, 916 and 918** - there are a range of issues and constraints, but no absolute constraints that serve to rule the site out of contention.

5.4.38 Finally, there is a need to consider **Site 548** in detail. As explained within the SLAA, there are three parts to the site, and the SLAA identifies one of these as having capacity, due to the potential for development without Green Belt release. However, for the purposes of exploring reasonable higher growth scenarios it is reasonable to explore the possibility of more extensive development within the site boundary.

Conclusion

5.4.39 There are **three reasonable growth scenarios** for Chobham (above completions/commitments):

- 1) 114 homes across the three SLAA sites; and
- 2) Scenario 1 plus one or more allocations necessitating Green Belt release (outside of the currently proposed GB inset area; see Section 5.5).
- 3) Scenario 1 plus Fairoaks Garden Village (see Section 5.5).

5.4.40 With regards to the possibility of a lower growth scenario – see discussion in Appendix IV.

Deepcut

Completions and commitments

5.4.41 There have been 118 completions since the start of the plan period, and 1,113 homes have permission.

SLAA sites

5.4.42 The SLAA identifies eight sites with a total capacity of 138 homes.

5.4.43 One of the sites identified as having capacity by the SLAA is large enough to warrant an allocation in the Local Plan, namely **Site 552** (Land at Frimhurst Farm, Deepcut Bridge Road), which has an identified capacity of 65 homes. A low development density is proposed, to take account of the adjacent railway and Basingstoke Canal (SSSI and conservation area) and tree coverage. There are also access challenges, with the SLAA explaining: *“Existing access... is at a point where the road reduces to a single lane over a railway bridge, on a slight bend. Consultation with... SCC would need to take place regarding the safety of access, if it were to be upgraded, which may impact the delivery of the site.”*

5.4.44 The following bullet points consider the remaining seven sites in turn:

- **Site 504** – the SLAA explains that the capacity has been reduced from 11-17 homes to five homes, to account for *“wooded character and low surrounding densities.”*
- **Site 757** – the SLAA explains that the capacity has been reduced from 52 homes to 21 homes, to account for the *“irregular shape, areas of detachment, countryside location [and] group TPO on site.”* It is also noted that the railway is adjacent, and that part of the site falls within the TBHSPA 400m buffer. Furthermore, removal of trees and vegetation may be necessary to achieve safe access. The SLAA also explains: *“Much of the site consists of relatively dense, mature woodland.”*
- **Site 846** – is a small previously developed site that gives rise to few issues.

- **Site 887** – the SLAA explains: *“The site currently comprises two dwellings surrounded by significant woodland. The site is 4.32 ha in total. However, an area covering 2ha of the site is indicated as the part of the site that is suitable for development... The woodland strongly contributes to the character and local distinctiveness of the area... The deep woodland belt is characterised by only a few individual residential properties with large plot sizes, all surrounded by woodland.”*

There are also issues with access, with the SLAA explaining *“the existing access is via a narrow track/driveway, which does not allow two vehicles to pass... Therefore, substantial improvement would be required to make this access safe and suitable to serve the proposed development.”*

The SLAA then concludes: *“The current proposal is for 60 – 90 units. However, the SLAA capacity for the site is derived from the existing footprint from the development on-site, to ensure that the proposals would be sensitive to the character of the area.”*

- **Site 920** – is a wooded site and also notably adjacent to a woodland SNCI. The SLAA concludes: *“Development of the site at 30dph would provide 95 dwellings. Due to the site’s heavily wooded character and location within an area of countryside that provides a gap between settlements, it is considered that capacity would need to be reduced, to retain woodland areas, and reflect the rural character of the locality. Accordingly, titles comprising wholly undeveloped woodland without residences or other buildings are deducted from the total site area, when taking account of capacity calculations... A capacity of 17 dwellings is derived, applying a lower threshold of 10dph to the remaining 1.7ha area, having regard to the rural, densely wooded character of the site.”*
- **Sites 922 and 926** are adjacent sites adjacent to Frimley Green, within the CBGB. The submitted capacity of the two sites is up to 20 homes, but the SLAA supports 10 mindful of *“countryside designation, the limited existing built form and small size and surrounding low densities.”*

Discounted sites

5.4.45 There are five discounted sites in total, of which two are ruled out due to availability concerns (**Sites 378 and 830**) and two are below the SLAA site size threshold (**Sites 906 and 923**). The final site (**Site 836**) is also ruled out for quite clear cut reasons, with the SLAA explaining: *“The site comprises part of the SANG that is in place to mitigate the impacts of the Princess Royal Barracks development.”*

N.B. see stand-alone discussion of Site 830 in Box 5.1, above.

Conclusion

- 5.4.46 On the basis of the discussion above it is evident that, in addition to a scenario involving support for the eight SLAA sites, there is potentially merit to exploring a lower growth scenario involving removing or revising down the capacity of one or more SLAA sites. This is on the basis of the extent of woodland constraining this area, as well as an understanding that this area is set to see high growth over the plan period due to the committed Princess Royal Barracks scheme building-out. However, there is no way to easily define a lower growth scenario (including noting that site capacities have already been revised down from call for sites submissions) and the total number of homes involved is small. As such, and on balance, it is reasonable to progress just **one growth scenario** to Section 5.5, namely a scenario involving support for the eight sites identified by the SLAA for a total of 138 homes.

Frimley

Completions and commitments

- 5.4.47 There have been 51 completions since the start of the plan period, and 107 homes have permission.

SLAA sites

- 5.4.48 The SLAA identifies three sites with a total capacity of 260 homes, including one site proposed for C2 older persons accommodation.

- 5.4.49 One of the SLAA sites is large enough to warrant an allocation in the Local Plan, namely **Site 907** (Sir William Siemens Square, Chobham Road). The SLAA concludes: *“The Council’s urban design officer has undertaken an assessment of the site and has determined the capacity of approximately 200 dwellings as appropriate for the site. This takes account of the existing context of the site and that the whole site may not be developed due to its current status as an employment site.”* The SLAA also explains: *“The site is sustainably located, within 1km of Frimley train station and approximately 2km south of Camberley Town Centre. There is good access to local services, schools and recreation space.”*

- 5.4.50 Of the remaining two sites, **Site 882** is a small previously developed site that gives rise to few issues. However, **Site 837** is more notable, as this comprises former playing fields. The SLAA explains:

“A workable solution for the green space designation and the TPO trees that bound the site will be required. The capacity for the site has been reduced due to the need to find a workable solution and give consideration for the protected trees that border the site, and this could impact on the viability of the proposed extra care use. A long-term solution for the retention of existing trees and the possibilities to retain and incorporate some of the greenspace within a future scheme would be required. The capacity has also been decreased due to the potential urbanising influence of a large building in this location... The site has been resubmitted for 64 extra care apartments... However, the density has been decreased due the green space and TPO designations, with the site assessed as having capacity for 20 C2 units.”

Discounted sites

- 5.4.51 There is only one discounted site, namely **Site 566**, which is discounted due to availability concerns.

Conclusion

- 5.4.52 Whilst there are choices to be made, perhaps most notably in respect of Site 882, on balance it is reasonable to progress just **one growth scenario** to Section 5.5, namely a scenario that sees support for the three sites identified as having capacity by the SLAA for a total of 215 homes.

Frimley Green

Completions and commitments

- 5.4.53 There have been no completions since the start of the plan period, but 23 homes have permission.

SLAA sites

- 5.4.54 The SLAA identifies capacity at two sites for a total of 177 homes.

- 5.4.55 Firstly, **Site 329** is an existing employment site located next to Frimley Green local centre, proposed for a relatively high density scheme comprising 17 homes.

5.4.56 Secondly, **Site 557** is a larger site located between the defined settlement areas of Frimley Green and Mytchett. It is located on land designated countryside beyond the Green Belt, and its location between settlements leads to a degree of sensitivity, but it is predominantly previously developed, and is well contained by two railway lines (leading to a degree of noise pollution concern) and the railway and the B3411. A further consideration is the near adjacent church, although the church is only grade 2 listed. Importantly, the site now has planning permission (subsequent to the SLAA base date) and is able to deliver in the first five years of the plan period.

Discounted sites

5.4.57 The three discounted sites - **Sites 195, 299 and 512** - are all discounted due to availability concerns.

Conclusion

5.4.58 There appears to be relatively little in the way of strategic choice at Frimley Green, recognising that Site 557 now has planning permission. As such, it is reasonable to progress just **one growth scenario** to Section 5.5, namely a scenario that sees support for the two SLAA sites for a total of 177 homes.

Lightwater

Completions and commitments

5.4.59 There has been one completion since the start of the plan period, and two homes have permission.

SLAA sites

5.4.60 The SLAA identifies one site for 17 homes, namely **Site 908**. The SLAA explains: *“The site was submitted for between 31 - 50 units. The site is PDL in the settlement area with no major constraints. Surrounding densities approximately 30-35dph, but as the site contains substantial built form and is close to Lightwater Local Centre, partial flatted development could be considered. The site is therefore identified for 17 units.”*

Discounted sites

5.4.61 The three discounted sites - **Sites 909, 910 and 911** – are all within the TBHSPA buffer.

Conclusion

5.4.62 There appears to be little in the way of strategic choice at Lightwater. The village is set to see low growth over the plan period, but this reflects the extent of environmental constraint, with the TBHSPA abutting two sides of the village, and the third side defined by the A322 with the Windle Brook corridor beyond (associated with extensive woodland and a cluster of listed buildings). As such, it is reasonable to progress just **one growth scenario** to Section 5.5, involving support for the one SLAA site for 17 homes.

Mytchett

Completions and commitments

5.4.63 There has been eight completions since the start of the plan period, and 254 homes have permission.

SLAA sites

5.4.64 The SLAA identifies capacity at two sites for a total of 23 homes, namely:

- **Site 912** – is located in a sensitive location, strongly associated with the River Blackwater valley; however, there is no priority habitat intersecting the site, and there appears to be the potential to deliver a homes on a small part of the site whilst avoiding the flood risk zone. Open land subject to flood risk in this area appears not to be accessible (the Blackwater Valley Path is on the far side of the A331), so the potential to increase accessibility to the open greenspace in this area will need to be explored.
- **Site 1000** – is a smaller site, with the SLAA supporting just seven homes, but is similarly sensitive on account of its close association with the Blackwater Valley. The site is adjacent to open access land associated with a lake and recreational uses (accessible from the Blackwater Valley Path), which is also a designated SNCI, and the site is shown as mostly comprising woodland priority habitat. Also, the SLAA explains: *“The site is currently located within Flood Zone 1. However, the modelling in the Surrey Heath Strategic Flood Risk Assessment 2020 indicates that the site will fall almost entirely within Flood Zone 3a in the 2080s. This should be taken into consideration in any forthcoming planning application.”*

Discounted sites

5.4.65 There is only one discounted site, namely **Site 867**, which is discounted due to availability concerns.

Conclusion

5.4.66 On the basis of the discussion above it is evident that, in addition to a scenario involving support for the two SLAA sites, there is potentially merit to exploring a lower growth scenario involving removing or revising down the capacity of one or both SLAA sites. This reflects the importance of careful planning for the Blackwater Valley as a key green and blue infrastructure asset, and sensitive part of the Borough from a climate change resilience perspective. However, there is no way to easily define a lower growth scenario, and the total number of homes involved is small. As such, and on balance, it is reasonable to progress just **one growth scenario** to Section 5.5, namely a scenario that sees support for both SLAA sites for a total of 23 homes.

West End

Completions and commitments

5.4.67 There have been 220 completions since the start of the plan period, and 20 homes have permission.

SLAA sites

5.4.68 The SLAA identifies four sites with a total capacity of 96 homes, of which one is large enough to warrant an allocation, namely **Site 178** (Land east of Benner Lane), which has a capacity of 73 homes, and would expand a recently completed large scheme. A high proportion of the site comprises priority woodland habitat. However, the SLAA explains that the site is allocated as a housing reserve site in the Local Plan (saved policy H8). The scheme would complete the expansion of West End to the east as far as the Green Belt, and a primary school is adjacent, although West End local centre is over 500m distant.

5.4.69 With regards to the final three sites:

- **Site 153** – is located within the Green Belt, but the SLAA explains: “... *there could be scope for limited development on... part of the site... providing it would have no greater impact than the existing development on the openness of the Green Belt.*” The SLAA goes on to explain: “*It is advised that the site as a whole could accommodate 74 units. However... it is considered the site could accommodate 7 net residential units.*”

- **Site 799** – is a notably sensitive site. The SLAA explains:

“The site is PDL and wholly within the Green Belt... The northern extent of the site is within flood zone 3 and the remaining area is entirely within flood zone 2. The site forms part of a wider gap between the settlements of West End and Bisley [and the] site falls partly within a Biodiversity Opportunity Area...

... The site... has existing structures present. As such, there could be scope for limited development on this area of the site... providing it would have no greater impact... on the openness of the Green Belt.”

... The submission advised that the site could have a capacity of 60 dwellings. However... the estimated capacity has been reduced to 6.”

- **Site 840** – is a small site for ten homes adjacent to Site 178, and give rise to limited issues.

Discounted sites

5.4.70 There are total of five discounted sites, all of which are located in the Green Belt. However, two of these sites - namely **Sites 374** and **914** - can be ruled out at this stage due to being poorly related (beyond 50m) to the settlement boundary (once account is taken of a potential expanded boundary to reflect Site 178).

5.4.71 With regards to the remaining two sites – **Sites 813** and **913** - there are a range of issues and constraints, but no absolute constraints that serve to rule the site out of contention at this stage in the process.

5.4.72 Finally, there is a need to further consider **Sites 153** and **799**. The SLAA identifies capacity for limited development without Green Belt release. However, for the purposes of exploring higher growth scenarios it is reasonable to explore the possibility of more extensive development within the site boundary.

Conclusion

- 5.4.73 There are **two reasonable growth scenarios** for West End (over-and-above completions/commitments):
- 1) 96 homes across the four SLAA sites; and
 - 2) Scenario 1 plus one or more allocations necessitating Green Belt release (see Section 5.5).
- 5.4.74 With regards to a lower growth scenario, there is a need to carefully consider the appropriateness of supporting housing at Site 799 given its location in flood risk zone 2, also mindful that West End is set to see relatively high growth over the plan period. However, on balance there is a no reasonable need to formally explore a lower growth scenario for West End through the appraisal of Borough-wide scenarios. As per other sub-areas discussed above as being associated with one reasonable growth scenario to progress to Section 5.5., there is the potential to explore the merits of lower growth in Part 2 of this report.

Windlesham

Completions and commitments

- 5.4.75 There have been 12 completions since the start of the plan period, and 173 homes have permission.

SLAA sites

- 5.4.76 The SLAA identifies three sites with a total capacity of 36 homes. Taking these in turn:
- **Site 844** – The SLAA explains: *“The site is densely wooded and is wholly within a TPO. The site was previously submitted for 20 dwellings as part of the Call for Sites exercise. Due to the sites constraints it is considered that a low density development is suitable for the site [9 homes].”*
 - **Site 834** – comprises a collection of buildings associated with Broadway Green Farm, seemingly including older farm buildings and some more modern industrial units. The site is located in the Green Belt between Lightwater and Windlesham, but the SLAA explains the potential to deliver seven homes without Green Belt release. Considerations relate to accessibility (there is a footpath along the road to Lightwater, but this is narrow and near non-existent over the bridge crossing the Windle Brook); heritage (a collection of farm buildings is shown on the pre-1914 OS map); flood risk (there is the potential for built form to avoid the Windle Brook flood risk zone, but there is also a need to consider safe access/egress); and employment (potentially important rural industrial / workshop / office space).
 - **Site 1004** – the SLAA explains: *“The current planning application... is for 34 dwellings. However, given the TPO on half of the site, the site’s estimated capacity potential has been reduced to 20.”*

Discounted sites

- 5.4.77 There are a total of seven discounted sites, all of which are located in the Green Belt bar **Site 765**, which has availability concerns. Of the six Green Belt sites, one now has planning permission, namely **Site 445**, which is currently a garden centre located along the A30 to the east of the village; and another is not available, namely **Site 276**. With regards to the remaining three sites – **Sites 609, 809 and 915** - there are a range of issues and constraints, but no absolute constraints that serve to rule the site out of contention at this stage in the process.
- 5.4.78 Finally, there is a need to further consider Site 834, at which the SLAA identifies capacity for limited development without Green Belt release. The possibility of more extensive development within the site boundary could feasibly be explored, which would necessitate Green Belt release; however, on balance, this is not considered to be a reasonable option, given the issues with the site discussed above.

Conclusion

- 5.4.79 There are **two reasonable growth scenarios** for West End (over-and-above completions/commitments):
- 1) 36 homes across the four SLAA sites; and
 - 2) Scenario 1 plus one or more allocations necessitating Green Belt release (see Section 5.5).
- 5.4.80 With regards to a lower growth scenario, there is a need to carefully consider the merits of housing at Site 834 given the issues discussed. However, on balance there is a no reasonable need to formally explore a lower growth scenario for Windlesham through the appraisal of Borough-wide scenarios. The merits of lower growth can be explored in Part 2 (Section 9) of this report, namely the Draft Plan appraisal.

5.5 Reasonable growth scenarios

Introduction

- 5.5.1 Having gone through a process (see Figure 5.1) involving consideration of strategic issues/options (Section 5.2), site options (Section 5.3) and sub-area scenarios (Section 5.4), the final task is to draw together the understanding generated in order to arrive at a single set of reasonable growth scenarios.
- 5.5.2 In practice, this involves considering ways of combining the sub-area specific site scenarios introduced above. Additionally, supply from the sub-area scenarios is combined with:
- **Completions** – 728 homes have already been completed since the start of the plan period;
 - **Commitments** – 2,424 homes are anticipated at consented sites (detailed or outline);²¹
 - **Windfall allowance** – 457 homes can be anticipated to come forward, through the development management process, at sites neither with planning consent nor allocated in the plan.
- 5.5.3 Total supply from the above sources is 3,609 homes, which is a figure ~2,070 homes short of the 5,680 homes figure that is discussed in Section 5.2 as the “adjusted average housing need figure” and the **housing requirement** figure that reasonable growth scenarios should be primarily focused on.
- 5.5.4 Additionally, as discussed in Section 5.2, there is a need to ensure a **supply buffer**, i.e. a total supply in excess of the requirement. As such, there is a need to primarily focus on combinations of sub area scenarios that would deliver *in excess of* 2,070 homes.
- 5.5.5 With regards to **lower growth scenarios**, Section 5.2 explains that there is a strategic argument for exploring scenarios of this nature, given the extent of constraints that exist. However, having gone through a process of exploring site options and sub-area scenarios in Sections 5.3 and 5.4, the conclusion is that there is no reasonable need to define and appraise lower growth scenarios mindful of the potential to explore the merits of lower growth in Part 2 of this report). The minimum number of homes achieved by combining the sub-area scenarios is 2,473 homes, i.e. a figure comfortably in excess of 2,070 homes.
- 5.5.6 With regards to **higher growth scenarios**, Section 5.2 explains that there is a strategic argument for exploring scenarios of this nature, particularly given affordable housing needs. Furthermore, having gone through a process of exploring site options and sub-area scenarios in Sections 5.3 and 5.4, it is clear that reasonable higher growth scenarios do exist, i.e. *do* warrant being formally defined and appraised.

N.B. there is a question whether higher growth scenarios should be underpinned by an assumption that the housing requirement would be increased, the supply buffer increased, or both. This matter is returned to below.

Combining sub area scenarios

- 5.5.7 Reasonable scenarios for each sub-area are presented in Table 5.1, which is a summary of the sub-area specific conclusions presented in Section 5.4. There are two important points to note:
- **Smaller Green Belt release sites** – in Section 5.4 the discussions for Bagshot, Bisley, Chobham, West End and Windlesham identify a shortlist of 18 sites with a theoretical capacity in the region of 1,000 homes. However, in practice, even under a scenario whereby there is a clear strategic argument for Green Belt release, some or perhaps even all of these sites might be identified as unsuitable for allocation upon further investigation and/or the capacity at some or perhaps even all of these sites might be identified as significantly lower than the theoretical capacity. As such, within the ‘Scenario 2’ column of Table 5.2, and moving forward within this report, the assumption is that ~800 homes would come forward across some or all of the sites.
 - **Fairoaks Airport** – the figure presented in the ‘Scenario 3’ column for Chobham assumes allocation of Fairoaks Airport, which would deliver ~1,000 homes in the plan period (see further discussion below).

²¹ This figure is arrived at by totalling the capacity of committed sites (2,440) and then applying a 3% ‘lapse rate’ discount.

Table 5.1: Sub-area scenarios

Sub-area		Number of homes in the plan period [Over-and-above completions, commitments and windfall]		
		Scenario 1	Scenario 2 <i>Scenario 1 plus...</i>	Scenario 3 <i>Scenario 1 plus...</i>
West of the Borough (plus Lightwater minus Bagshot)	Camberley town centre	1,226	-	-
	Camberley wider area	265	-	-
	Deepcut	138	-	-
	Frimley	215	-	-
	Frimley Green	177	-	-
	Lightwater	17	-	-
	Mytchett	23	-	-
East of the Borough (plus Bagshot minus Lightwater)	Bagshot	134	~800 homes at some or all of the 18 Green Belt site options shortlisted in Section 5.4.	-
	Bisley	32		-
	Chobham	114		1,000
	West End	96		-
	Windlesham	36		-
Total		2,473	Scenario 1 + ~800	Scenario 1 + 1,000

- 5.5.8 The starting point is a borough-wide scenario comprising Scenario 1 for each sub-area. To recap, under this scenario the assumption is that supply – over-and above completions, commitments and windfall – would come from all of the sites identified as deliverable or developable by the SLAA. All of these sites are either located within an existing settlement boundary, within the CBGB or at a site in the Green Belt where there is the potential for development without Green Belt release. Under this scenario there would be no Green Belt release aside from inseting Chobham village (see discussion in Appendix IV).
- 5.5.9 This is borough-wide reasonable **growth scenario 1**. Under this scenario the total potential supply deliverable or developable SLAA capacity would be 2,473 homes. After adding supply from completions, commitments and windfall (3,609 homes), the total potential supply would be **6,082 homes**, which is a figure 7% above the average adjusted housing need figure.
- 5.5.10 Borough-wide reasonable **growth scenario 2** is then naturally scenario 1 plus “~800 homes at some or all of the 18 Green Belt site options shortlisted in Section 5.4.” As discussed, at this stage in the plan-making process it would not be appropriate, or reasonable, to explore higher growth scenarios defined in terms of specific smaller Green Belt sites for release. Under this scenario the total potential supply would be 6,082 + 800 homes = **6,882 homes**, which is a figure 21% above the average adjusted housing need.
- 5.5.11 Borough-wide reasonable **growth scenario 3** is then naturally scenario 1 plus additional allocation of Fair Oaks Airport (or ‘Fair Oaks’). Fair Oaks is associated with a range of issues, but does include an element of PDL, and is being promoted as a ‘Garden Village’ (GV). Total capacity of the site, on the basis of latest work completed by the site promoters, is “at least 1,500 homes”, but a safe assumption (given delivery risks and uncertainties) is that ~1,000 homes would come forward in the plan period. Therefore under this scenario the total potential supply in the plan period would be 6,082 + 1,000 homes = **7,082 homes**, which is a figure 25% above the average adjusted housing need figure.

5.5.12 The above discussion leads to three reasonable growth scenarios, which are presented in Table 5.2 and across the subsequent maps. These are considered to be the ‘reasonable’ growth scenarios, for appraisal and consultation, at the current time. This is on the basis of the process set out across this section of the report as a whole (as summarised in Figure 5.1). Final points to note are as follows:

- There is invariably a need to make simplifying assumptions in order to arrive at a manageable number of scenarios for appraisal, and in the case of Local Plan growth scenarios (defined to a level of detail in line with plan objectives) it is fair to say that there is a need for major simplifying assumptions. It should be noted that *“the phrase all reasonable alternatives does not equate to all conceivable alternatives.”*²²
- There is not considered to be a need to consider a scenario involving fewer homes than Scenario 1 at this current stage, but that is not to suggest that there are not issues/impacts associated with certain of the sites supported under this scenario. These issues/impacts are explored through the appraisal below (Sections 6 and 9) and, in light of the appraisal (and consultation responses received) the Council might reasonably consider a lower growth scenario when finalising the plan for publication (Regulation 19).
- With regards to Scenario 2, as discussed, this scenario is defined without specifying precisely which Green Belt sites would be allocated and the precise capacity of each. Uncertainty regarding site-specifics is an appraisal limitation, in that it leads to uncertainty around significant effects, but it is an unavoidable reflection of the stage of the plan making process. There will be the potential to revisit reasonable growth scenarios subsequent to the current consultation, drawing upon the latest evidence, including consultation responses received, and further technical work as necessary.
- As discussed, under Scenarios 2 and 3 there is a question-mark regarding whether the housing requirement would be set at a figure above 299 dpa / 5,680 homes, or whether the housing requirement would remain at 299 dpa (as per Scenario 1) but the supply buffer would increase. At this stage the assumption is that the housing requirement would remain at 299 dpa.

Table 5.2: The reasonable growth scenarios (with constants greyed-out)

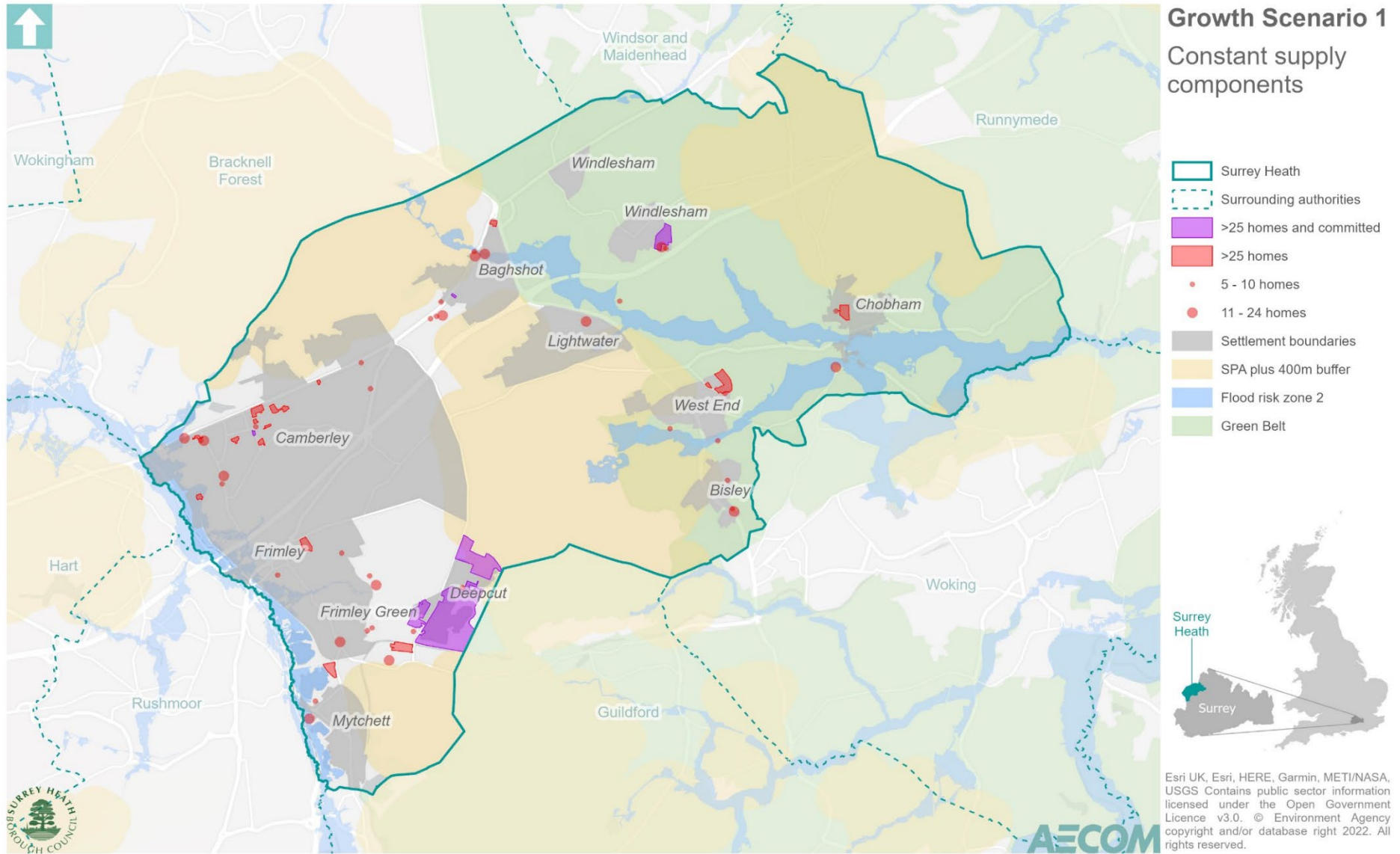
Supply component	Growth scenario 1 Constant supply components	Growth scenario 2 Constant supply components + smaller GB sites	Growth scenario 3 Constant supply components + Fairoaks GV
Completions & commitments	3,152	3,152	3,152
Windfall	457	457	457
SLAA sites	2,473	2,473	2,473
Package of smaller GB sites	-	800	-
Fairoaks Garden Village	-	-	1,000
Total supply (2019-2038)	6,082	6,880	7,082
% above 299 dpa	7%	21%	25%

5.5.13 With regards to the maps presented below, notes are as follows:

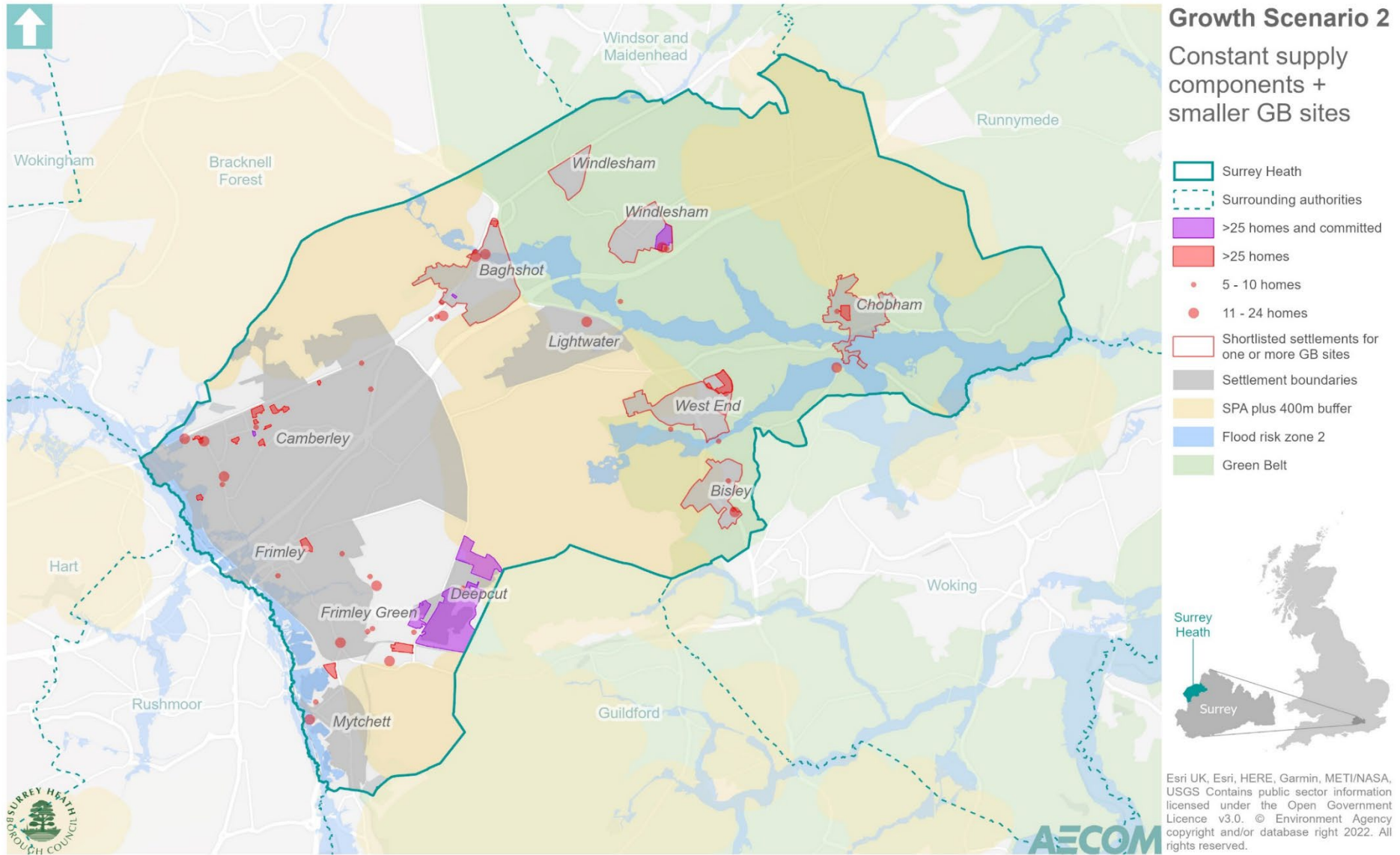
The aim is to show simplified environmental constraints, to enable proposed development sites (both allocations and other sites identified as deliverable or developable in the SLAA) to clearly stand-out. In particular, this means that the maps do not differentiate between the SPA and the SPA 400m buffer, nor do they show the other designations that overlap the SPA, namely SSSI (all the SPAs are also SSSI) and SAC (most are also SAC). Also, the maps do not show the Basingstoke Canal (the only SSSI in the Borough not designated as SPA; also a conservation area; a notable constraint to growth at Deepcut), nor do they shown SNCIs or heritage constraints, which together heavily constrain much of the CBGB. With regards to Green Belt, the maps do serve to show where this intersects the SPA plus 400m buffer.

²² See <https://www.aylesburyvaledc.gov.uk/sites/default/files/VALP/VALP%20Report.pdf>

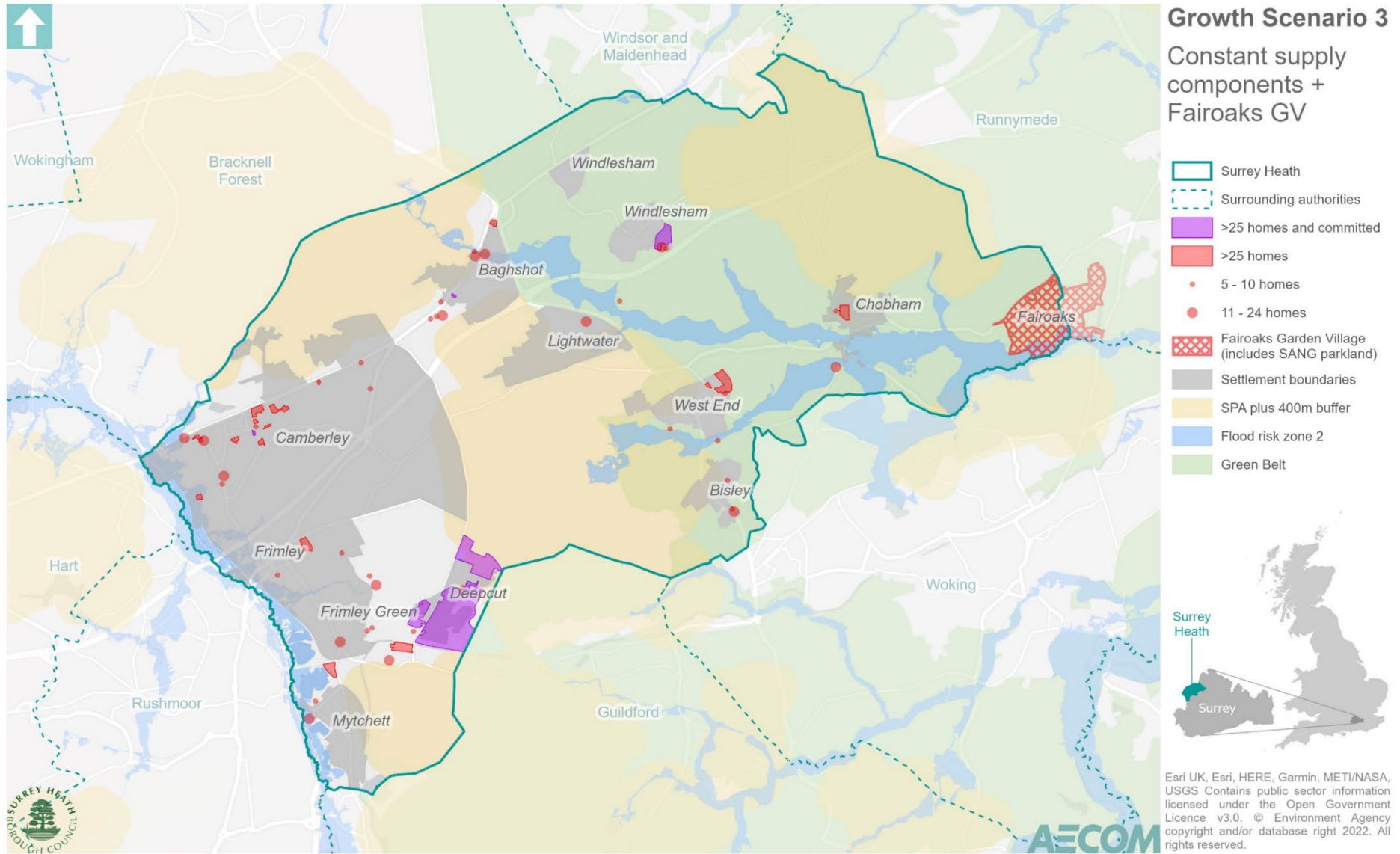
Reasonable growth scenario 1: Constant supply components (i.e. all sites identified as deliverable or developable by the SLAA)



Reasonable growth scenario 2: Scenario 1 plus ~800 homes at some or all of the 18 Green Belt site options shortlisted in Section 5.4



Reasonable growth scenario 3: Scenario 1 plus Fairoaks Garden Village (at least 1,500 homes in total, with 1,000 assumed in the plan period)



6 Growth scenarios appraisal

6.1 Introduction

6.1.1 The aim of this section is to present an appraisal of the reasonable growth scenarios introduced above. Table 6.1 presents the growth scenarios in summary.

Table 6.1: The reasonable growth scenarios – summary

Scenario	Distribution	Total potential supply
1	Constant supply components	6,082
2	Constant supply components + Package of GB sites	6,882
3	Constant supply components + Fairoaks	7,082

6.2 Appraisal methodology

6.2.1 Summary appraisal findings are set out in Table 6.1, which comprises: 13 rows - one for each of the topics that comprise the core of the SA framework (see Section 3); and 3 columns (one for each of the growth scenarios). For each of the sustainability topics in turn, the aim is to both categorise the performance of each of the reasonable growth scenarios in terms of significant effects (using **red** / **amber** / **light green** / **green**)²³ and rank the reasonable growth scenarios in order of preference.

6.2.2 In accordance with the SEA Regulations, for each scenario, the primary aim is to “identify, describe and evaluate” significant effects on the baseline in respect of each element of the established appraisal framework in turn. Equally, the aim is to differentiate effectively, regardless of significant effects. Conclusions on significant effects and relative performance are reached on the basis of available evidence and understanding of key issues and opportunities, mindful of guidance. The aim is to balance, on the one hand, the need for structured and systematic appraisal with, on the other hand, the need for conciseness and readability. As part of this, the appraisal narratives omit unnecessary discussion of ‘non-issues’, i.e. issues in terms of which it is not possible to either reach conclusions on significant effects or meaningfully differentiate between the performance of the scenarios.

6.2.3 Further points to note are as follows:

- Scenario 1 – the aim is to present a high level discussion, in the knowledge that all of the sites that feature within this scenario are a constant across the three scenarios (i.e. it is not possible to differentiate between the scenarios on the basis of issues/impacts associated with these sites) and are a focus of detailed appraisal in Part 2 (Section 9) of this report.
- Scenario 2 – it is important to reiterate that this scenario is unavoidably defined in somewhat high level terms, in that the identified sites are best described as a shortlist, and there is little or no certainty regarding the approach that might be taken to development. It has not been possible to take account of materials submitted by site promoters in respect of masterplanning etc.
- Scenario 3 – a key consideration is the extent to which it is appropriate to take account of the extensive materials submitted by the site promoter. As this is a strategic site there is certainly a need to take site specific proposals into consideration, e.g. in respect of masterplanning and the proposed approach to directing limited funds to measures aimed at mitigation and ‘planning gain’ (e.g. affordable housing). However, there is a need to apply caution, as site specific proposals are subject to change.

A related consideration, in respect of Scenario 3, is the extent to which it is appropriate to take account of materials submitted as part of the planning application process for a 1,000 home scheme at Fairoaks (ref. [18/0642](#)), which was submitted in 2018 before being withdrawn in February 2020. It is appropriate to be mindful of issues and opportunities discussed as part of the planning application process, however there is a need to apply caution given the specific nature of the scheme under consideration.


²³ **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. No colour indicates a neutral effect.

6.3 Appraisal findings

6.3.1 The growth scenarios are appraised below under the 13 topic headings introduced in Section 3, before a final section presents summary findings. To reiterate:

Under each of the topic headings the aim is to both categorise the performance of each of the reasonable growth scenarios in terms of significant effects (using **red** / **amber** / **light green** / **green**) and rank the reasonable growth scenarios in order of preference (where 1 is best performing; highlighted with a star).

Accessibility (to community infrastructure)

Growth scenario 1 Constant supply components	Growth scenario 2 Constant supply components + smaller GB sites	Growth scenario 3 Constant supply components + Fair Oaks GV
	3	2

- 6.3.2 Beginning with **Scenario 1**, the fact that the great majority of supply is from sites located within existing settlement boundaries serves to indicate a tendency toward relatively accessible locations; and there is a clear focus of growth at Camberley, Frimley and Frimley Green, which are the parts of the Borough that benefit from highest levels of accessibility. Also, across the villages the primary focus of growth (both 'new' sites and in total) is at Bagshot (which benefits from a district centre and public transport connectivity) and at Deepcut (where new community infrastructure is coming forward as part of the Princess Royal Barracks strategic scheme). However, there are several small sites within the CBGB and the Green Belt that are not adjacent to a settlement boundary, most notably sites at Deepcut, south of Bagshot and Site 834 between Lightwater and Windlesham, albeit the identified capacity at these sites is mostly very low. Matters are explored further in Section 9.
- 6.3.3 With regards to **Scenario 2**, there is a degree of concern, because: A) none of the sites in question are thought likely to deliver new strategic community infrastructure (i.e. infrastructure that serves to address an existing need / significantly benefit the existing community); and B) the effect would be that a significantly higher proportion of the overall Local Plan growth strategy would be directed towards villages without a district centre or a rail station, namely Bisley, Chobham, West End and Windlesham. Directing growth to villages can be beneficial where there is a need to support the viability of existing centres and community services/facilities, but no such opportunities have been highlighted in this instance (to date).
- 6.3.4 A particular concern could potentially relate to a higher growth strategy at Windlesham, given the lack of a primary school (there is an infant school for children aged 4 – 7 at Snows Ride) and poor links between Snows Ride (which could potentially see a significant proportion of growth) and the main village core, where local centre is located. Certain other sites are also somewhat peripheral, including sites to the east of Chobham, and the identified site at Bagshot (Site 736) is separated from the village by the A322.
- 6.3.5 Finally, with regards to **Scenario 3**, a primary consideration is that there would be the opportunity to deliver new community infrastructure alongside new housing, which is an opportunity to be realised as far as possible. This is one of the key reasons why there is support nationally for growth at scale, including garden villages. For example, paragraph 72(b) of the NPPF (2019) supports "larger scale development" provided: "... size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access". There is a range of community infrastructure that can potentially be delivered alongside housing, ranging from lower order (e.g. a primary school) to higher order (e.g. a secondary school). New strategic community infrastructure can sometimes be delivered that also contributes to meeting the needs of existing community.
- 6.3.6 In the case of Fair Oaks GV, the proposal is for a relatively small scheme, in comparison to other garden villages nationally, and this reflects strongly on the potential community infrastructure 'offer'. The current Vision Document states: "*The scheme will be designed to enable a whole new way of life, one that's sustainable, healthy, convenient and community focused. Fair Oaks will be an exemplar development of the highest standards – a place where people genuinely want to live, work and play.*" It also proposes a "*self-sufficient place where needs for work, leisure, living and social interaction are largely met on site.*"

6.3.7 Specific proposals include:


- a 2 form entry primary school, with space to expand to 3 forms of entry in the future if required;
- a local centre (co-located alongside the primary school) to include a community centre, community café, pub, flexible co-working space with hot desking provision and pick-up / drop off for online deliveries; and
- a sports hub with multi-use playing pitches and a pavilion building.

6.3.8 However, it is important to question the extent to which ‘self-sufficiency’ (mentioned five times in the Vision Document) would be achieved. Whilst the nearest comparable scheme – Longcross GV – is of a very similar scale, it benefits from a rail station, which serves to reduce concerns regarding offsite trips (although concerns remain, as discussed further below). Other schemes tend to be larger, with a critical mass achieved that enables delivery of community infrastructure over-and-above that proposed for Fairoaks GV. For example, the committed Wisley Airfield scheme (c.2,000 homes), in Guildford Borough, is set to deliver a secondary school, whilst all three of the case-studies presented within the Fairoaks Vision Document involve significantly larger schemes, ranging from 2,500 homes to 3,600 homes.

6.3.9 Given that the scale of the scheme will undoubtedly limit self-sufficiency and trip internalisation, the next point to consider is links to offsite higher order community infrastructure, for example secondary schools. In broad terms, it is fair to highlight that the site benefits from close proximity to Woking town centre; however, there are a range of detailed matters that will require further investigation, most notably in respect of transport links (a focus of discussion below), but also in respect of existing community infrastructure capacity. There would be a need to work closely with Surrey County Council and other partner organisations to carefully consider matters relating to access to community infrastructure.

6.3.10 In **conclusion**, there is a clear concern regarding Scenario 2 (package of smaller GB sites), and it is appropriate to flag ‘a negative effect of limited or uncertain significance’. It is difficult to differentiate the other two scenarios, as whilst Fairoaks would involve delivering new community infrastructure alongside housing, the proposed scheme is small for a Garden Village, which limits the potential to achieve self-sufficiency, and there are issues with links to Woking. On balance it is judged appropriate to highlight Scenario 1 as preferable, although there is some uncertainty. Neutral effects are predicted for these two scenarios (N.B. see further discussion of Scenario 1 in Section 9, where close consideration is given to proposed development management policy).

Air quality

Growth scenario 1 Constant supply components	Growth scenario 2 Constant supply components + smaller GB sites	Growth scenario 3 Constant supply components + Fairoaks GV
	2	2

6.3.11 This is an important consideration locally, given a number of designated Air Quality Management Areas (AQMA), notably affecting the centres (all outside of Surrey Heath Borough) of Knaphill, Woking and Addlestone (plus the M3 corridor through Camberley), albeit air quality is set to improve over coming years as the number of petrol and diesel vehicles on the road decreases. Moreover, there are potential impacts on the TBHSPA as a result of any additional vehicle movements in proximity to sensitive habitat (associated with nitrogen and ammonia deposition from vehicles), however this is covered under the biodiversity section.

6.3.12 Beginning with **Scenario 1**, the first point to note is that none of the proposed sites intersect an AQMA; however, several are in proximity to either the M3 or the A322 dual carriageway, which could suggest a risk of problematic air and/or noise pollution, plus there is a need to consider other potential pollution sources, including railway lines and employment uses. With regards to the risk of growth leading to traffic through an AQMA, or otherwise exacerbating or creating problematic air and/or noise pollution, it is difficult to draw strong conclusions ahead of detailed traffic modelling. However, there will clearly be a need to ensure that a relatively high growth strategy for the western urban area does not lead to issues. Matters are explored further in Section 9.

- 6.3.13 With regards to **Scenario 2**, it is difficult to suggest that there would be significant additional traffic through an AQMA. However, there could be pressure to allocate one or more sites adjacent to the M3 and/or the A30, such that new homes could experience a degree of air and/or noise pollution. Furthermore, higher growth at any of the Green Belt settlements in the east of the Borough would likely generate traffic along one of the a-roads that pass through the centre of village centres / residential areas, and also potentially Camberley bound traffic along more minor roads (matters relating to traffic are considered further below).
- 6.3.14 Finally, with regards to **Scenario 3**, the Fairoaks Vision Document includes a section on air quality, but does not discuss nearby AQMAs, nor any other location specific issues or opportunities. The A319 is not constrained by any AQMA (although the road does pass through the centre of Chobham), nor is the A320 between Woking and the M25; however, a concern could potentially relate to journeys along the A320 that pass through the AQMA south of Woking. Looking beyond the designated AQMA, the effect of Runnymede Local Plan allocations in combination on air quality along the A320 corridor was a focus of the Local Plan Examination, with paragraph 278 of the Inspector's Report concluding that mitigation measures will lead to an overall "neutral" impact; however, there is a need to consider the risk of additional growth through the Surrey Heath Local Plan leading to problematic air quality along the A320, e.g. affecting Ottershaw. It is noted that no air quality concerns were raised as part of the planning application process for a smaller (1,000 home) scheme at Fairoaks in 2019.
- 6.3.15 In **conclusion**, it is fair to highlight a risk of impacts under Scenarios 2 and 3 over-and-above Scenario 1, although concerns are of limited significance. Neutral effects are predicted for all three scenarios.

Biodiversity

Growth scenario 1 Constant supply components	Growth scenario 2 Constant supply components + smaller GB sites	Growth scenario 3 Constant supply components + Fairoaks GV
★ 1	2	2

- 6.3.16 Biodiversity is a centrally important constraint to growth in Surrey Heath, given the Borough's close association with the internationally important Thames Basin Heaths Special Protection Area (TBHSPA).
- 6.3.17 Beginning with **Scenario 1**, the first point to note is that whilst all proposed sites are beyond the 400m TBHSPA buffer zone, several are located not far beyond this zone. There is confidence in the strategy for avoiding and mitigating effects, and this matter is a focus of detailed consideration through a stand-alone Habitats Regulations Assessment (HRA); however, there will be a need for further detailed consideration following consultation with Natural England and other organisations with an interest in the SPA and wider matters relating to biodiversity, nature recovery etc.
- 6.3.18 The next matter for consideration is then the risk of impacts to the nationally designated Basingstoke Canal SSSI, with two sites wholly or partly adjacent. However, these schemes are modest in scale, and low proposed densities serves to indicate good potential to maintain the mature trees onsite, particularly those adjacent to the canal. A design cue might be taken from the nearby committed Princess Royal Barracks strategic site, which is delivering a woodland buffer between new homes and the canal.
- 6.3.19 The next matter for consideration is growth in proximity to locally designated Sites of Nature Conservation Importance (SNCIs), including one site at Deepcut that is adjacent to the extensive woodland SNCI between Deepcut and Frimley (mostly MOD land), and it is noted that this site includes extensive tree cover. However, this is a small site for just 17 homes. There is also a sensitivity along the Blackwater Valley at Mytchett.
- 6.3.20 Finally, there is a need to consider sites intersecting woodland priority habitat or tree preservation orders (TPOs) or otherwise with extensive tree cover. There are several such sites, most notably at Deepcut.

- 6.3.21 With regards to **Scenario 2**, a primary point to note is that identified sites to the south of West End / north of Bisley (Site 153 and 902) intersect the TBHSPA 400m buffer, and one of the sites currently comprises open space. However, new homes would be outside the buffer and SANG capacity can be assumed,²⁴ plus there is a good network of Local Nature Reserve (LNR) in this area, which potentially serves to reduce concerns around recreational pressure. Furthermore, with regards to SPA proximity: two shortlisted sites at Chobham (Sites 916 and 918) are adjacent to the 400m zone, and this an accessible part of the SPA (Chobham Common), albeit managed as a National Nature Reserve (NNR); and a site south of Bisley (Site 800) is in proximity to the 400m buffer, although it seems that the SPA here has limited accessibility, and Bisley Common is nearby which, is open access land (also an SNCI).
- 6.3.22 There are a range of other concerns associated with the identified sites given onsite mature woodland/ forestry/ trees or hedgerows that potentially contributes to landscape-scale ecological functioning, including sites at West End and Chobham, where the woodland is shown as priority habitat by the nationally available dataset, although not ancient woodland or locally designated. A final consideration is the risk of sites at West End / Bisley and Chobham impacting in-combination on the River Bourne corridor'; however, equally, there could be the potential for development to support some targeted (albeit limited) habitat enhancement or creation.
- 6.3.23 Finally, with regards to **Scenario 3**, the Vision Document includes a range of detailed proposals to avoid and mitigate the risk of impacts to nearby Horsell Common, which forms part of the TBHSPA, including a proposal to deliver a large SANG that will likely also be of a high quality (being associated with a river valley and a former parkland). On this basis, it should be possible to sufficiently mitigate recreational impacts on the TBHSPA, despite the close proximity (the site is just beyond the established 400m buffer).
- 6.3.24 There does also appear to be a good opportunity to deliver well-targeted new habitat creation onsite, including new wetland habitats within the river corridor and new heathland elsewhere, although habitat creation proposals warrant further detailed scrutiny, e.g. it seems potentially ambitious to suggest that new heathland will be created that is capable of supporting SPA qualifying bird populations.
- 6.3.25 However, concerns do remain regarding impacts to Horsell Common, given that pedestrians, cyclists and motorists moving between the site and Woking will need to pass through or adjacent to it, and noting that the part of Horsell Common SSSI closest to Fairoaks is in 'unfavourable recovering' condition (albeit there is only one better condition status, namely 'favourable'). For example secondary school and sixth form / college students might drive, cycle or walk between the site and Woking on a daily basis. In turn, there could be a risk of impacts such as air pollution, disturbance, littering and wild fires. There could also be a risk of more direct impacts, given the possibility of "pedestrian/cycle works" within the SPA, to link the site to Woking. This would be a matter to explore through HRA ahead of any allocation.
- 6.3.26 Also, a secondary concern is in respect of the north-eastern part of the proposed settlement area, which will impact on a significant area of land with a clear former parkland character, with mature tree belts / inter-linked copses and many individual mature trees. None of this woodland is locally designated (either by Surrey Heath or Runnymede), but much of it comprises priority habitat, one very small patch comprises ancient woodland, and there is a need to consider functional links with the extensive areas of woodland and parkland to the north of the A319, much of which is locally designated. It is clear that the proposed masterplan aims to avoid areas of greatest sensitivity, and the Vision Document proposes "*reinforcing existing natural features such as trees and hedgerows*", however, a degree of concern does remain, and it is noted that the Woodland Trust raised detailed concerns as part of the planning application process for a proposed smaller scheme in 2019 (ref. [18/0642](#)). Given these concerns, there is a need to scrutinise the suggestion made within the Vision Document that habitat creation onsite will serve to enhance the function of the site as a 'stepping stone' within the wider landscape, e.g. helping to ensure ecologically connectivity between Chobham Common and Horsell Common.
- 6.3.27 Overall, the suggestion that the scheme would result in an "a major positive effect" on the SPA must be challenged. It is recognised that the new strategic SANG will not only draw new residents away from the SPA, but also existing residents of nearby communities, *possibly* leading to a net benefit in terms of recreational pressure; however, there are a range of other important considerations that must feed into an overall conclusion regarding net biodiversity impacts / extent of biodiversity net gain.

²⁴ It is unlikely, or at least unclear, that any of the sites could deliver onsite SANG, hence there would be a need to draw down capacity from offsite strategic SANG; however, there is relatively healthy strategic SANG capacity in the east of the Borough. Current capacity could not fully meet the need of 800 homes, but there are opportunities for SANG in this area.

6.3.28 In **conclusion**, there is an inherent concern with higher growth scenarios given the sensitive nature of the Borough as a whole, and concerns crystallise once consideration is given to the specific sites that might be supported under higher growth scenarios. Taking the scenarios in turn:

- Scenario 1 – there are concerns with a number of sites, including sites in proximity to the TBHSPA (albeit beyond 400m), Basingstoke Canal SSSI and SNCIs, and a number of sites intersect woodland or significant onsite trees. It is recognised that there also a number of site specific opportunities, as discussed further in Section 9, but at this stage it is appropriate to flag ‘a negative effect with limited or uncertain significance’.
- Scenario 2 - it does seem likely that under a scenario whereby there is a need to allocate land for around 800 homes in the Green Belt there would be pressure to deliver new homes in very close proximity or even adjacent to the TBHSPA 400m buffer, plus pressure to allocate sites associated with wider constraint. On this basis, it is appropriate to predict the likelihood of significant negative effects.
- Scenario 3 - there is a great deal of uncertainty, and the potential (both inherent to all strategic sites and specific to Fairoaks) to deliver strategic targeted enhancements is recognised, but on balance it is judged appropriate to flag the likelihood of a significant negative effect as per Scenario 2.

Climate change adaptation

Growth scenario 1 Constant supply components	Growth scenario 2 Constant supply components + smaller GB sites	Growth scenario 3 Constant supply components + Fairoaks GV
★ 1	2	★ 1

6.3.29 The primary consideration here is flood risk, with other climate change adaptation considerations (see discussion in [Appendix 1](#) of the Climate Change Study, 2020) considered under other topic headings.

6.3.30 With regards to **Scenario 1**, the primary point to note is that one site significantly intersects flood risk zone 3, namely Site 912 at Mytchett; however, the proposed capacity (16 homes) amounts to a low density (10.7 dph), hence it may be possible to avoid development in the most problematic parts of the site. The second point to note is that several sites modestly intersect flood risk zone 3, such that there is confidence in the ability to avoid built development in this zone.

6.3.31 There is also a need to consider flood risk zone 2, which should be avoided if possible, mindful of the risk of increased flood risk under climate change scenarios (see [Section 9](#) of the Climate Change Study, 2020). Several sites do significantly or entirely intersect this flood risk zone, hence there is a degree of concern, but it will be for the Environment Agency to comment in detail through the consultation.

6.3.32 A further consideration is surface water flood risk, with the primary consideration potentially surface water flood risk affecting Camberley town centre and land adjacent to the railway line that passes through the wider urban area. Another flood risk consideration can be the risk of development leading to increased surface water run-off and, in turn, increased downstream flood risk, but it is difficult to reach strong conclusions given potential to deliver sustainable drainage systems (SuDS). Matters are explored further in Section 9.

6.3.33 With regards to **Scenario 2**, an immediate concern is the concentration of shortlisted sites associated with the Bourne corridor south of West End / north of Bisley and sites to the southwest of Chobham, where the landscape is associated with the confluence of the Bourne and Windle Brook. It seems likely that, under this scenario, there would be significant pressure for additional housing within flood risk zone 2. With regards to surface water flood risk there are limited concerns, although there is a notable surface water flood risk channel that runs along the eastern edge of West End (Site 813). Also, the shortlisted site north of Bagshot (Site 247) intersects a surface water flood channel, and it is important to note that downstream is a residential area significantly affected by fluvial flood risk.

6.3.34 Finally, with regards to **Scenario 3**, the site is associated with the valley of the River Bourne and, correspondingly, there are several significant corridors of flood risk, where residential uses should be avoided, also mindful of the potential for flood risk zones to expand due to climate change. It could prove that there is good potential to avoid (and buffer) flood risk zones; however, the current masterplan shows

housing in very close proximity to current flood risk zone 2, which could warrant further attention (it is noted that “a detailed flood risk model was agreed with the Environment Agency as part of the previous planning application”). The current masterplan also shows a series of small water attenuation areas between the southern boundary of the proposed settlement and the River Bourne, and states that there will be the potential for “flood risk and river quality improvements”. Furthermore, through correspondence with the site promoters, it was confirmed that work completed in 2019 (as part of a planning application for a 1,000 home scheme) demonstrated “a substantial betterment beyond the required greenfield runoff rate and volume performance of the site”. However, there will be a need to scrutinise the level of ambition, ensuring that opportunities are taken to minimise and potentially reduce existing down-stream flood risk, noting areas within Addlestone that are affected by flood risk, and noting that draft revisions to the NPPF (2021) reflect an increased focus on “natural flood management techniques”.

6.3.35 In **conclusion**, at this stage, it is appropriate to flag a degree of concern with all scenarios, ahead of receiving detailed comments from the Environment Agency through the current consultation. With regards to Scenario 2, it does seem likely that, under any scenario whereby there is a need to allocate land for around 800 homes in the Green Belt there would be pressure to deliver new homes in flood risk zone 2. However, it is recognised that further detailed site selection and masterplanning could and would be completed to reduce concerns. With regards to Scenario 3, the site is strongly associated with a river corridor, but there would appear to be good potential to avoid development in the flood risk zone, and the potential for strategic flood water attenuation measures, to the benefit of locations downstream that experience flood risk, can be envisaged.

Climate change mitigation

Growth scenario 1 Constant supply components	Growth scenario 2 Constant supply components + smaller GB sites	Growth scenario 3 Constant supply components + Fairoaks GV
★ 1	3	2


6.3.36 The primary consideration here is per capita built environment emissions, given the potential to cover matters relating to transport emissions under other topic headings.

6.3.37 As discussed in Section 5.3, strategic growth locations can give rise to an opportunity to minimise built environment emissions, in particular by supporting heat networks and other measures to minimise regulated operational emissions (e.g. high fabric/efficiency standards, rooftop solar PV), but also potentially non-operational emissions (e.g. by supporting modern methods of construction, e.g. modular buildings) and possibly even unregulated operational emissions (i.e. emissions not covered by the building regulations, for example plug in electrical appliances). Strategic growth locations can also give rise to an opportunity to deliver high quality electric vehicle charging (see discussion in [Section 5](#) of the Climate Change Study), and potentially ‘smart energy systems’ that link heat networks / heat pumps, solar PV, power consumers and battery storage. Strategic growth locations can also potentially give rise to an opportunity to explore use of hydrogen for heating, and can potentially also support largescale renewable power generation, e.g. hydropower.

6.3.38 In light of these points, there is certainly a significant opportunity associated with the high growth strategy for Camberley town centre (**Scenario 1**), which the Climate Change Study suggests is potentially a “once in a century opportunity”. The second consideration is then the degree to which a new garden village at Fairoaks (**Scenario 3**) represents an opportunity. In short, at the current time it is not clear that there are any particular locational opportunities, nor is it clear that minimising built environment emissions is set to be a major focus as part of masterplanning or when making decisions in respect of funding priorities. There is a high-level commitment to “use of sustainable construction materials”, but little beyond this, with other statements non-committal; for example a submitted Climate Change note says nothing about regulated operational emissions other than: “Fairoaks will explore where it is viable to go beyond building regulations”. Also, the following statement regarding heat networks does not inspire confidence: “Fairoaks will review the feasibility to connect to existing or develop new heat network, including the opportunity for fifth generation heat networks.” There is a need to understand more about if and how the site promoter’s vision for a garden community at this particular location represents an opportunity to minimise per capita built environment emissions in Surrey Heath.

- 6.3.39 With regards to the wider package of identified sites that are a constant across the growth scenarios, and the shortlisted Green Belt sites that come into contention under **Scenario 2**, all are modest in scale such that there is little reason to suggest any particular opportunity. An important consideration locally is understood to be the extent to which grid constraints limit the potential to deliver high quality EV charging infrastructure; however, there is insufficient evidence to enable differentiation between sites in this respect. Another consideration is support for reuse of existing buildings, as opposed to demolition and rebuild.
- 6.3.40 In **conclusion**, there is a clear concern with Scenario 2 over-and-above Scenario 1, as none of the additional sites supported would likely give rise to any particular opportunity to minimise built environment emissions, and also noting that a dispersal strategy to village edge locations gives rise to issues in respect of car dependency and therefore transport-related greenhouse gas emissions. With regards to Scenario 3, there is much uncertainty at the current time; however, on balance, it is appropriate to conclude poor performance relative to Scenario 1, primarily on account of limited evident opportunity around built environment emissions, but also noting a concern around transport emissions.
- 6.3.41 With regards to significant effects, on one hand decarbonisation is a national and local priority; however, on the other hand, it is a global issue such that local actions can only have limited impact. On balance, it is appropriate to flag “a negative effect of limited or uncertain significance” under all scenarios, given the stretching nature of the Borough’s required decarbonisation trajectory. There is a need to ensure that every effort is made through spatial strategy and site selection.

Communities

Growth scenario 1 Constant supply components	Growth scenario 2 Constant supply components + smaller GB sites	Growth scenario 3 Constant supply components + Fair Oaks GV
2	3	1 

- 6.3.42 Aside from matters relating to access to community infrastructure and environmental quality/health, which have been discussed above, there are wide ranging other ‘communities’ related considerations that must feed into decisions around spatial strategy and site selection, including around ensuring good health, which is a national priority at the current time. With regards to the package of sites that are a ‘constant’ across the growth scenarios (**Scenario 1**), matters are considered in detail in Section 9, but headline considerations include:
 - Camberley town centre – in comparison to the proposal in 2018, the proposal is now to follow an ambitious approach to redevelopment at the two largest town centre allocations, namely London Road Regeneration Block (proposed for 336 homes in 2018, now proposed for 550 homes) and Land East of Knoll Road (100 homes in 2018, now 475 homes in the plan period), plus Camberley Station is proposed for additional homes (60 homes in 2018, now proposed for 75) and there is one new proposed allocation, namely Land east of Park Street (120 homes). As discussed in Sections 5.3 and 5.4, there is a major opportunity to regenerate and reimagine the town centre as a location to ‘live work and play’ as well as a hub for retail and services/facilities; however, there is a need to strike a balance, ensuring that the retail and community hub function is not lost or unduly eroded. There is also a need to consider density (including massing and building heights) from a design, place-making and health / wellbeing perspective, including in respect of enabling good light and access to greenspace. There is limited greenspace in the primary shopping area, but land east of Knoll Road does include greenspace (set to be protected).
 - Existing uses – the primary consideration is land east of Knoll road, which includes the Council offices, Camberley Library, the former Portesbery School and Hillside Resource Centre, Camberley Theatre, the Ian Goodchild Centre Camberley Care Trust, the Disability Initiative and Knoll Road Car Park. The proposal is to deliver a new “residential quarter to Camberley Town Centre”, hence there will need to be careful consideration given to relocating existing facilities. Also, the Camberley Centre is a new proposed allocation for 35 homes close to the town centre, and another site of note is Chobham Rugby Club. In all instances the proposal is to reprovide existing facilities off-site, but still within the Borough. There is a need for caution at this stage, with matters discussed in greater detail in Section 9.

- Access to greenspace – a high growth strategy for Camberley town centre and the wider urban area must deliver sufficient accessible greenspace to support the increased population. Elsewhere, there is a need to consider whether growth could support enhanced access to the countryside and areas of currently inaccessible woodland. For example, there is a focus of growth adjacent to a stretch of the Basingstoke canal where there is currently no public right of way, and there might be a focus on increasing accessibility to the countryside to the east of West End and/or Windlesham, where there is currently a low density of public rights of way and a lack of open access land.
- Sites outside of settlement boundaries – several small sites are identified as deliverable or developable by the SLAA that would be located outside of a defined settlement boundary, including to the south of Bagshot, north of Lightwater, south of Chobham and to the south of the Basingstoke Canal at Deepcut.
- Play facilities – there is a need to consider whether proposed sites are of a scale whereby there is the ability to deliver new play facilities onsite, as part of a framework of green and open space.

- 6.3.43 With regards to **Scenario 2**, a primary consideration is potentially the total growth quanta at West End, potentially to include expansion to the east beyond the extent of the reserve site in the Local Plan (saved policy H8), part of which has come forward over recent years, and the final part of which is proposed for (re)allocation under all scenarios. This eastern part of West End benefits from a primary school, but is some way distant from the local centre, hence there is an argument for limiting growth to allow time for recent/proposed new communities to integrate. Elsewhere at West End, under this scenario, there could also be several smaller allocations. As such, there is a concern around piecemeal expansion. Should there be a need for expansion of West End into the Green Belt there would be a clear argument for a strategic approach to growth that delivers new infrastructure to the benefit of the village, e.g. improved access to the countryside (e.g. to the east, or along the Bourn Brook) and/or a new local centre.
- 6.3.44 Conversely, the Snows Ride area of Windlesham potentially stands out as a location where there is a growth related opportunity, given the lack of a local centre, and given that this is the location of the largest of the shortlisted sites. It is not anticipated that growth could deliver a primary school, but it is possible to envisage new community infrastructure (e.g. a new play facility, or perhaps even a small local centre with a village hall) and/or new strategic greenspace to the benefit of the existing community.
- 6.3.45 A further consideration is that one of the shortlisted Green Belt sites under Scenario 2 comprises an existing area of green space, specifically Former Bisley FC (Lion Works Sports Ground). However, the part of the site located closest to the village core falls within the TBHSPA 400m buffer, and so would need to be retained as green space, hence there could feasibly be the potential to secure enhanced green space to the benefit of the village, noting proximity to the village hall and local centre.
- 6.3.46 A final consideration, in respect of Scenario 2, is that there would be the potential to deliver new family homes with access to private gardens, which is an important consideration from a communities and health perspective, albeit also a matter that is potentially better suited to discussion under the Housing heading.
- 6.3.47 Finally, with regards to **Scenario 3**, Fair Oaks performs well, for three headline reasons. Firstly, the site is remote from existing settlements, hence there are limited concern around impacts to existing communities, e.g. from construction or due to pressure on community infrastructure (in contrast to Scenario 2, which could see relatively piecemeal expansion of villages), albeit there would still be concerns regarding traffic impacts on existing communities. Secondly, as a strategic scale scheme there is an opportunity to deliver new community infrastructure alongside housing (as discussed) and the characteristics of the site may suggest a particular place-making opportunity, noting the river valley location and the potential to integrate with a parkland. Thirdly, the proposed approach of Countryside acting as Master Developer is of note.²⁵
- 6.3.48 The current proposal is for 35 dph within the built part of the site, which is quite high in the Surrey Heath context, but serves to highlight what can be achieved at strategic-scale schemes. The site promoters highlight that there is national support for garden villages as small as 1,500 homes, and propose a new community “*small enough for any place within it to be in easy walking distance of any other, but large enough to support a wide range of activities and facilities [to] give it life and prosperity.*”

²⁵ A Master Developer takes responsibility for obtaining planning and delivering infrastructure before marketing fully serviced land parcels to housebuilders. The Fair Oaks site promoters explain: “*Successful Master Developers adhere to a vision and set of design principles for the duration of a project. Whilst these evolve over time, it is this long-term commitment and visibility that sets Master Developers apart... As Master Developer, Countryside is responsible for securing planning consent and deliver strategic infrastructure, landscaping, new homes, and community and mixed-use facilities in a coherent manner. At Fair Oaks Garden Village this will be key to achieving desirable delivery rates, placemaking, quality and legacy.*”

6.3.49 The site promoters also notably commit to “a dedicated website, interactive ‘Smartphone App’, and... interactive information points... to inform people about: Community events, entertainment and sporting activities and religious venues; Important community meetings; Local health centres, schools, and further education opportunities; Job opportunities; Local markets and lists of local traders and restaurants; and Transport pick up points and details about dial-a-ride / demand responsive transport services.”

6.3.50 However, there is a need to question whether the issues and constraints affecting the site could limit the potential to deliver the required number of homes alongside generous green infrastructure permeating through the settlement area. Whilst there would certainly be good access to a large and high quality SANG, there is also a need to consider access to gardens and doorstep greenspace and, furthermore, green infrastructure will need to act to separate the scheme into distinct neighbourhoods. Two of the three good practice case-studies presented within the Vision Document emphasise the importance of having achieved individual integrated neighbourhoods, yet how this would be achieved at Fair Oaks GV is not a focus of the Vision Document. Through correspondence the site promoters further explained:

“Within the development blocks and streets (the ‘core’ of the scheme), approximately 10 hectares of Green corridors and Pocket park spaces are proposed. If other important ‘day to day’ elements that allow for circular walks and informal recreation along the southern and eastern boundaries of the ‘built part’ are included (i.e. a semi-natural landscape typology in a corridor of say 25-50m width) this would add a further c.10 hectares. The formal sports provision to the south-east corner also adds a further 5 hectares, equating to a total area of green infrastructure within the ‘built part’ of the site of 25 hectares, out of a total of 90 hectares proposed across the whole red line boundary...

... a series of linked green spaces will be provided and inter-woven through the built form. This will include children’s equipped play areas and accessible natural green space. These areas will ensure outdoor spaces become hubs for community integration and engagement... The character of the Green corridors will be formal in style with feature trees and linear planting with development set back either side. As you travel through the development the character of these corridors will change to mark distinct neighbourhoods, with subtle variations... to ensure the creation of ‘one community’... Contained within the green corridors will be new footway and cycle way links with safe and logical desire lines into the country park, wider landscape, and development parcels. It will be essential to provide interest and variation along these routes with opportunities for specimen trees varied amenity planting and play.”

6.3.51 In **conclusion**, there is potentially a significant place-making opportunity associated with supporting a new garden village at Fair Oaks (Scenario 3), although there are a range of uncertainties ahead of detailed work on masterplanning, viability etc. Conversely, the majority of the shortlisted Green Belt sites under Scenario 2 are small sites that would deliver little benefit to the existing community, and potentially lead to notable negative impacts, e.g. pressure on existing community infrastructure, traffic through residential areas. Under Scenario 1 there are a range of detailed considerations, but an overriding consideration is that the regeneration of Camberley town centre represents a significant place-making opportunity, including the creation of two new residential ‘quarters’ with the re-provision of new, upgraded and more accessible community facilities.

Economy and employment

Growth scenario 1 Constant supply components	Growth scenario 2 Constant supply components + smaller GB sites	Growth scenario 3 Constant supply components + Fair Oaks GV
★ 1	2	★ 1

6.3.52 Under **Scenario 1** there is limited focus on delivering new employment land, which is appropriate given the discussion of objectively assessed needs set out in Section 5.3, but there is a carefully considered strategy for Camberley town centre, which should be supportive of its role as sub-regionally important hub of economic activity. There is also a need to consider sites identified as deliverable/developable for residential use within the SLAA that are currently in use for employment, albeit there is a need to be mindful of permitted development rights that can allow for a change of use from employment to residential via the prior approval process, i.e. without going through the planning application process.

- 6.3.53 A key site for consideration is Sir William Siemens Square Site, Chobham Road, Frimley (Site 907), noting that whilst the site is currently unallocated in the adopted Core Strategy, the Issues and Options consultation document (2018) proposed allocation of a Strategic Employment Site. The Employment Land Technical Paper (2019) strongly supported continued use for employment, describing it as a “*high quality, high profile site.*” However, the latest situation is that the site is currently vacant.
- 6.3.54 With regards to **Scenario 2**, it is thought unlikely that any of the sites in question would deliver new employment land, and a further consideration is the risk of problematic traffic congestion impacting on businesses, although there is no reason to suggest any significant concern in this respect. One possible benefit is increased larger / family housing with space standards suited to supporting homeworking.
- 6.3.55 Finally, with regards to **Scenario 3**, the scheme would deliver new employment land to expand an existing employment location. However, the strategic importance of employment growth at this location is not entirely clear at the current time, given the rural location and the lack of identified need at the borough-scale. Also, some existing manufacturing and aeronautical businesses on-site would not be compatible with nearby homes. The site promoters suggest: “*Only 6 of the existing 59 businesses require the use of the airport or runway... The existing employment buildings will be renovated and redeveloped to suit modern ways of working and meet the future needs of both existing and new occupiers.*” However, through the previous planning application process there was considerable discussion around the economic importance of the current airport use.
- 6.3.56 In **conclusion**, the strategy under Scenario 1 is thought to align with objectively assessed needs and sub-regional strategy established by the Local Enterprise Partnership (LEP), hence it is fair to predict positive effects, albeit modest given limited support for new employment land, and some notable allocations that would see change of use from employment to residential. With regards to Scenario 3, whilst the scheme would deliver new employment land to expand an existing employment area, an overriding consideration is the lack of an objectively assessed need for new employment land in the Borough.

Historic environment

Growth scenario 1 Constant supply components	Growth scenario 2 Constant supply components + smaller GB sites	Growth scenario 3 Constant supply components + Fair Oaks GV
★ 1	3	2


- 6.3.57 With regards to **Scenario 1**, Camberley town centre is notable for being associated with limited historic environment constraint; however, there are a range of other issues and sensitivities associated with the package of allocations and other SLAA sites, including: two sites (one for 65 homes and the other for 21 homes) adjacent to the Basingstoke Canal, which is a designated conservation area; support for a 15 home scheme adjacent to southern extent of Chobham Conservation Area, where there are several listed buildings; and support for further expansion to the east of West End, where there is a historic farm associated with two listed buildings. There are also several sites associated with locally listed buildings, including the proposed allocation at the northern extent of Bagshot.
- 6.3.58 With regards to **Scenario 2**, some of the shortlisted sites could extend modern housing estates into countryside with limited sensitivity (e.g. at Windlesham); however, there are concerns with respect to:
 - West End and Bisley – whilst West End is not a historic settlement, this broad area is likely to be associated with historic character, reflecting better quality soils, which presumably will have supported farming and settlement more so than broad areas associated with heathland / common land. Linked to this, it is also evident that this area benefits from a high density of public rights of way.

In particular, two shortlisted sites to the east of Bisley are in proximity to a notable cluster of listed buildings, including the grade 2* parish church, which is associated with a rural setting and a network of bridleways shown as lanes on historic maps.

There is also a need to consider the heritage value of the river/stream corridor between West End and Bisley, with the possibility of growth encroaching somewhat on the two notable clusters of grade 2 listed buildings - namely the Lucas Green cluster and the Beldam Bridge Farm cluster - although all of the shortlisted sites in question are more than c.100-200m from a listed building.

- The southern part of Chobham, in proximity to the conservation area - which is associated with a very high density of listed buildings. In particular, a scheme along Castle Grove Road could impact the rural approach to the conservation area from the south, although there would be good potential to make use of a mature roadside hedgerow / tree belt to screen the development. The scheme would involve developing the grounds of Broadford (N.B. under Scenarios 1 and 2 a 15 home scheme is assumed, which could be achieved without Green Belt release, but under Scenario 3 a larger scheme is assumed), which is shown on historic OS maps (pre-1914), although not locally listed.
- 6.3.59 Also, one of the shortlisted sites at Windlesham (Snows Ride) may be associated with a degree of sensitivity, in that it comprises a large field that is shown on historic OS maps as comprising part of the landscaped grounds associated with Windlesham Court (which remains, but is not locally listed).
- 6.3.60 With regards to **Scenario 3**, the Fair Oaks Vision Document presents fairly detailed analysis, and it seems clear that whilst the site is not without its constraints, there would be good potential to avoid and mitigate impacts through masterplanning, landscaping and design. Key considerations likely relate to the concentration of heritage assets associated with the historic airfield use, the river valley and Ottershaw Park. A primary concern is potentially around encroachment of the proposed settlement area on the north-western sector of the parkland, as per the discussion above under Biodiversity. The Vision Document states: *“Delivery of the substantial SANG also provides an opportunity to enhance the historic landscape of the nearby Grade II Listed Ottershaw Mansion.”* However, there is a need to scrutinise this suggestion, mindful that there will be negative impacts to the western extent of the landscape. The site promoters explain: *“... key remnant landscape features associated Ottershaw Park are retained and incorporated into the proposals, in particular the woodland and Little Blackmole Pond on the eastern boundary, Samson’s Wood and Long Copse, the parkland trees, and the remaining field divisions within the eastern part of the Site.”* A final consideration is offsite impacts due to traffic and required road infrastructure upgrades, and in this respect significant concerns were raised through the previous planning application, particularly required junction upgrades in the Chobham Conservation Area.
- 6.3.61 In **conclusion**, there is certainly a concern with Scenario 2 over-and-above Scenarios 1 and 3. It is appropriate to flag a risk of significant negative effects under Scenario 2, although in practice there would likely be good potential to reduce concerns through further site selection, masterplanning and design. With regards to Scenarios 1 and 3, it is fair to highlight a concern with Scenario 3 over-and-above Scenario 1. However, significance is uncertain, ahead of receiving the views of Historic England.

Housing

Growth scenario 1 Constant supply components	Growth scenario 2 Constant supply components + smaller GB sites	Growth scenario 3 Constant supply components + Fair Oaks GV
3	2	

- 6.3.62 The primary point to make here is that all three Scenarios would enable the housing requirement to be set at 299 dpa, or 5,680 homes in total, which is the figure arrived at by subtracting the agreed unmet need provision in Hart (41 dpa over the first 13 years of the plan period, or 533 homes in total) from the Borough’s standard methodology derived LHN figure, which is 327 dpa, or 6,213 homes in total. On this basis significant positive effects are predicted for all three scenarios.
- 6.3.63 Under **Scenario 1** there would be a supply buffer over-and-above the housing requirement of approximately 7%, whilst the supply buffer would be approximately 21% under **Scenario 2** and 25% under **Scenario 3**. A larger buffer can be appropriate where the supply includes heavy reliance on challenging sites associated with delivery risk. However, it is nonetheless the case that, under Scenarios 2 and 3, there could be the potential to explore a reduced supply buffer and, in turn, a higher housing requirement (in effect, a commitment to delivering more homes than under Scenario 1). This would represent a proactive approach to addressing affordable housing needs, which have been introduced in Section 5.2, and are further discussed in **Box 6.1**.
- 6.3.64 When seeking to differentiate between Scenarios 2 and 3, considerations include:

- **Scenario 2** - there is currently uncertainty regarding the precise number of homes that would be needed and could realistically/sustainably be delivered at smaller Green Belt sites. However, generally speaking, small Green Belt allocations can perform well from a 'housing' perspective, because such sites: tend to be associated with low delivery risk and, in turn, tend to be able to deliver relatively early in the plan period (albeit few of the shortlisted sites simply comprise unconstrained agricultural land); would be suited to delivering family housing (also larger homes suited to supporting home working); and could help to meet very localised housing needs at the Borough's villages (although there is no evidence to enable any such needs to be quantified in any detail).
- **Scenario 3** - the current Fairoaks Vision Document goes into detail on the anticipated delivery timeline and, as per the finding of the Runnymede Local Plan Inspector in respect of Longcross GV (paragraph 122 of the Inspector's Report, 2020), it is fair to say that *"there are several positive factors that support this trajectory in principle"*, including *"the substantial experience of the developer in delivering large-scale projects and the attractiveness of the vision for the Garden Village"*. Also, the proposed approach of Countryside acting as Master Developer (discussed above under Communities) is supported from a delivery perspective. Also, the proposed concept masterplan includes land for Gypsy and Traveller pitches, which is an important consideration in the Surrey Heath context, given limited alternative options for meeting Gypsy, Traveller and Travelling Showpeople accommodation needs in the Borough. However, the Vision Document does not discuss the possibility of delivering any specialist accommodation (in comparison, policy for Longcross GV provides for specialist accommodation).

6.3.65 In **conclusion**, significant positive effects are predicted for all three scenarios. However, there is clear support for Scenarios 2 and 3 over-and-above Scenario 1, from a 'housing' perspective, and Scenario 3 performs most positively given: the significant local affordable housing need combined with uncertainties regarding the precise number of homes under Scenario 2; and potential for Gypsy and Traveller pitches.



Box 6.1: Affordable housing needs

As discussed in Section 5.2, affordable housing needs are explored through the Housing Needs Assessment (2020), which concludes that affordable housing needs are *"relatively high compared to overall [housing] need; this justifies the Council seeking to secure as much additional affordable housing as viably possible."*

The potential to secure affordable housing will be a focus of a whole plan viability study prior to the Local Plan being finalised for publication under Regulation 19. However, at the current time, it is important to highlight that recent experience in the Borough does serve to indicate certain challenges, with the most recent [Authority Monitoring Report](#) (2021) identifying that only 15% of homes completed since the start of the Core Strategy plan period have been affordable. Delivery in the 2019/20 monitoring year was strong, at 35.1%; however, in the 2020/21 monitoring year only 11.1% of homes delivered were affordable.

Looking beyond the top level statistics, recent experience has seen a need to agree a level of affordable housing below the policy ambition at several large sites due to viability challenges, notably: Sturt Road (ref. [20/1048/FFU](#)), which is set to provide up to 9.4% (discounted market housing), and this figure remains subject to adjustment pending further investigations on the cost of drainage solutions (and the scheme is not able to make an education contribution); and Princess Royal Barracks (a key strategic site, but subject to constraints given former MOD uses), which will deliver 20% overall, with the outstanding Reserved Matters applications to deliver 15%. Also, and importantly, it is important to note that in the 2020/21 monitoring year a significant quantity of applications came through as prior notifications for the conversion of offices to residential accommodation. Such applications do not have the requirement for developers to provide affordable housing.


Land, soils and resources

Growth scenario 1 Constant supply components	Growth scenario 2 Constant supply components + smaller GB sites	Growth scenario 3 Constant supply components + Fairoaks GV
	2	

6.3.66 Beginning with **Scenario 1**, the proposed strategy is largely focused on previously developed land, and hence performs well. Several sites are greenfield comprising woodland or forestry, as discussed above, but none are thought to comprise productive agricultural land. Others comprise the private grounds/curtilage/gardens of existing homes/buildings in large plots.

- 6.3.67 With regards to **Scenario 2**, the shortlisted sites are all primarily greenfield sites, although only a small proportion of the sites comprise agricultural fields (others comprise woodland/forestry or private grounds/curtilage/gardens). One of the sites has been surveyed in detail to ascertain agricultural land quality (see the 'post 1988 classification' dataset available at www.magic.gov.uk), namely land to the east of West End (Site 813), where survey work indicates the presence of grade 2 quality land (classed as best and most versatile, BMV), although the site is currently used for forestry.
- 6.3.68 Whilst none of the other shortlisted sites have been surveyed in detail, it is noted that the nationally available 'provisional' agricultural land quality dataset (which is very low resolution) does show an area of better quality agricultural land in the West End / Bisley area, where there is a concentration of shortlisted sites (in addition to Site 813). Specifically, the provisional dataset shows an area of 'grade 3' agricultural land here, which in practice could be grade 3a (BMV) or grade 3b (not BMV) or, indeed, it could be a different grade entirely in practice (as is the case for Site 813). The rest of the Borough is shown by the provisional dataset to mostly comprise lower quality land (grade 4 or 5), as reflected in the extent of heathland commons / former commons and forestry.
- 6.3.69 Finally, with regards to **Scenario 3**, the current Fairoaks Vision Document states that the part of the site (42% of the total area) that comprises open fields has been surveyed in detail and found to comprise grade 3b quality land, i.e. land that does not qualify as BMV (although survey findings are not currently shown at magic.gov.uk). This is potentially somewhat surprising, as land to the south (McLaren Park, within Woking Borough) has been surveyed in detail and found to comprise grade 1 quality land. Regardless, a benefit of the Fairoaks GV scheme would be that some use would be made of previously developed land, with the site promoters suggesting that all of the land currently associated with the operational uses of the airport, including extensive areas of grassland either side of the runway, can be classified as previously developed. The NPPF definition is [here](#), and the site promoters suggest:
- "... the managed mown grassland surrounding the runways supports the functioning and operational activities of the airfield and runway and therefore prohibits agricultural use. It is classified as previously developed land alongside the buildings, airstrip, tarmac. This is established in the case of Dunsfold Aerodrome... where the Inspector confirmed that 83% of the Dunsfold was previously developed."*
- 6.3.70 In **conclusion**, Scenarios 1 and 3 perform notably well from a perspective of making good use of previously developed land and avoiding loss of BMV agricultural land. In comparison, Scenario 2 would certainly lead to the loss of productive agricultural land, and potentially some that is of BMV quality.

Landscape

Growth scenario 1 Constant supply components	Growth scenario 2 Constant supply components + smaller GB sites	Growth scenario 3 Constant supply components + Fairoaks GV
	3	2

- 6.3.71 Beginning with **Scenario 1**, a range of relevant considerations have already been explored. The Borough benefits from extensive woodland and forestry, which serves to screen and contain growth locations in the landscape and leads to relatively limited concerns regarding piecemeal expansion or 'sprawl' over time. For example, and notably, further expansion to the east of West End would be well contained by woodland (and the boundary of the Green Belt). The SLAA identifies three small sites in the Green Belt that are less well contained in landscape terms, but the Green Belt designation should serve to ensure that development does not impact on openness, and also negate any risk prevent problematic long term development creep. Also, a small SLAA site at Mytchett appears to be associated with an open river valley landscape, but it is not clear that there are any sensitive public view points into or across the site, and the scheme would be contained by the flood zone.
- 6.3.72 With regards to **Scenario 2**, the primary point to note is that most, if not all, of the shortlisted sites are likely to fall within parcels that contribute to at least one of the nationally defined Green Belt purposes, and some of the sites are likely to perform strongly in Green Belt terms. It has not been possible to take into account the findings of the most recent Green Belt Review (see Figure 5.3) through this appraisal.

- 6.3.73 Maintaining a focus on Green Belt function, it is clear that some of the sites benefit from a degree of containment within the landscape. However, ahead of any decision to allocate there would be a need for further work to explore the potential to define a new long term defensible Green Belt boundary (any such work would need to be preceded by evidence that exceptional circumstances are likely to exist).
- 6.3.74 Considering landscape more broadly, concerns discussed above are of relevance here, including around sites that would encroach on the river valley landscape between West End and Bisley, and sites that relate relatively poorly to existing settlements in built form terms (notably sites at Bisley and Chobham).
- 6.3.75 With regards to Windlesham, one consideration is potentially the risk of problematic urban sprawl along the A30, noting the recently permitted garden centre redevelopment scheme between Snows Ride and Broomhall. However, the site in question, to the east of Snows Ride (Site 112), appears to be well-screened from the road by a tree belt, and there are no public rights of way in the vicinity (indeed, there is only one public right of way linking to Snows Ride, potentially suggestive of a growth-related opportunity).
- 6.3.76 With regards to the main Windlesham village core, further expansion to the east, into Heathpark Wood, potentially gives rise to a degree of concern, although there would presumably be good potential to utilise woodland to screen housing from the B386, and therefore maintain a sense of woodland separation between the eastern edge of Windlesham and built form further to the east, along the B386. Land to the west of Windlesham is sensitive in historic environment terms, and potentially also landscape terms (e.g. noting a high density of public rights of way), and land here has been promoted as available in the past, but there are currently no sites known to be available.
- 6.3.77 Finally, with regards to **Scenario 3**, the first point to note is that there is a need for further work to understand the contribution that the site currently makes to Green Belt purposes. However, leaving aside Green Belt, there are reasons to suggest that supporting growth here could well be preferable to the option of supporting a similar quantum of growth at village edge locations, from a landscape perspective.
- 6.3.78 The landscape merit of the site relates to the fact that it is currently an operational airfield and, whilst most airfields tend to be located on raised plateaus (e.g. Wisley), Fair Oaks is located within a river valley landscape. This should help in terms of minimising views into and across the site, and also suggests good potential for containment in the long-term, i.e. low risk of problematic 'sprawl'. Looking more closely at the site, it does appear to be very well contained in the river valley landscape, with good potential for containment: to the west by the flood risk zone; to the north by the A319, rising land and biodiversity constraint; to the east by SANG; and to the south by SANG / flood risk zone / SPA constraint.
- 6.3.79 Views across the site from the A319 and from two public rights of way that link Chobham Common to the north with Horsell Common to the south (and hence are likely to be of some strategic importance) are a further consideration, but likely to be of limited significance.
- 6.3.80 The other key consideration is the potential to greatly improve accessibility to the River Bourne valley (there is currently no footpath following the river here, unlike to the west, between the site and Chobham, hence the possibility of a coordinated landscape scale enhancement programme might be envisaged) and the remnant parkland landscapes of Ottershaw Park, where there are currently no public rights of way.
- 6.3.81 Returning to Green Belt, the site promoters emphasise that *"the NPPF, case law and Inspector's Reports... demonstrate Green Belt sites are not to be considered as a 'last resort' if they achieve sustainable development."* However, equally, paragraph 141 of the NPPF is clear that: *"Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options..."*
- 6.3.82 In **conclusion**, it is certainly fair to highlight a significant concern with Scenarios 2 and 3 over-and-above Scenario 1, noting the Green Belt constraint (Green Belt is not a landscape designation, but is valued for its openness) and wider concerns around impacts to landscapes that are likely to be associated with a degree of sensitivity (more so Scenario 2). It is a challenge to differentiate between Scenarios 2 and 3, particularly given uncertainty regarding the precise sites for allocation under Scenario 2. However, assuming a 'worst case Scenario 2', it is suggested that Scenario 3 (Fair Oaks GV) may be preferable.

Transport

Growth scenario 1 Constant supply components	Growth scenario 2 Constant supply components + smaller GB sites	Growth scenario 3 Constant supply components + Fairoaks GV
	2	2

- 6.3.83 Beginning with **Scenario 1**, there is much to commend the proposed approach to distribution from a transport perspective, as discussed above. Whilst provision for (modest) unmet needs in Hart District could lead to car trips over-and-above a scenario whereby needs are met locally, concerns are allayed on account of Surrey Heath and Hart being understood to share a housing market area.
- 6.3.84 With regards to **Scenario 2**, there are significant concerns from a transport perspective, for the reasons set out above. There can be transport arguments in support of growth at villages, for example where the effect is to support local community infrastructure, transport infrastructure (e.g. new walking or cycling paths) or bus services, but no particular opportunities have been highlighted to date.
- 6.3.85 The two northern-most shortlisted sites stand-out as being associated with the greatest merit in transport terms, with the site at Bagshot (Site 736) located adjacent to two a-roads and within 400m of Bagshot railway station, and the site at Snows Ride (Site 809) located adjacent to the A30, thereby reducing concerns regarding traffic generation and enabling good access to bus services (including to Bagshot station to the west and Sunningdale station to the east, both of which are within 2.5km; there is also a footpath along the A30, but not cycle path).
- 6.3.86 Finally, with regards to **Scenario 3**, a key consideration is thought likely to be the A320 corridor between Woking and M25 Junction 11, which is a focus of the adopted Runnymede Local Plan and the Local Plan Inspector's Report. There are plans for significant enhancements to the road corridor; however, there is a need to establish whether these will lead to any spare capacity over-and-above that needed to accommodate committed growth within the Runnymede Local Plan and elsewhere. There will certainly be a need for detailed investigations, potentially of a similar nature to that undertaken for the Runnymede Local Plan prior to support for Longcross GV (and other allocations along the A320) being confirmed. The Inspector's report refers to the importance of "*a robust, comprehensive and transparent evidence base for the Plan*", and the following statements made within the Inspector's Report are also of note:
- "The Plan's implications for traffic growth and highway safety on the A320 and on the M25 have been thoroughly assessed, together with the necessary mitigation measures, so far as... is reasonable..."*
- "A revised trajectory for housing delivery at LGV was considered at the hearing in... taking account of the updated evidence on the improvements required on the A320 corridor and at junction 11 of the M25."*
- 6.3.87 Other key matters for scrutiny are impacts to the A319 corridor, the proposed A319/A320 link road through the site, potential for trip-internalisation, public transport connectivity and offsite walking/cycling links.
- 6.3.88 In respect of public transport, there is a need to recall NPPF paragraph 138, which requires a focus on this matter when considering Green Belt release. There could well be an opportunity to enhance bus connectivity locally, with the suggesting that "*the ability to integrate services with Chobham, St Peter's Hospital and Woking should aid delivery.*" The promoters also suggest that "*using a methodology that has been agreed with Surrey Council... officers elsewhere, it has been shown that it would be financially viable to divert Route 446 through the site whilst at the same time increasing its frequency to at least 20 minutes.*"
- 6.3.89 With regards to walking/cycling links, this is a major focus of the Fairoaks Vision Document, and it is fair to assume that support for a strategic growth location will lead to opportunities to support walking/cycling (also micro-mobility, 'mobility as a service' etc). Materials submitted to date do include fairly detailed commitments in respect of onsite mobility aspirations, explaining: "*In short, these are perhaps best described by the emerging theory of the Sustainable Accessibility and Mobility (SAM) framework... Although important to note the SAM model is a decision-making hierarchy for transport planning and land use, physical infrastructure also includes: Co-working space as part of the local centre; Car and cycle share options; A focal point for public transit options; Infrastructure that encourages and facilitates the use of alternative fuel technology (i.e. EV charging points); Dedicated website; Interactive 'Smartphone App'; and Conveniently located interactive information points.*"

- 6.3.90 Proximity to Woking is a clear benefit, and the site promoters explain: *“The existing services and amenities of the town would be well connected to Fairoaks, which in spatial terms could be termed as a satellite settlement to Woking... The town is a key service centre with a station offering mainline railway services, leisure, community, employment uses and [is] the second largest shopping centre in Surrey after Guildford.”* However, there is a concern regarding the potential to achieve good walking/cycling links between the site and Woking. The site promoters highlight that a National Cycle Route follows the A320, and that this is set to be [upgraded](#); however, it is not clear that this is a direct route from the settlement area unless a link is created through the northeast corner of Horsell Common, and there is potentially an alternative, more direct route via the Common.
- 6.3.91 With regards to EV charging infrastructure, the site promoters commit to: *“ensuring an EV charging point is available for each home and an installation of community EV charging points in key locations.”* N.B. EV charging points are set to become a requirement of all new homes nationally]
- 6.3.92 In **conclusion**, Scenarios 2 and 3 lead to concerns over-and-above Scenario 1, although it is important to note that Scenario 1 is associated with uncertainties ahead of traffic/transport modelling. With regards to Scenarios 2 and 3, it is not possible to differentiate between the scenarios with any confidence, given that Scenario 2 is defined in somewhat high level terms, and given the need for further detailed work to confirm the transport infrastructure upgrades that are necessary and affordable under Scenario 3.

Water

Growth scenario 1 Constant supply components	Growth scenario 2 Constant supply components + smaller GB sites	Growth scenario 3 Constant supply components + Fairoaks GV
★ 1	2	★ 1

- 6.3.93 Perhaps a primary consideration is in respect of capacity at wastewater treatment works (WwTWs). There is often good potential to deliver capacity increases in support of growth; however, this can be costly and lead to delays, and there can be residual risk of capacity being breached leading to pollution of waterways. As such, it is preferable to direct growth to locations with existing capacity. Matters were explored through a Water Cycle Study (WCS) for Hart, Rushmoor and Surrey Heath councils in 2017. The study explores housing growth under various scenarios that do not necessarily relate to the scenarios currently under consideration; however, the study does highlight Chobham WwTW as having greater capacity to accept additional flows than is the case for the other two WwTWs in the Borough (Camberley and Lightwater).
- 6.3.94 In this light, a focus of growth at Bagshot, Windlesham, West End and Bisley under **Scenario 2** could potentially give rise to a degree of concern over-and-above Scenario 1, in that none of these settlements benefit from a local WwTW (leading to a need to pipe/pump wastewater, which can give rise to issues and costs) and given limited capacity at Lightwater WwTW. Whilst there is no certainty at the current time ahead of further detailed investigations, the potential for wastewater to be a significant constraint can be envisaged, particularly under a scenario whereby Green Belt sites at the settlements listed above are favoured ahead of sites at Chobham. As for **Scenario 3**, it seems likely that wastewater would flow, or be pumped, to Chobham WwTW, but this has yet to be confirmed (views of the water company are sought).
- 6.3.95 Aside from WwTW capacity, other issues relate to pollution to surface and ground water and supporting water efficiency / minimising pressure on potable water resources. However, there is limited potential to differentiate the scenarios in respect of these issues. The Fairoaks site promoters explain *“a corporate commitment to achieve water efficiency in homes of at least 105 litres per person per day or lower...”* However, some water companies now target 100 l/p/d (see [southernwater.co.uk/water-for-life/target-100](https://www.southernwater.co.uk/water-for-life/target-100)).
- 6.3.96 In **conclusion**, it is fair to highlight a degree of risk under all scenarios ahead of formal consultation with the statutory providers, and a degree of relative concern is highlighted with respect to Scenario 2.

Summary and conclusions

6.3.97 The matrix below presents a summary of the appraisal presented above. Within each row, the aim is to both categorise the performance of each of the growth scenarios in terms of significant effects (using **red** / **amber** / **light green** / **green**) and rank the scenarios in order of preference (where 1 is best performing).

Table 6.1: Summary appraisal of the reasonable growth scenarios

SA topic	Growth scenario 1 Constants only	Growth scenario 2 Constants + Small GB sites	Growth scenario 3 Constants + Fairoaks
	Rank of preference and categorisation of effects		
Accessibility	★1	3	2
Air quality	★1	2	2
Biodiversity	★1	2	2
CC adaptation	★1	2	★1
CC mitigation	★1	3	2
Communities	2	3	★1
Economy and employment	★1	3	★1
Historic environment	★1	3	2
Housing	3	2	★1
Land, soils, resources	★1	2	★1
Landscape	★1	3	2
Transport	★1	2	2
Water	★1	2	★1

Discussion

The appraisal highlights **Scenario 1** as performing best in terms of the greatest number of topics and as being associated with the fewest predicted negative effects. However, it does not necessarily follow that Scenario 1 is best performing or ‘most sustainable’ overall, because the appraisal is undertaken without any assumptions made regarding the weight, or degree of importance in the decision-making process, that should be assigned to each of the topics, nor is it safe to assume that each is of equal importance. There are a range of issues and impacts associated with Scenario 1 – both in respect of topics where the appraisal matrix flags an ‘amber’ and in respect of other topics, where the overall conclusion is neutral or positive - which are explored further in Section 9.

With regards to **Scenario 2**, the appraisal finds this scenario to perform relatively poorly in terms of all sustainability topics, which is a strong indication of poor performance overall. However, it is important to note that this scenario is defined in somewhat high level terms. In practice, in the event that exceptional circumstances were identified to warrant Green Belt release, it could transpire that fewer than 800 homes are required to be delivered at smaller Green Belt sites, and further detailed work might serve to identify sites that perform relatively well in terms of certain sustainability topics. For example, one or two of the potential sites have a degree of merit in transport terms. However, under any scenario it would likely remain the case that all of the sites in contention for allocation are of a modest scale such that they would be unlikely to deliver significant ‘planning gain’ over-and-above new homes (to include family homes with gardens). It also seems likely that, under any scenario, there would be pressure to allocate in flood zone 2 and in close proximity to the TBHSPA 400m buffer.

Finally, with regards to **Scenario 3**, the appraisal highlights a mixed picture, with this scenario preferable to Scenario 1 from a ‘housing’ and a ‘communities’ perspective, given affordable housing needs and a clear place-making opportunity (also, there are arguments in favour of Scenario 3 from an ‘economy and employment perspective), but giving rise to concerns over-and-above Scenario 1 in several other respects, namely:

- Accessibility – the new community would not deliver higher order facilities, e.g. a secondary school;
- Air quality – there are some local sensitivities and wider concerns that would need to be explored;
- Biodiversity – a key issue given the sensitive location of the site between two components of the TBHSPA;
- Climate change mitigation – there are questions around both transport and built environment emissions;
- Historic environment – onsite and adjacent sensitivities, plus a concern regarding road upgrades at Chobham;
- Landscape - albeit concerns potentially relate to Green Belt more so than landscape more widely; and
- Transport – impacts to the strategic road network, including the A320 and motorway junctions, would need to be carefully considered; the site benefits from proximity to Woking, but links are potentially problematic; materials submitted to date do include fairly detailed commitments in respect of onsite mobility aspirations.

Strategic growth locations can give rise to considerable opportunities to realise sustainability objectives, over-and-above piecemeal expansion of settlements. However, the proposed garden village is relatively small in scale, and there are a range of locational issues and constraints. There might feasibly be potential to address the locational challenges, but there would be costs and trade-offs involved, which would need to be fully explored. The figure below shows the latest available illustrative masterplan submitted by the site promoters.

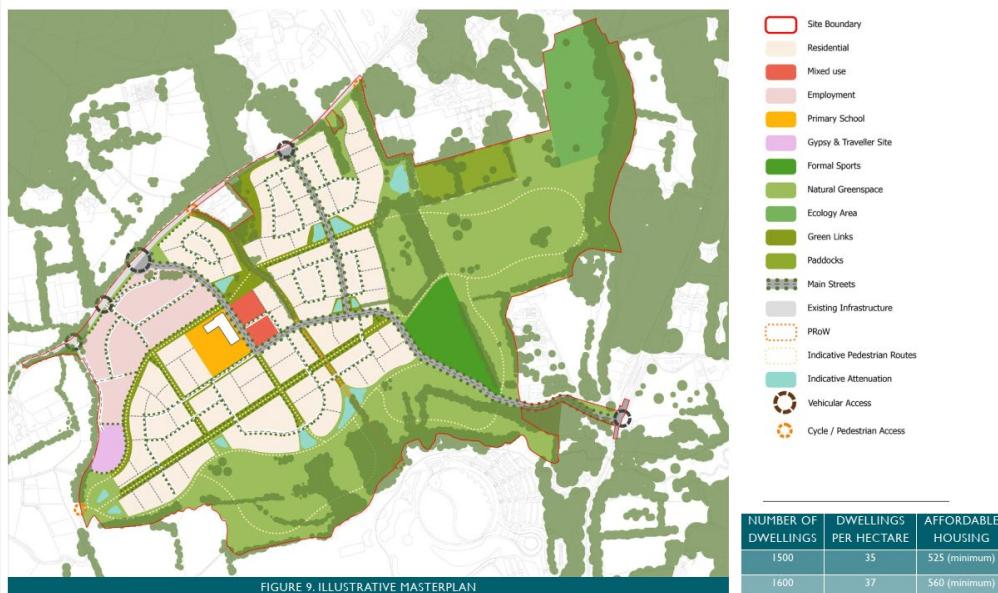


FIGURE 9. ILLUSTRATIVE MASTERPLAN

7 The preferred growth scenario

Introduction

- 7.1.1 As discussed, it is not the role of the appraisal to arrive at a conclusion on which of the growth scenarios is best, or 'most sustainable' overall. Rather, it is the role of the plan-making authority to arrive at that conclusion, informed by the appraisal. This section presents the response of SHBC to the appraisal.

Officers reasons for selecting the preferred scenario

- 7.1.2 The following statement explains SHBC Officers' reasons for supporting **Growth Scenario 1**, in-light of the appraisal. To reiterate, this statement is a response to the appraisal; it is not an appraisal:

The appraisal shows Scenario 1 to perform well in a number of respects, ranking highest or equal highest for the majority of SA topics, specifically:

- Accessibility
- Air Quality
- Biodiversity
- Climate change adaptation and mitigation
- Economy and employment
- Historic environment
- Land, soils, resources
- Landscape
- Transport
- Water

Whilst Scenario 3 does rank higher than Scenario 1 in terms of two of the SA topics (Communities and Housing), it performs poorly, relative to Scenario 1, in several respects, most notably Biodiversity, Landscape and Transport. Scenario 2 ranks below Scenario 1 under all topics other than Housing.

In summary, Scenario 1 is justified because it has no predicted significant negative effect for any SA topic, stands out as performing relatively well in a number of respects and is predicted to give rise to fewest negative effects. It is not possible to identify an alternative strategy that would perform better overall.

The primary issue in terms of which the alternatives perform better is Housing, however, the appraisal nonetheless predicts a 'significant positive effect' for Scenario 1 because the borough's assigned Local Housing Need (LHN) figure would be met, after having accounted for an element of supply via the adopted Hart Local Plan. It is recognised that there are issues and challenges around meeting affordable housing needs under Scenario 1, which will be explored through and subsequent to the current consultation, including through a whole plan viability study. It is also recognised that Scenario 1 is not without its issues and challenges more widely, as highlighted through the appraisal, and explored further in Section 9 of this report. The current Local Plan consultation document seeks to respond to growth-related issues and challenges through thematic and site-specific policies.

Part 2: What are the appraisal findings at this stage?

8 Introduction to Part 2

8.1.1 The aim of this part of the report is to present an appraisal the Preferred Options Local Plan as a whole. In practice, this means revisiting the appraisal of Growth Scenario 1, as presented in Section 6, but with added consideration given to proposed thematic, area-specific and site specific policies.

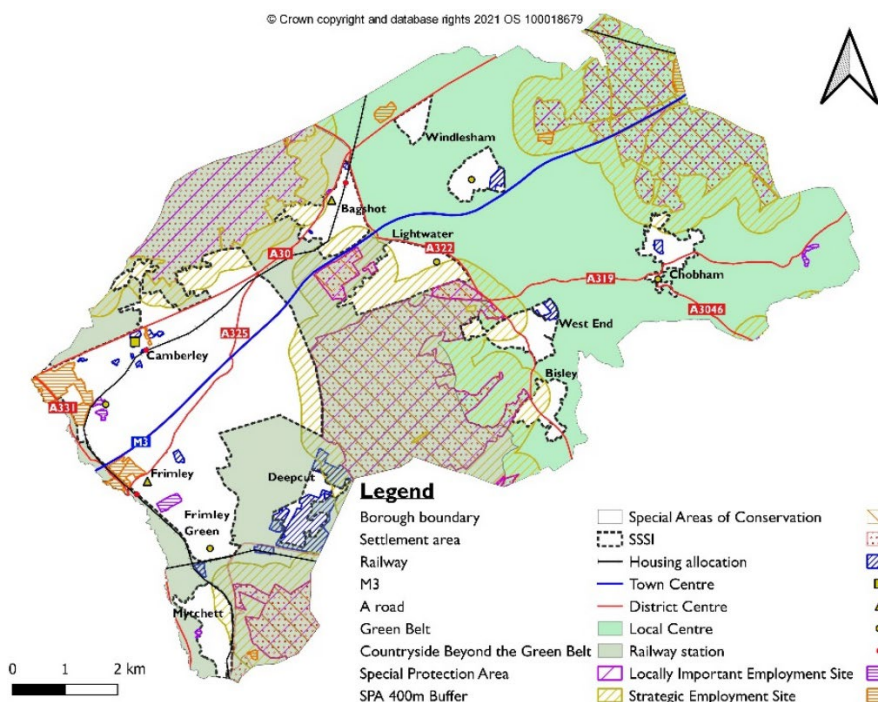
8.2 Overview of the Local Plan

8.2.1 The Draft Surrey Heath Local Plan: Preferred Options (2019 – 2038) (henceforth ‘the Local Plan’) presents policies under seven headings: Spatial strategy; Housing; Town centre, retail and economy; Infrastructure; Environment; Green Belt and countryside; and Design and heritage.

8.2.2 The appraisal focuses on proposed allocations and other sites identified as deliverable/developable by the SLAA. In other words, the appraisal focuses on the housing supply that has been identified for the purposes demonstrating that needs will be met. Proposed allocations are those deliverable/developable SLAA sites with a capacity of 25 homes or more, and are set out in Policy H1, as supplemented by Policies H2, H3 and H4. Proposed allocations are also shown on the Key Diagram, which is reproduced below. It is also important to note, at this stage, that the following allocations are entirely or largely committed, such that they do not need to be a focus of the appraisal to the same extent as non-committed sites:

- Land west of Sturt Road, Frimley Green (Site 557) - full consent for 160 homes;
- 134 and 136 London Road, Bagshot (Site 181) – outline consent for 26 homes;
- Housing Reserve Site, East of Heathpark Drive, Windlesham (Site 177) outline consent for 116 homes;
- 84-100 Park Street (Site 865) - benefits from planning permission for 61 sheltered apartments. However, the site has been identified as being suitable for a revised, residential (C3) development scheme.
- Mindenhurst, Deepcut (Site 567), which comprises the former Princess Royal Barracks, is a key strategic site in the Borough. A hybrid Planning Permission was granted in 2014 (application no. 12/0546) for 1,200 residential units and other uses including retail and community facilities, and public open space. Since that time there have been a series of S73 applications and Non-Material Amendments providing alterations to the scheme as originally submitted. The Phase 1 Reserved Matters and site wide Design Codes were approved in 2016 and development of the first residential units commenced in 2018-19. Further phases of the development including supporting infrastructure have also been approved. Proposed Local Plan Policy H4 aligns with extant planning consent.

Figure 8.1: The Key Diagram



8.3 Appraisal methodology

- 8.3.1 Appraisal findings are presented across 13 sections below, with each section dealing with a specific sustainability topic. For each of the sustainability topics in turn, the aim is to discuss the merits of the Local Plan, as a whole, before reaching an overall conclusion on significant effects. Specifically, in accordance with the SEA Regulations, the aim is to “identify, describe and evaluate” significant effects.
- 8.3.2 Conclusions on significant effects are reached on the basis of available evidence and understanding of key issues and opportunities, mindful of the guidance presented within the Schedules 1 and 2 of the SEA Regulations as well as the Government’s Planning Practice Guidance. Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the Local Plan. The ability to predict effects accurately is also limited by knowledge gaps in respect of the baseline (both now and in the future under a ‘no plan’ scenario). In light of this, there is a need to make considerable assumptions regarding how the Local Plan will be implemented ‘on the ground’ and the effect on particular receptors. Assumptions are discussed in the appraisal text where necessary.
- 8.3.3 Finally, it is important to note that the appraisal aims to strike a balance between, on the one hand, a need to be systematic and suitably comprehensive with, on the other hand, a need for conciseness and accessibility. The balance that is struck is one whereby issues are only discussed where there is the potential to meaningfully comment on the performance of the plan. Under each of the 13 topic headings the aim is *not* to systematically discuss each and every one of the Local Plan policies, nor each and every one of the issues/objectives identified at the SA scoping stage.

9 Appraisal of the Local Plan

9.1 Introduction

- 9.1.1 The aim of this section is to present an appraisal of the Local Plan under the 13 SA topics.

9.2 Accessibility (to community infrastructure)

- 9.2.1 Sustainability objectives include:
- Improve opportunities for access to education, employment, recreation, health, community services and cultural opportunities for all sections of the community
 - Sustain and enhance the viability and vitality of town, district and local centres
 - Improve the education and skills of the local population
 - Maintain and improve cultural, social and leisure provision

Discussion

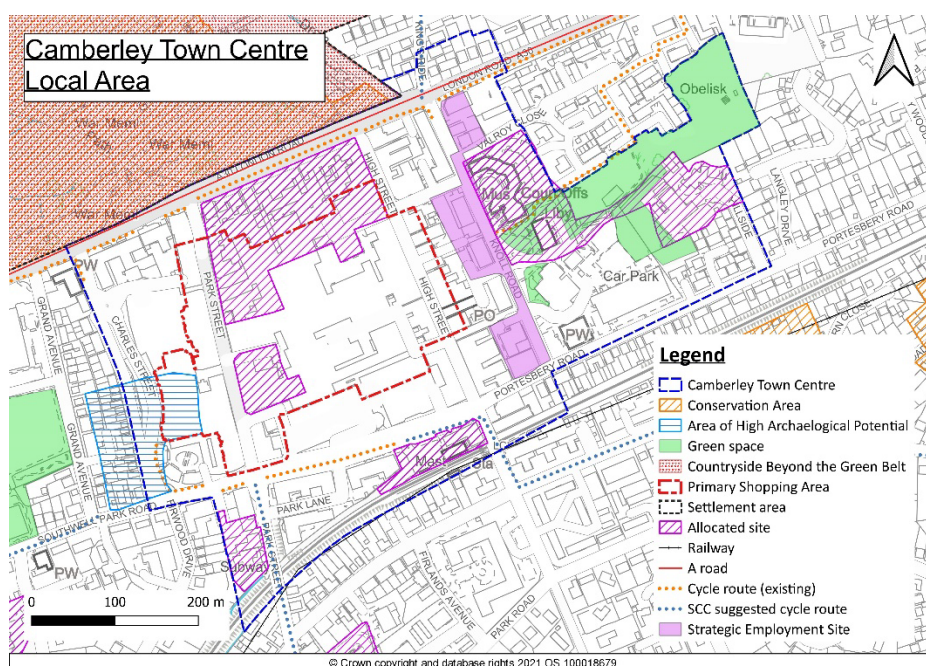
- 9.2.2 The fact that the great majority of supply is from sites located **within existing settlement boundaries** serves to indicate a tendency toward relatively accessible locations; and there is a clear focus of growth at Camberley, Frimley and Frimley Green, which are the parts of the Borough that benefit from highest levels of accessibility. 52% of the capacity identified through the SLAA (i.e. proposed allocations and smaller sites identified as deliverable or developable and therefore contributing to borough-wide supply) is within Camberley, which rises to 61% with the addition of sites in Frimley.
- 9.2.3 Focusing on **Camberley town centre**, the proposed strategy - as understood from the Local Plan and the SLAA - is broadly supported from an accessibility perspective. Policy HA2 (London Road Block; 550 homes) is of primary importance, with the policy including a detailed section setting requirements in respect of “Commercial and Community Uses”. The supporting text explains, amongst other things: *“Regeneration of the London Road Block will improve the integration of services for the public... development provides an opportunity to deliver a dynamic and sustainable area for living, working and visiting, with direct pedestrian links to the Square Shopping Centre, the High Street, Camberley Station....”*

- 9.2.4 Policy HA3 (Land East of Knoll Road Site Allocation; 475 homes) then deals with the other centrally important town centre allocation, although the proposal here is not to deliver a mixed used scheme to include commercial and community uses, but rather a scheme focused on residential, supporting infrastructure, public realm and the protection and enhancement of the existing designated green space. The result will be a considerable reconfiguration of uses within the town centre, given the extent of existing community uses on-site. However, these are matters that have been explored through town-centre studies over recent years, including through the adopted Town Centre AAP, and can be given further detailed consideration ahead of plan finalisation. It is important to note that the site allocation policy for this plan is for the first phase of a likely wider scheme. The plan document explains:

“The allocated site comprises a 2.44 hectare area, which currently comprises the Surrey Heath Borough Council offices, Camberley library, and the former Portesbury School. Camberley Theatre and the Knoll Road Multi-Storey Car Park, amongst other uses, adjoin the site to the south-east, comprising a further 1.77 hectare area. The further opportunity area is expected to be developed beyond the plan period and is therefore not allocated in this Local Plan. The further site area will be reassessed in terms of its deliverability during any Local Plan review.”

- 9.2.5 With regards to the other two town centre allocations (Land East of Park Street, North of Princess Way (former House of Fraser), 120 homes; and Camberley Station, 75 homes), there is a clear focus on aligning with the overarching strategy for the town centre. For example, proposals for the former site are required to support *“the broader regeneration of Camberley Town Centre, providing a contemporary and sustainable development that delivers an attractive and accessible public realm, including integrated services for the public.”* It is recommended that the reference to ‘integrated services’ is clarified.

Figure 9.1: Proposed town centre designations



- 9.2.6 Elsewhere within the **urban area** there are three further proposed allocations and, in each case, site specific policy seeks to ensure that opportunities to improve permeability and links to key destinations area realised. The largest is Sir William Siemens Square, Chobham Road, Frimley (200 homes), where the requirement is to *“incorporate improved pedestrian and cycle access to, and through, the site, with appropriate linkages to Frimley District Centre and the Station.”* Also of note is the existing community use onsite at Camberley Centre, France Hill Drive, Camberley (35 homes), with the requirement to *“retain the existing educational community use on-site, or re-provide the use at a suitable off-site location.”*
- 9.2.7 Aside from the proposed allocations, one smaller SLAA site of note in the urban area is Site 329, which is located next to Frimley Green local centre and proposed for a relatively high density scheme of 17 homes.
- 9.2.8 Across the **villages** the primary focus of growth (both ‘new’ sites and in total) is at Bagshot (which benefits from a district centre and public transport connectivity) and at Deepcut (where new community infrastructure is coming forward as part of the Princess Royal Barracks strategic scheme, although this is otherwise quite a rural area). Taking the proposed non-committed allocations in turn:

- Bagshot Depot and Archaeology Centre, London Road, Bagshot (50 homes) – the site-specific policy is brief, with just one criterion (on the historic environment), but it is recognised that this site benefits from excellent proximity to Bagshot rail station.
- Land east of Benner Lane (partial Housing Reserve Site), West End (73 homes) – a requirement to *“provide linkages to West End Local Centre through improved pedestrian and cycle access to the site.”* The local centre is over 500m distant, although the site does benefit from an adjacent primary school.
- Land at Frimhurst Farm, Deepcut Bridge Road, Deepcut (65 homes) – the site is separated from the Mindenhurst / Princess Royal Barracks strategic scheme by the Basingstoke Canal, but is within 500-600m of the forthcoming local centre, and there appears to be a good footpath link along the road.
- Chobham Rugby Club, Windsor Road, Chobham (91 homes) – a detailed site specific policy requires:
 - “Secure a suitable alternative location for the re-provision of the existing community and recreational uses on-site, within the Borough, which would be secured through an S106...”
 - “Retain an appropriate provision of open green space on-site to be accessible by local residents, which is well-integrated into a network of green infrastructure throughout the site.”
 - “Deliver a site layout that encourages permeability throughout the site and incorporates suitable pedestrian and cycle access from the site to nearby community facilities; in particular, to encourage linkages to the south toward Chobham high street.”

9.2.9 With regards to smaller deliverable/developable SLAA sites within villages, none give rise to any major concerns in respect of accessibility, and it is noted that proposed densities/capacities set out in the SLAA do respond to accessibility levels. For example, with regards to Site 908 at Lightwater the SLAA explains: *“Surrounding densities approximately 30-35dph, but as the site contains substantial built form and is close to Lightwater Local Centre, partial flattened development could be considered.”* However, Sites 236 and 573 at Bisley are notable for being located near to the southern extent of the settlement, around 800m from the neighbourhood parade located near to the northern extent of the village.

9.2.10 Finally, and importantly, there are several small sites within the **CBGB** that are not adjacent to a settlement boundary, specifically:

- Bagshot - Sites 407, 408 and 901 are located to the south of the village, over 1km from the district centre, although there is a cycle path along the A30, and also potentially good bus connectivity.
- Deepcut - Site 757 is a relatively large site located to the south of the Basingstoke Canal, with the SLAA identifying capacity for 21 homes. There will be a need to carefully consider footpath connectivity to Deepcut and/or Frimley Green, e.g. considering the narrow footway along Deepcut railway bridge.
- Lightwater / Windlesham - Site 834 is located in the Green Belt between the two villages, but the SLAA explains the potential to deliver seven homes on PDL without GB release. There is a footpath along the road to Lightwater, but this is narrow and near non-existent over the bridge crossing the Windle Brook.

9.2.11 With regards to **thematic policies**, a wide range of policies are supportive of accessibility objectives, and none are identified as giving rise to any notable tensions. Policy **CTC1** (Camberley Town Centre) is considered to be of particular importance, recognising that there could potentially be significant windfall development in the town centre over the plan period, and it will be critically important that any such schemes come forward in line with an established strategy. The supporting text to the policy explains that key challenges relate to legibility, public realm and service areas, and the policy then seeks to respond to these challenges, mindful of the wider context in respect of (the linked matters of): Covid19 recovery; online retail; and new permitted development rights, which mean that there is much greater flexibility for changes of use in town centres without the need for planning permission. One important consideration, amongst others, relates to definition of the Primary Shopping Area (PSA), informed by the Town Centre Uses Study (2020). A consolidated PSA is defined by Policy **CTC2**, with the supporting text explaining:

“Whilst the need to be flexible and adaptable is recognised, the vitality of the town centre can be impaired when the core retail frontages are fragmented. A study by KPMG on the impact of Covid-19 on town centres recognised that ‘shoppers are attracted to a cluster of shops rather than a single stand-alone outlet’. As some control over changes of use will remain where planning permission is required, the Council considers that it remains appropriate to seek to retain a retail core where the impact of a change of use on the vitality and viability of the centre can be considered. This is consistent with the NPPF 2021 which supports defining primary shopping areas and policies for the uses that will be permitted.”

- 9.2.12 A range of other policies within the ‘Town Centres, Retail and Economy Policies’ section of the Local Plan are also relevant, and supportive of ‘accessibility’ objectives. Policy ER6 (Frimley Park Hospital) is of particular note, which supports development proposals *“for the retention and improvement of healthcare facilities... [that] form part of a comprehensive development strategy or business plan...”*

Conclusion

- 9.2.13 The reconfiguration and regeneration of Camberley town centre represents a considerable opportunity to maintain and enhance the town centre’s community function, ensuring that it retains its role as the primary community infrastructure hub within the Borough, is an attractive place to visit and spend time and is easily permeable and navigable on foot. All five town centre allocations represent important components of the overall strategy (albeit one of these is already committed), in particular the two largest allocations, namely London Road Block (which will see an underused site in a town centre core location become a new central focus of the centre) and Knoll Road (which is at the edge of the town centre, and currently comprises a range of uses). Elsewhere there are limited community infrastructure opportunities set to be realised through the proposed growth strategy, and a further consideration is the proposal is to support housing growth at several small sites not linked to settlement boundaries, and hence in less accessible locations, although these sites together comprise only a small element of the overall strategy. With regards to site specific policies, there is a clear focus on use mix and realising opportunities for increasing pedestrian permeability and improving offsite walking/cycling links. With regards to borough-wide development management policies, numerous policies are supportive of accessibility objectives (no tensions are highlighted), with Policy CTC1 (Camberley Town Centre) considered to be particularly important.
- 9.2.14 Overall, ‘**positive effects of limited or uncertain significance**’ are predicted. It is worth highlighting that benefits will largely be felt in the long term, given the time that the town centre sites will take to come forward (and Land East of Knoll Road phase two is programmed for the next plan period), hence it will be important to maintain a focus on ‘easy win’ opportunities for supporting the town centre in the shorter term.

9.3 Air quality

- 9.3.1 Sustainability objectives include:

- Ensure air quality continues to improve in line with national and/or WHO global targets
- Reduce noise pollution

Discussion

- 9.3.2 None of the proposed sites intersect an AQMA; however, several are in proximity to a main road and/or a railway line, which could suggest a risk of problematic air and/or noise pollution, plus there is a need to consider other potential pollution sources, including employment uses. The following sites are of note:
- **Bagshot** - Site 247 is adjacent to two a-roads (the A30 and the A322 dual carriageway) and the railway. Through an early iteration of this appraisal it was recommended that site specific policy might be expanded to cover the matter of pollution from these sources, and this recommendation was then actioned. Also, several other small sites are located adjacent to the A30.
 - **Camberley** – several sites are adjacent to the A30 or the railway, although none are in close proximity to the M3 (this is similarly the case for Frimley, to the south of the motorway). Site specific policy for Camberley Station (75 homes) requires that proposals: *“be informed by the results of a full Noise Impact Assessment that considers the proximity to the railway line.”*
 - **Deeput** – two sites flank the railway line, one of which is a proposed allocation in the plan (65 homes) and one of which is not (21 homes). The proposed site specific policy requires that proposals: *“demonstrate that the detailed site layout has been informed by the proximity to the railway flanking the southern boundary of the site regarding safety, noise, and visual barrier effects... [and] retain and strengthen the existing tree planting and landscape buffering between the site and the railway line on the southern boundary of the site, to reduce noise and visual impacts from the railway.”*
 - **Windlesham** – Site 844 (9 homes) is near adjacent to the M3 (this is the only deliverable or developable SLAA site in proximity to the motorway, which is overall a strategy that is supported, noting experience from elsewhere, for example Longcross Garden Village in Runnymede Borough).

- 9.3.3 With regards to the risk of growth leading to traffic through an AQMA, or otherwise exacerbating or creating problematic air and/or noise pollution, it is difficult to draw strong conclusions ahead of detailed traffic modelling. However, there will clearly be a need to ensure that a relatively high growth strategy for the main **urban area** does not lead to issues. With regards to parking, the proposal for the two main town centre allocations (1,072 homes in total) is as follows:
- East of Knoll Road - “... provision in accordance with adopted parking standards, providing adequate public, private and on-street vehicle and cycle parking to meet the needs of residents and visitors”.
 - London Road Block- “provide suitable, well integrated parking provision in accordance with adopted parking standards for the proposed land uses, along with provision of adequate public car and cycle parking to serve the wider town centre and to meet the needs of residents and visitors”.
- 9.3.4 Following transport modelling it will be important to give consideration to the possibility of air quality impacts both within and outside of the Borough. It is noted that Surrey County Council stated the following through the Issues and Options consultation in 2018: “It is suggested that specific reference is included in the Local Plan to the joint working being undertaken in key areas, including the Blackwater Valley, to produce a plan for action to reduce the high levels of NO₂, with partners including...”
- 9.3.5 With regards to **thematic policies**, none give rise to any notable tensions with air quality objectives, whilst Policy **E4** (Pollution and Contamination) sets out to ensure that development “does not give rise to, or would be subject to, unacceptable levels of pollution...” Another policy of note is Policy CTC1 (Camberley Town Centre), for example the requirement to deliver “a safe, healthy and accessible environment, supporting the 20 Minute Neighbourhood principles”. It is recommended that consideration is given to opportunities to support last mile deliveries by non-car modes.

Conclusion

- 9.3.6 Ahead of transport modelling it is not possible to confirm whether or not the proposed growth strategy will lead to increased traffic through a known air pollution hotspot (which principally means an AQMA). However, early indications are that issues/impacts are limited, mindful that many areas experiencing problematic air pollution are set to see an improving situation over the plan period – all other things being equal – due to the national switch-over to electric vehicles (although issues with particulates will remain, including from brake, tyre and road wear, mindful of heavier EVs). Regardless, there is a need to carefully consider proposed allocations in proximity to the M3 (just one small site for 9 homes), busy a-roads and/or the railway lines, both from an air quality and a noise/vibrations perspective. With regards to site-specific policies, there is a requirement to consider noise impacts where necessary, although there could be the potential for further detail, e.g. specifying parts of the site that should be left undeveloped. With regards to borough-wide development management policy, in addition to the pollution focused policy (Policy E4), policy for Camberley town centre is of note, including for supporting 20 minute neighbourhood principles. Overall, whilst there are certain tensions with air/noise pollution objectives, **neutral effects** are predicted from a borough-wide perspective.

9.4 Biodiversity

- 9.4.1 Sustainability objectives include:
- Conserve and enhance the Borough’s biodiversity
 - Ensure the protection of the Special Protection Areas (SPAs)

Discussion

- 9.4.2 Biodiversity is a centrally important constraint to growth in Surrey Heath, given the Borough’s close association with the internationally important Thames Basin Heaths Special Protection Area (TBHSPA).
- 9.4.3 The first point to note is that whilst all proposed sites are beyond the **400m TBHSPA buffer zone**, several are located not far beyond. There is confidence in the strategy for avoiding / mitigating effects, and this matter is a focus of detailed consideration through a Habitats Regulations Assessment (HRA). However, there will be a need for further consideration following consultation with Natural England and other organisations with an interest in the SPA and wider matters relating to biodiversity and nature recovery.

- 9.4.4 The next matter for consideration is then the risk of impacts to the nationally designated **Basingstoke Canal SSSI**, with two sites wholly or partly adjacent. However, these schemes are modest in scale, and low proposed densities serves to indicate good potential to maintain the mature trees onsite, particularly those adjacent to the canal. A design cue might be taken from the nearby committed Princess Royal Barracks strategic site, which is delivering a woodland buffer between new homes and the canal.
- 9.4.5 The next matter for consideration is growth in proximity to locally designated Sites of Nature Conservation Importance (**SNCI**s), including one site at Deepcut that is adjacent to the extensive woodland SNCI between Deepcut and Frimley (mostly MOD land), and it is noted that this site includes extensive tree cover. However, this is a small site for just 17 homes. There is also a sensitivity along the Blackwater Valley at Mytchett, where there are two SLAA sites (23 homes in total) closely associated with the river corridor, including a site for 7 homes adjacent to an SNCI that also intersects woodland priority habitat.
- 9.4.6 Finally, there is a need to consider sites intersecting woodland **priority habitat** or tree preservation orders (**TPO**s) or otherwise with extensive **tree cover**. There are several such sites, including proposed allocations (discussed below) and smaller SLAA sites at Bagshot, Camberley, Deepcut, Frimley, Mytchett and Windlesham. For example, Site 408 at Bagshot comprises woodland shown on the pre-1914 OS map, and around half is shown as priority habitat by the nationally available dataset. Also, at Camberley, Site 717 is covered by an area TPO, whilst Site 801 is described as being located in a “verdant” area with “*vigorous hedge boundaries.*” Matters relating to onsite woodland and trees are discussed further below.
- 9.4.7 Focusing on non-committed **proposed allocations**, the following are of particular note:
- Land east of Benner Lane (partial Housing Reserve Site), West End (73 homes) – intersects a significant area shown as priority habitat by the nationally available dataset and other mature woodland/forestry (not shown as wooded on the pre-1914 OS map). Site policy requires proposals to “*incorporate a significant landscape buffer along the eastern edge of the site... helping to preserve the rural character...*”
 - Land East of Knoll Road, Camberley Town Centre (475 homes) – is sensitive on account of significant onsite mature trees and greenspace, including areas of priority habitat and a small area of TPO. Policy HA3 requires, amongst other things: “*a green corridor incorporating Camberley Park and The Obelisk, which will form part of the wider green infrastructure network in Surrey Heath, enhancing the ecological value of the site’s surroundings and contributing to overall biodiversity net gain.*”
 - Land at Frimhurst Farm, Deepcut Bridge Road, Deepcut (65 homes) – is adjacent to the Basingstoke Canal SSSI, hence a low development density is proposed and site-specific policy requires that proposals “*demonstrate that the proximity of the site to the Basingstoke Canal SSSI has been taken into consideration.*” An early iteration of this appraisal recommended that the policy might be supplemented with added detail, including mindful of mature trees potentially supporting the functioning of the SSSI, and this recommendation was subsequently actioned.
 - Sir William Siemens Square, Chobham Road, Frimley (200 homes) - does not intersect TPOs, but the site-specific policy requires: “*contribute to the urban greening of the area, providing integrated amenity roof terraces and/or atrium courtyards within the envelope of the development... retain the continuous green, rural character of Chobham Road, including the retention of mature trees...*”
 - Camberley Centre, France Hill Drive, Camberley (35 homes) – does not intersect TPOs, but does include significant onsite trees, hence policy requires: “*retain as far as practicable the existing abundance of trees and landscaping, which contributes to the local distinctiveness of the site.*”
- 9.4.8 It is also noted that policy for one of the committed allocations (134 and 136 London Road, Bagshot), which presumably aligns with the conditions of the planning permission, includes notable detail on TPOs: “*provide high-quality landscaping and usable private and communal amenity spaces, whilst avoiding future pressures to remove TPO trees.*” This potentially serves to highlight a matter that warrants being given early consideration through site-specific policy for other sites, with a view to avoiding issues down the line.
- 9.4.9 Finally, there is a need to consider one particular site identified as developable by the SLAA, but not allocated in the Local Plan on account of the capacity falling below the 25 homes threshold, namely **Land North of Guildford Road, Deepcut** (Site 757; 21 homes). This site is sensitive on account of intersecting the TBHSPA buffer (also seemingly well linked by public right of way to the SPA, although the part of the SPA that is open access land is also MOD land with managed access), being located adjacent to the Basingstoke Canal SSSI and being heavily wooded, with the nationally available dataset suggesting that almost the entire site comprises priority habitat woodland (the site is shown as comprising wooded ‘old gravel pits’ on the pre-1914 OS map).

- 9.4.10 It is recommended that consideration be given to formal allocation of this site, despite falling below the 25 homes threshold, in order to ensure that the anticipated number of homes can be delivered alongside measures sufficient to avoid and mitigate undue biodiversity impacts, also mindful of in-combination effects with nearby Land at Frimhurst Farm (65 homes).
- 9.4.11 With regards to **thematic policies**, none give rise to any notable tensions with biodiversity objectives, and the following should assist with mitigating growth related issues/impacts and realising benefits:
- Policy **E1** (Thames Basin Heaths Special Protection Area) – confirms the well-established arrangements for ensuring that development does not give rise to adverse effects on the SPA.
 - Policy **E2** (Biodiversity and Geodiversity) – includes an important focus on Biodiversity Opportunity Areas (BOAs) as a key geography, within which development proposals should take account of established conservation objectives. There will be a need to consider whether compensatory habitat enhancement / creation measures, necessary as part of the biodiversity net gain regime, should be directed to BOAs ahead of a Local Nature Recovery Strategy (LNRS) covering Surrey Heath. It is noted that the Local Plan commits to a Climate Change and Green Infrastructure SPD.
 - Policy **E3** (Biodiversity Net Gain) – importantly requires going beyond the 10% national requirement set out in the Environment Act, requiring that: *“Development proposals will be permitted provided that they can demonstrate the provision of a minimum 20% increase in biodiversity units when set against the baseline biodiversity value and be in accordance with national guidance.”* One matter for detailed consideration is the potential to secure offsite biodiversity units within SANG, recognising the importance of not conflicting with the priority recreational function of SANGs.
- 9.4.12 The other key policy for consideration here is Policy **IN5** (Green Infrastructure), which includes a particular focus on the importance of securing a *network*, seeking to avoid *“loss or fragmentation of existing green infrastructure assets/components or compromise the integrity of the green infrastructure network...”*

Conclusion

- 9.4.13 There are some concerns with several sites, including sites in proximity to the TBHSPA (albeit outside the 400m buffer), the Basingstoke Canal SSSI and SNCIs, and a number of sites intersect woodland or contain extensive mature trees. It is recognised that there are also a number of site specific opportunities, particularly in respect of urban greening, and that borough-wide thematic and site-specific policy is proposed to avoid and mitigate negative effects, and the proposal is to secure significant biodiversity net gain. However, at this stage in the plan-making process, it is appropriate to flag **‘a negative effect with limited or uncertain significance’** noting the inherent sensitivity of the Borough. A recommendation is made in respect of one SLAA site at Deepcut for 21 homes that may warrant a formal allocation and site-specific policy, despite falling below the 25 homes threshold that triggers a Local Plan policy, to reflect sensitivities. The views of biodiversity focused organisations, including Natural England, the Wildlife Trust and the Woodland Trust, will be sought through the current consultation and considered ahead of plan finalisation, to ensure that the Local Plan growth strategy both minimises negative impacts on biodiversity and realises strategic opportunities as far as possible, ahead of a Local Nature Recovery Strategy (under the Environment Act) for Surrey or another geography covering the Borough.

9.5 Climate change adaptation

- 9.5.1 Sustainability objectives include:
- Minimise the risk of flooding
 - Encourage reduced water consumption

Discussion

- 9.5.2 The primary consideration here is flood risk, with other climate change adaptation considerations (see discussion in [Appendix 1](#) of the Climate Change Study, 2020) considered under other topic headings.
- 9.5.3 The primary point to note is that Site 912 at **Mytchett** significant intersects flood zone 3. However, the proposed capacity (16 homes) amounts to a low density (10.7 dph), hence it should be possible to avoid development in the most at risk parts of the site. The second point to note is that several sites modestly intersect flood risk zone 3, such that there is confidence in the ability to avoid built form in this zone.

- 9.5.4 There is also a need to consider **flood risk zone 2**, which should be avoided if possible, mindful of the risk of increased flood risk under climate change scenarios (see [Section 9](#) of the Climate Change Study, 2020). Several sites do significantly or entirely intersect this zone, hence there is a degree of concern, but it will be for the Environment Agency to comment in detail through the consultation. Sites include:
- **Bagshot** – one of the small SLAA sites to the south of the town (Site 317) is entirely within flood zone 2, and partially in flood zone 3. The SLAA capacity of 20 homes amounts to 133 dpa, with the SLAA explaining: *“25 dwellings, as suggested by the site promoter, is considered high given character, context and flooding issues. However, flatted development may be appropriate as the site is adjoined by 3 storey flatted development.”* It is recommended that consideration is given to a formal allocation and site specific policy, to ensure that steps are taken to avoid and mitigation (e.g. through design) flood risk.
 - **Camberley** – Site 878 is entirely within flood zone 2, with the SLAA explaining: *“Capacity as approved (expired) planning permission.”*
 - **Chobham** – Site 548 is located to the Green Belt to the south of the village, and intersects flood zones 2 and 3. However, the SLAA identifies capacity only at one part of the site, explaining: *“Part of site (parcel A) is previously developed and contains some existing structures. A significant part of parcel A is not within EA flood zones 2 or 3. Therefore, some development would be suitable at parcel A...”*
- 9.5.5 A further consideration is **surface water flood risk**, with the primary consideration potentially Camberley town centre and land adjacent to the railway line that passes through the urban area. Another flood risk consideration can be the risk of development leading to increased surface water run-off and/or reduced flood water storage capacity and, in turn, increased **downstream flood risk**. However, it is difficult to reach strong conclusions given potential to deliver sustainable drainage systems (SuDS). Downstream flood risk may be a consideration in respect of Site 912 at Mytchett, given extensive residential areas affected by flood risk downstream (in Guildford Borough), and the in-combination impact of growth at West End on downstream flood risk could also be a consideration, although there are few properties at risk.
- 9.5.6 With regards to **thematic policies**, none give rise to any notable tensions with climate change adaptation objectives, and a wide range of policies should assist with mitigating growth related issues/impacts and realising benefits, including:
- Policy **SS3b** (Climate Change adaptation) – is an overarching policy signposting to other policies, but which also sets out specific requirements, including: *“Development proposals will need to demonstrate how they are maximising their adaptive capacity.”*
 - Policy **E6** (Flood Risk and Sustainable Drainage) – sets out to *“ensure that development in the Borough reduces flood risk and minimises the impact of flooding”*, including by steering development to the areas with a lower risk of flooding. There is also a notable proposal to *“safeguard the ‘undeveloped’ flood zone for flood management purposes with the exception of the provision of essential infrastructure.”*

Conclusion

- 9.5.7 At this stage, it is appropriate to flag **‘a negative effect with limited or uncertain significance’** ahead of receiving detailed comments from the Environment Agency through the current consultation. Sites at Mytchett and Bagshot stand-out as larger sites (16 and 20 homes respectively) affected by flood risk. Flood risk can typically be addressed through borough-wide rather than site-specific policy, but river valley sensitivities at these sites potentially serve as reasons to consider preparing site specific policies.

9.6 Climate change mitigation

- 9.6.1 Sustainability objectives include:
- Reduce greenhouse gas emissions
 - Increase energy efficiency and increase the use of renewable energy
 - Encourage the use of more sustainable modes of transport and reduce traffic congestion

Discussion

- 9.6.2 The primary consideration here is per capita built environment emissions, given the potential to cover matters relating to transport emissions under other topic headings.

- 9.6.3 As discussed in Section 5.3 and Section 6, strategic growth locations can give rise to an opportunity to minimise built environment emissions, hence the regeneration of Camberley town centre represents an opportunity. The four proposed allocations are somewhat distributed across the town centre, but still located in relatively close proximity, such that consideration might be given to a heat network linking two or more sites (although practice is increasingly focused on smaller scale low temperature heat networks).
- 9.6.4 Decarbonisation is a focus of site specific policy for the two large sites. Specifically, at both sites the requirement is to *“utilise net zero carbon design, including on-site renewable energy and/or decentralised energy generation.”* Also, schemes: *“... will be required to meet a net zero carbon output through either on-site renewable energy provision, decentralised energy generation, or a combination...”*
- 9.6.5 With regards to the wider package of identified sites, all are modest in scale such that there is little reason to suggest any particular built environment decarbonisation opportunity. An important consideration locally is understood to be the implications of grid constraints for EV charging; however, it is not possible to differentiate between sites in this respect. Another consideration is support for reuse of existing buildings, as opposed to demolition and rebuild, and it is recommended that opportunities for reuse are explored.
- 9.6.6 With regards to **thematic policies**, none give rise to any notable tensions with climate change mitigation objectives, and a wide range of policies should assist with mitigating growth related issues/impacts and realising benefits. In particular, there is an overarching strategic policy supported by two detailed policies in the ‘Environment’ and ‘Design and heritage’ sections of the Plan, as follows:

- Policy **SS3a** (Climate Change mitigation) sets out a helpful framework of key issues and objectives. One notable requirement is to ensure *“no net loss in the carbon storage capacity provided by the Borough’s trees”*, hence there will be a need to carefully consider loss of mature trees within development sites.

Another notable requirement is to *“manage construction waste effectively and responsibly to reduce the carbon emissions of construction activities, set out in policy DH8.”* This is an important consideration, with an increased focus nationally and internationally on minimising ‘non-operational’ building emissions, including by reusing existing buildings ahead of demolition and rebuild where possible. This aligns with taking a ‘circular economy’ and ‘whole life cycle carbon’ approach to built environment decarbonisation.

Finally, the following is a key requirement: *“Development proposals will need to demonstrate how they are maximising reductions in carbon emissions and contributing to the decarbonisation trajectory for net zero by 2050... proposals for over 500 dwellings will be required to deliver zero carbon development, either through on-site measures or, if it is demonstrated that is not feasible, through carbon offsetting.”* There will be a need to carefully consider the term ‘maximising’, and the precise means by which a sufficient contribution to objectives can be demonstrated. On the matter of offsetting, it is recommended that the policy is clear that onsite emissions, and therefore the need to offset, should be minimised.

- Policy **E5** (Renewable and Low Carbon Energy and Heating Schemes) – amongst other things, requires that larger proposals *“incorporate measures to supply a minimum of 25% of the development’s energy needs from renewable and/or low carbon technologies...”* There is a need to carefully consider how this requirement aligns with the ‘fabric first’ requirement set out under Policy DH8. There is also a need to define the technologies in question, e.g. Figure 9.1 defines low carbon *heating* technologies.

Figure 9.2: Low carbon heating technologies
From the UK Heat and Buildings Strategy (2021)

Technology	Description
Air source heat pumps	Extract heat from the outside air to heat your home and hot water.
Ground source heat pumps	Extract heat from pipes that are buried in the ground to heat your home and hot water.
Hybrid heat pumps	Combine heat pump and standard boiler technology to heat your home and hot water. Use of smart controls help optimise the system based on cost or efficiency.
Biomass boilers	Work in a similar way to a standard gas boiler to heat your home and hot water using a renewable energy source such as wood pellets as fuel.
Solar thermal panels	Capture heat from the sun to provide hot water, typically in a storage tank.
Hydrogen boilers	Work in a similar way to standard gas boilers to heat your home and hot water but use hydrogen gas rather than natural gas as fuel. This technology is not commercially available in the UK and is dependent on the extent to which hydrogen could replace natural gas in the gas grid.
Hydrogen-ready boilers	Optimally designed to run using 100% hydrogen gas but are initially configured for use with natural gas to heat your home and hot water. Minimal component conversion is required to convert appliances to use with hydrogen. This technology is not yet commercially available.
Heat networks	Provide heat or cooling from a central source and distribute it to multiple customers in a building or across several buildings.

- Policy **DH8** (Building Emission Standards) – deals with both residential and non-residential developments, and sets out specific requirements for non-residential. With regards to residential schemes, which will comprise the great majority, there is not a specific requirement to go beyond the requirements of Building Regulations, which are set to be tightened in 2022 as an interim step towards the Future Homes Standard, but there is a requirement for *“a fabric first approach to contribute significantly towards achieving carbon emission reductions in accordance with Policy SS3.”*

Conclusion

- 9.6.7 Focusing on minimising per capita built environment emissions it is clear that the proposed strategy for growth and regeneration within Camberley town centre represents a major opportunity, and site specific policy is proposed to ensure that the opportunity is realised, although there could be the potential for further work leading to added policy detail, as opposed to deferring work to the development management stage, when it can transpire that options are more limited. With regards to the wider package of identified sites, all are modest in scale such that there is little reason to suggest any particular opportunity, in respect of built environment decarbonisation, although the decarbonisation focused policies – SS3a, E5 and DH8 – will apply. In conclusion, having taken account of proposed borough-wide thematic and site-specific policy, **neutral effects** are predicted. There will be a need for further scrutiny, both through and subsequent to the current consultation, to ensure that every effort is being made to minimise per capita greenhouse gas emissions, including through spatial strategy and site selection.

9.7 Communities

- 9.7.1 Sustainability objectives include:
- Improve the population's health
 - Improve the education and skills of the local population
 - Reduce crime, fear of crime and social exclusion
 - Encourage the enjoyment of the countryside, open spaces and local biodiversity
 - Sustain and enhance the viability and vitality of town, district and local centres

Discussion

- 9.7.2 Aside from matters relating to access to community infrastructure and environmental quality/health, which have been discussed above, there are wide ranging other 'communities' related considerations, including around ensuring good health, which is a national priority at the current time.

- 9.7.3 As per the discussion above, under Accessibility, a key consideration is the preferred strategy for **Camberley town centre**. Taking the four proposed allocations in turn:

- London Road Block (550 homes) – the detailed policy (Policy HA2) presents a range of detailed criteria in respect of: commercial and community uses, public realm; design and character; and infrastructure (transport, green and other). For example, and notably, there is potential to accommodate *“a library and learning centre, and other community and health uses; and cultural, civic and leisure facilities...”*
- Land East of Knoll Road Site Allocation (475 homes) – the detailed policy (Policy HA3) is notably shorter than Policy HA2, and does not include a section on commercial and community uses (because the proposed scheme is not mixed-use to the same extent as London Road Block), but it is clear that the policy is tailored to reflect the particular issues and opportunities at this site.

For example, a range of policy criteria seek to respond to the onsite mature trees and greenspace, for example the requirement for *“an attractive new streetscape throughout the site, which utilises hard landscaping to differentiate pedestrian, cyclist, and vehicular zones, and soft landscaping incorporating mature tree planting and vegetated areas... [and] a green corridor linking the site to Knoll Road and Camberley High Street, incorporating Camberley Park and adjoining woodland to the east, providing an enhanced green enclave within Camberley Town Centre, for residents and visitors to enjoy.”*

- Land East of Park Street, North of Princess Way (120 homes) – site-specific policy is strongly focused on design and wider place-making and town centre regeneration considerations, for example proposals must *“utilise high-quality architectural design to improve engagement with the street-scene, contributing to urban greenery and providing distinctive public realm within this prominent central location.”*
- Camberley Station (75 homes) – as well as a requirement for a 'new or improved train station', proposals should *“incorporate high-quality, design-led, public realm and wayfinding improvements for pedestrians and cyclists, improving connectivity to Camberley Town Centre and to both Portesbery Road and Knoll Road. Public realm improvements should focus on improving connectivity, safety, and sense of place.”*

- 9.7.4 Site specific policy for the following **other proposed allocations** is also of note:

- Camberley Centre, France Hill Drive, Camberley (35 homes) – amongst other things, the requirement is to *“implement a design-led development that is sympathetic to and integrates well with the scale, height, and character of the existing Adult Education Centre building; [and] retain as far as practicable the existing abundance of trees and landscaping, which contributes to the local distinctiveness...”*
 - York Town Car Park, Sullivan Road, Camberley (27 homes) and Sir William Siemens Square, Chobham Road, Frimley (200 homes) – are two further sites where the requirement is to *“deliver a high-quality, design-led development that is sympathetic to the existing character... [having regard to named local sensitivities, for example Frimley Village in the case of the latter site]”*
 - Land east of Benner Lane (partial Housing Reserve Site), West End (73 homes) – is adjacent to a recent/current housing growth area, hence policy requires that proposals *“be sympathetic to and integrate with the design and layout of surrounding development at the former West End Reserve Site.”*
 - Chobham Rugby Club (91 homes) – amongst other things, sets out a need to consider *“the amenity of neighbouring residential areas and to enhance the green, open character of... open space to the east.”*
- 9.7.5 With regards to package of smaller deliverable/developable SLAA sites, a key point to note is that because of their small nature these sites will often be able to deliver relatively little in the way of ‘planning gain’ to the benefit of the existing community or new residents. The appraisal of reasonable growth scenarios in Section 6 presents further discussion around the potential ‘communities’ benefits of growth at scale.
- 9.7.6 With regards to **thematic policies**, none give rise to any notable tensions with communities objectives, and wide ranging policies are supportive of communities objectives. As per the discussion above, under Accessibility, Policy **CTC1** (Camberley Town Centre) is arguably of particular importance, and one notable requirement for consideration here is the requirement for proposal to contribute to: *“delivery of a healthy and vibrant, experience based town centre [that] provides for all sectors of the community.”*
- 9.7.7 The ‘Infrastructure’ focused policies also warrant consideration here, including Policy **IN4** (Community Facilities) and Policy **IN6** (Green Space, which set out the criteria that must be met in order for the loss of existing community facilities and green space respectively to be deemed acceptable.
- 9.7.8 There is also a need to consider Policy **DH1** (Design Principles), which covers a wide range of issues, such that it might be discussed under numerous topic headings. Amongst other things, there is a focus on ‘access and inclusion’, with measures specified to ensure that developments meet the needs of all users, and also a requirement to be *“flexible towards future adaptation in response to changing life needs.”*
- 9.7.9 Finally, Policy **DH2** (Making Effective Use of Land) is of note here (but again could also be discussed under numerous other headings). The policy sets out minimum density standards, relating to accessibility, but also includes flexibility for lower density schemes where necessary, e.g. on design grounds.

Conclusion

- 9.7.10 The regeneration of Camberley town centre represents a significant place-making opportunity, including the creation of two new residential ‘quarters’ and support for new, relocated/upgraded and more accessible community facilities. Proposed site-specific policy for the four town centre allocations is strongly focused on design and wider matters relating to place-making; however, there is a degree of variation across the other proposed allocations, in respect of the degree of focus on these matters. The proposed site specific policy for Chobham Rugby Club (91 homes) appears strong. Other sites are not assigned a site-specific policy, and as small sites will be associated with more limited place-making opportunity, but will need to come forward in line with borough-wide thematic development management policies including Policy **DH1** (Design Principles). Overall, **‘positive effects of limited or uncertain significance’** are predicted.

9.8 Economy and employment

- 9.8.1 Sustainability objectives include:
- Support inclusive and diverse economic growth
 - Maintain stable levels of employment in the Borough
 - Support existing business structure and businesses
 - Sustain and enhance the viability and vitality of town, district and local centres

Discussion

- 9.8.2 There is limited focus on delivering new employment land, which is appropriate given the discussion of objectively assessed needs set out in Section 5.3, but there is a carefully considered strategy for Camberley town centre, which should be supportive of its role as sub-regionally important hub of economic activity. In particular, Policy HA2 (London Road Block; 475 homes) requires a mixed use scheme to include *“office floorspace comprising conventional offices and/or flexible co-working space”*.
- 9.8.3 None of the proposed allocations require delivery of employment floorspace, which is potentially a matter that could be revisited subsequent to the current consultation, in light of any new evidence/understanding that might emerge, in respect of need for office and industrial employment floorspace.
- 9.8.4 There is also a need to consider sites identified as deliverable/developable for residential use within the SLAA that are currently in use for employment, albeit there is a need to be mindful of permitted development rights that can allow for a change of use from employment to residential via the prior approval process, i.e. without going through the planning application process.
- 9.8.5 A key site for consideration is Sir William Siemens Square Site, Chobham Road, Frimley (Site 907), noting that the Issues and Options document (2018) proposed allocation of a Strategic Employment Site, and the Employment Land Technical Paper (2019) supported continued use for employment, for example explaining: *“It is a high quality, high profile site... The main business uses... all align with Enterprise M3’s priority business sectors.”* However, the latest situation is that the site is vacant. It is recommended that consideration be given to the possibility of a mixed use scheme to include some office space.
- 9.8.6 Also, within the urban area, Sites 296 and 878 are both strongly associated with an existing employment area. Also, Site 314 comprises a builders merchants and Sites 717 and 721 comprise hotels.
- 9.8.7 Outside of the main urban area, one small site of note is Site 834, between Windlesham and Lightwater, which comprises a collection of buildings associated with Broadway Green Farm, seemingly including older farm buildings and some more modern industrial units. The SLAA explains: *“all current businesses would need to relocate if the site were to be developed for residential use. The Call for Sites submission advises that although there are several business tenants, they are on short-term flexible leases...”* The SLAA also explains (as it does for all sites with onsite employment): *“In accordance with Core Strategy Policy CP8, the loss of employment sites will only be permitted where wider benefits to the community can be shown. This can only be demonstrated through the planning application process.”* This is an important safeguard, but there is a need to consider implications for delivery risk.
- 9.8.8 Site 573 is another site currently in use for light industry, although the site has previously been granted planning permission for residential redevelopment.
- 9.8.9 With regards to **thematic policies**, none give rise to notable tensions with employment objectives, and numerous policies should assist with mitigating growth related issues/impacts and realising benefits, including the 13 policies presented in the ‘Town Centres, Retail and Economy Policies’ section of the plan.
- 9.8.10 Focusing on Policy **ER1** (Economic Growth and Investment), this sets out the framework approach, including a hierarchical approach to protecting Strategic Employment Sites and Locally Important Employment Sites. Policy **ER4** (Yorktown Business Park) then deals specifically with the largest employment site in the Borough, explaining: *“Due to Yorktown’s size, redevelopment opportunities, and wide range of accommodation attracting both small and medium-sized enterprises (SMEs) and larger organisations, the site has the potential and capacity to attract future economic development...”* Policy **ER5** (Rural Economy) is also of particular note, with the supporting text explaining: *“There are a number of businesses located within the rural areas of Surrey Heath which make a positive contribution toward the rural economy including small rural based enterprises and a number of larger employers.”*

Conclusion

- 9.8.11 There is limited support for new employment land, and some allocations that would see change of use from employment to residential, but the proposed strategy is understood to align with objectively assessed needs for employment land and sub-regional strategy established by the Local Enterprise Partnership (LEP), hence it is fair to predict **‘positive effects of limited or uncertain significance’**. Aside from the proposed growth strategy, borough-wide thematic policies are strongly supported in that the effect will be to ensure that existing employment land and town / district / local centres are given appropriate protection against change of use to residential, as far as is possible in the context of permitted development rights.

9.9 Historic environment

9.9.1 Sustainability objectives include:

- Protect and where appropriate enhance the landscape, buildings, sites and features of archaeological, historical or architectural interest and their settings

Discussion

9.9.2 Camberley **town centre** is notably associated with few designated assets. However, the High Street retains elements of the original Victorian and Edwardian character of Camberley as a late 19th century settlement adjoining the Royal Military Academy.

9.9.3 As such, building heights and massing are an important consideration. Site-specific policy includes:

- London Road Block (550 homes) – there is a notable requirement to *“incorporate buildings of no more than 3 storeys on the High Street frontage, which complement the historic Edwardian and Victorian character of this part of the town centre.”*
- Land East of Knoll Road Site Allocation (475 homes) – a key aim is “the protection and enhancement of the existing designated green space at Camberley Park including the wooded setting of the Grade II Listed Obelisk”. Further policy requires *“a design and layout that ensures new sightlines between the wooded setting of The Obelisk and the heart of Camberley Town Centre are established.”*
- Land East of Park Street, North of Princess Way (former House of Fraser; 120 homes) – the policy makes a number of points on design etc, including a requirement for proposals to provide *“flatted development above the ground-floor level at a suitable density for the town-centre location.”*
- Camberley Station, Station House, Pembroke Broadway (75 homes) – there is a requirement to *“be sympathetic to the complex surrounding context of the site with regard to scale, height, and massing. Particular consideration should be given to...”*

9.9.4 Certain other proposed allocations are associated with notable historic environment sensitivities:

- Bagshot Depot and Archaeology Centre, London Road, Bagshot (50 homes) - proposals are required to *“demonstrate that the design of the scheme is genuinely conservation-led, having special regard to the retention and enhancement of the character of the **Bagshot Park Conservation Area** and its setting, in which the Grade II listed Bagshot Park forms the centre piece.”*
- Land at Frimhurst Farm, Deepcut Bridge Road, Deepcut (65 homes) – “deliver a high-quality, design-led development that is sympathetic to the existing character of the area. Particular consideration should be given to the enhancement of the character of the **Basingstoke Canal Conservation Area.**”
- Land east of Benner Lane (partial Housing Reserve Site), West End (73 homes) - retain the **Grade II listed Malthouse Farm** and its curtilage, and preserve its setting. This is an issue that potentially warrants closer attention, with efforts potentially focused on *increasing* the value of the farmhouse as an asset that provides time depth and context to the 20th and 21st century expansion of West End. A cue could potentially be taken from the proposed site specific policy for Land west of Sturt Road, Frimley Green (160 homes), which has planning permission. The policy sets out a need to *“conserve and enhance the setting of the Grade II listed Church of St Andrews on the opposite side of Sturt Road, improving visual connections with the site. [emphasis added]”*
- Chobham Rugby Club, Chobham (91 homes) – is in close proximity to two listed buildings, but it is difficult to confidently suggest that the sports facility and pitches contributes to setting, also noting that the Chobham Club (Site 1001, 8 homes) is potentially a detracting feature.
- Camberley Centre, France Hill Drive, Camberley (35 homes) – *“retain and reuse the existing Adult Education Centre building, a **local heritage asset**, including the generous landscape setting.”*

9.9.5 There are also several **smaller SLAA sites** associated with historic environment sensitivity, including:

- Bagshot - Sites 317, 320 and 714 are located at or close to the northern edge of the historic core, with Site 320 located to the west of the A30 and therefore adjacent to Bagshot Park. However, all are previously developed sites and therefore associated with limited sensitivity.

- South of Bagshot – the four proposed small sites (one of which is adjacent to the current settlement boundary, four three of which are not) appear to be mostly associated with intensification of late 19th C or early 20th C homes in large plots, and there is one grade 2 listed building in the vicinity (potentially adjacent to a point of access for a 20 home scheme) and one locally listed building in the vicinity (adjacent to a proposed site for 8 homes). It is also noted that there is a non-designated milestone.
 - Bisley - Site 236 comprises land to the rear of three or four homes potentially with a degree of historic character, although none are locally listed and they are not shown on the pre-1914 OS map. The proposal is to support a high density scheme of approximately 80 dph.
 - Chobham - Site 548 is located outside of the proposed Green Belt inset boundary, but the site is partially PDL, such that some development could take place without the need for Green Belt release. The Conservation Area is adjacent, and the main building on the site is shown on the pre-1914 OS map.
 - Deepcut - Site 757 is located adjacent to the Basingstoke Canal SSSI and is currently heavily wooded. As per the discussion above, under Biodiversity, it is recommended that this site warrants consideration of a formal allocation and site-specific policy, despite falling below the 25 homes threshold (21 homes), noting the possibility of in-combination effects with nearby Land at Frimhurst Farm (65 homes).
 - Windlesham - Site 834 comprises a collection of buildings associated with Broadway Green Farm, seemingly including older farm buildings and some more modern industrial units. The site is located in the Green Belt between Lightwater and Windlesham, but the SLAA explains the potential to deliver seven homes without impacting on the openness of the Green Belt. A collection of farm buildings is shown on the pre-1914 OS map, although none of the buildings are designated in any way.
- 9.9.6 There is also a need to consider the matter of inseting Chobham from the Green Belt, as discussed in Appendix IV. In short, inseting could lead to a degree of additional infill although design and heritage polices will protect the village's strong historic character.
- 9.9.7 With regards to **thematic policies**, none give rise to any notable tensions with historic environment objectives, and the following should assist with mitigating growth related issues/impacts and realising benefits. The centrally important policy is Policy **DH7** (Heritage Assets), which deals with the various types of designated areas/assets in turn, including a focus on enhancing significance where possible, in accordance with national policy set out in the NPPF. The focus on the two local-level designations that deal with areas of archaeological interest is of note, as is the focus on locally listed buildings, as the approach to conserving/enhancing locally designated assets must be defined at the local level.

Conclusion

- 9.9.8 A number of sites are associated with a degree of historic environment sensitivity, but this is largely unavoidable, and borough-wide thematic and site specific policy is proposed to ensure that necessary steps are taken to avoid and mitigate negative effects and potentially realise benefits. Matters for further consideration, taking account of the consultation responses received from Historic England and other organisations with an interest in the Historic Environment, potentially include: the setting of the Basingstoke Canal Conservation Area (also accessibility and appreciation); the grade 2 listed farmhouse east of West End; and the cluster of small sites south of Bagshot. **Neutral effects** are predicted.

9.10 Housing

- 9.10.1 Sustainability objectives include:
- Meet identified housing need

Discussion

- 9.10.2 The primary point to make here is that a land supply is proposed that will enable the **housing requirement** to be set at 5,680 homes for the 19 year plan period, or 299 dpa on average, which is the figure arrived at by subtracting the agreed unmet need provision in Hart (41 dpa over the first 13 years of the plan period, or 533 homes in total) from the Borough's standard methodology derived LHN figure, which is 327 dpa, or 6,213 homes in total. On this basis significant positive effects are predicted.

- 9.10.3 The proposed **supply buffer** over-and-above the housing requirement is approximately 7%, which is considered in line with accepted practice, recognising that the strategy does not have a particularly high reliance on strategic sites (which are inherently associated with high delivery risk). However, there will be a need for further detailed work to understand delivery risks associated with numerous sites that form part of the borough-wide land supply position, both through and subsequent to the current consultation (indeed, scrutiny of matters relating to delivery risks and assumed timescales/phasing typically continue post submission). A range of site specific issues have been discussed above that could feasibly lead to viability and/or delivery challenges, for example in respect of onsite woodland / trees and onsite employment uses. It is also understood that the prevalence of current and former military operations means that ground contamination can be an issue. However, the preferred package of sites performs well in this respect, with the SLAA identifying contamination as a potential issue at just two small sites.
- 9.10.4 With regards to the **distribution and mix** of supported site, there is considered to be a good geographical spread and mix of site types and sizes. As can be seen from Table 2 in the current Local Plan consultation document, and as discussed in Section 5.4 of this report, Lightwater stands out as a settlement set to see a low growth strategy over the plan period,²⁶ but this appears to be a largely unavoidable situation, given the extent of environmental constraints. The other village set to see a low growth strategy is Bisley (where there is potentially a higher growth 'reasonable alternative'; see Section 5), although Bisley relates very closely to both West End (which is set to see relatively high growth over the plan period) and Woking.
- 9.10.5 One issue is potentially the number of sites identified by the SLAA that are unlikely to deliver **affordable housing** or where affordable housing delivery could potentially be constrained on account of abnormal development costs, mindful of NPPF paragraph 64, which states: *"Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount."* Around 25 of the sites identified as deliverable or developable by the SLAA are set to deliver 10 homes or fewer, and hence are not 'major developments';. However, the cumulative supply from these sites is a small component of the overall supply. Further discussion on affordable housing is presented in Box 6.1, above.
- 9.10.6 Another important consideration is the need for **Gypsy, Traveller and Travelling Showpeople** pitches / plots / sites, as understood from the Accommodation Needs Assessment (2020; available on the Local Plan evidence page [here](#)). Identifying land is understood to be challenging, and a matter that will need to be given further consideration prior to plan finalisation. The current proposal is to deliver pitches at one proposed allocation at Diamond Ridge Woods, Camberley. However, delivering pitches alongside 'bricks and mortar' housing can lead to challenges. Further work is required to identify more suitable sites.
- 9.10.7 A further consideration is **specialist housing**, and in this respect it is noted that the SLAA supports a total of six sites for C2 older persons / extra care accommodation. A related consideration is in respect of 84-100 Park Street, Camberley, which currently has planning permission for 61 sheltered apartments, but which has now been identified as being suitable for a revised, residential (C3) development scheme.
- 9.10.8 With regards to **site-specific policy**, criteria on housing mix are presented for the two key (non-committed) strategic allocations, specifically:
- London Road Block (550 homes) – there is a requirement to *"deliver an appropriate mix of new homes, reflecting the evidence in the most up-to-date Housing Need Assessment, whilst having regard to the Town Centre location and the need to provide flatted development.... [and deliver] a combination of predominantly flatted development and elements of townhouses, recognising the Council's ambition to significantly increase density within the Town Centre, and make efficient use of land."*
 - Land East of Knoll Road Site Allocation (475 homes) – the is a requirement is for *"an appropriate mix of new homes, reflecting the evidence in the most up-to-date housing need assessment, whilst recognising the town-centre location; flatted development adjoining Knoll Road comprising 4 – 7 storeys (inclusive), reflecting the urban character of the area; [and] an appropriate mix of townhouses and small-scale flatted development at the former Portesbery School and adjoining Camberley Park, reflecting the verdant, wooded character of the area..."*

²⁶ The focus of discussion is on growth in dwelling stock over the plan period, i.e. from 2019, but there could also be merit to understanding which villages have grown more / less over the years preceding 2019, e.g. perhaps looking back to 2011.

9.10.9 With regards to **thematic policies**, there are total of seven housing focused policies, plus there is a need to be mindful of many other policies that could lead to a cost burden on development with implications for development viability (these matters will be explored in detail through a whole plan viability study).

9.10.10 Taking the housing-focused policies in turn:

- Policy H5 (Range and Mix of Housing) – notably sets requirements for Accessible and Adaptable Homes and Self-Build and Custom Housebuilding for sites of 20 or more net new dwellings.
- Policy H6 (Specialist Housing) – is supportive of specialist accommodation, including C2 older persons accommodation, provided certain criteria are met, for example, proposals should “*not result in the over-concentration of specialist housing in a particular locality, leading to a material change in character.*”
- Policy H7 (Affordable Housing) – the headline requirement is that “*... sites of 10 or more residential dwellings, or a site area of 0.5ha and above, will be permitted that deliver 40% affordable housing.*”

Further detailed considerations are also covered by the policy, including in respect of the mix of affordable housing tenures. The following is also an important criterion: “*Viability will only be considered a constraint in exceptional circumstances and where there are significant additional costs not anticipated through the Local Plan process.*” This serves to highlight the importance of giving careful consideration to matters relating to viability through the Local Plan process.

- Policy H8 (Loss of Housing) – notably sets out that: “*Where evidenced by local needs the Council will support the retention of housing designed to meet the needs of the Borough’s older population and people with disabilities, such as single storey homes.*” A blanket presumption is an alternative option.
- Policy H9 (Rural Exception Sites) – is supportive of small scale developments of affordable housing which are outside defined rural settlement boundaries, provided certain criteria are met, including in respect of connectivity, accessibility and settlement/landscape character.
- Policy H10 (First Homes Exception Sites) – is similar to Policy H9, but deals specifically with First Homes exception sites. First Homes exception sites cannot come forward in areas designated as Green Belt.
- Policy H11 (Gypsies, Travellers and Travelling Showpeople) – sets out a policy framework for determining proposals, and also seeks to protect existing Gypsy and Traveller sites, mindful of an identified need for at least 32 pitches for Gypsies and Travellers and 14 plots for Travelling Showpeople meeting the planning definition across the plan period. The GTAA also identified a need for further pitches for Gypsy and Traveller households that did not meet the planning definition.

Conclusion

9.10.11 The Local Plan is predicted to result in **significant positive effects** given a proposed land supply sufficient to meet objectively assessed need, once account is taken of unmet need provided for through the adopted Hart Local Plan. There is also broad support for the distribution and mix of sites (both allocations and smaller sites in the SLAA), from a housing perspective. There are some challenges with the delivery of affordable housing and these will need to be explored through the whole plan viability assessment. Other key considerations relate to Gypsy, Traveller and Travelling Showpeople accommodation needs (there is a need for further work in this respect) and specialist accommodation (the SLAA supports six sites to deliver older persons accommodation).

9.11 Land, soils and resources

9.11.1 Sustainability objectives include:

- Make the best use of previously developed land (PDL) and existing buildings
- Reduce contamination and safeguard soil quality and quantity
- Reduce generation of waste and maximise re-use and recycling

Discussion

9.11.2 The proposed strategy is largely focused on **previously developed land**, and hence performs very well, particularly as the effect would be to minimise loss of productive agricultural land.

- 9.11.3 With regards to the three small SLAA sites in the **Green Belt**, the proposal is to support housing only on the previously developed parts of the site, such that there is no need for Green Belt release.
- 9.11.4 With regards to sites in the CBGB, several sites are greenfield comprising **woodland or forestry**, as discussed above, with none thought to comprise productive agricultural land; whilst others comprise the private grounds/curtilage/gardens of existing homes/buildings in large plots.
- 9.11.5 One site that stands out as being of particular note is **Land east of Benner Lane** (partial Housing Reserve Site), West End (73 homes), as this is a larger greenfield site, and whilst the majority of the site currently comprises woodland/forestry, the nationally available 'provisional' agricultural land quality dataset (which is very low resolution) shows an area of better quality agricultural land in the West End / Bisley area. Specifically, the provisional dataset shows an area of 'grade 3' agricultural land here; however, detailed survey work has also been completed in the vicinity (see the 'post 1988 classification' dataset at www.magic.gov.uk), which indicates the presence of grade 2 agricultural land. The rest of the Borough is shown by the provisional dataset to mostly comprise lower quality land (grade 4 or 5).
- 9.11.6 A final consideration here is loss of **greenspace** within settlement boundaries, whether in the form of sports pitches, accessible greenspace or amenity grassland. Two key sites are:
- Chobham Rugby Club, Windsor Road (Site 447, 91 homes) - the SLAA explains *"there is scope for the retention of green space and possible incorporation of additional green infrastructure on site."*
 - Former Playing Field, Lakeside School Field Lane, Frimley (Site 837, C2 accommodation) - the SLAA explains: *"A workable solution for the green space designation and the TPO trees that bound the site will be required. The capacity for the site has been reduced due to the need to find a workable solution and give consideration for the protected trees that border the site, and this could impact on the viability of the proposed extra care use. A long-term solution for the retention of existing trees and the possibilities to retain and incorporate some of the greenspace within a future scheme would be required."*
- 9.11.7 With regards to **thematic policies**, none give rise to any notable tensions with 'land' objectives, and it is noted that Policy **E2** (Biodiversity and Geodiversity) sets out that: *"Development will be expected to avoid the best and most versatile agricultural land. Areas of lower quality agricultural land should be used for development in preference to the best and most versatile agricultural land."* The key consideration is that BMV agricultural land feeds-into spatial strategy and site selection at the Local Plan-making stage.

Conclusion

- 9.11.8 The plan performs well notably well from a perspective of making good use of previously developed land and avoiding loss of BMV agricultural land. However, several sites are greenfield comprising woodland / forestry or the private grounds/curtilage/gardens of existing buildings in large plots. Overall, **neutral effects** are predicted.

9.12 Landscape

- 9.12.1 Sustainability objectives include:
- Protect and where appropriate enhance the landscape, buildings, sites and features of archaeological, historical or architectural interest and their settings
 - Maintain and enhance the quality of countryside, Green Belt and open space areas

Discussion

- 9.12.2 With regards to **landscape**, a range of relevant considerations have already been explored. The Borough benefits from extensive woodland and forestry, which serves to screen and contain growth locations in the landscape and leads to relatively limited concerns regarding piecemeal expansion or 'sprawl' over time.
- 9.12.3 One proposed allocation that warrants stand-alone consideration is **Land east of Benner Lane** (partial Housing Reserve Site), West End (73 homes), for which the site-specific policy is set to require that proposals *"incorporate a significant landscape buffer along the eastern edge of the site that adjoins the Green Belt, helping to preserve the rural character of the area and providing a soft transitional edge to the developed area."* Providing a landscape buffer of this nature is appropriate where there is confidence in the appropriateness of setting a long-term defensible boundary.

9.12.4 The SLAA supports three small sites in the Green Belt that are less well contained in landscape terms, but the Green Belt designation should serve to ensure that development does not impact on openness, and also negate any risk prevent problematic long term development creep. Focusing on the two small sites in the Green Belt at West End, the sites are in quite close proximity, and both sites are associated with the **Trulley Brook corridor**, however there is no footpath along the brook linking the two sites. Land North of Old House Lane, which is located to the south of the village, appears to have a greater degree of existing built form on parts of the site, although there is possibly a sensitivity relating to the bridleway along the site's southern edge, plus land here falls within the landscape gap between West End and Bisley.

9.12.5 Further sites of note, in respect of landscape sensitivities, are at:

- **Mytchett** - Site 912 (16 homes) appears to be associated with an open river valley landscape, although it is not clear that there are any sensitive public view points into or across the site, and the scheme would be contained by the flood zone; and
- **Bagshot** - there is a collection of small sites along the A30 between Bagshot and Camberley. The proposal is for an intensification of built form in a sensitive part of the countryside between settlements; however, it is noted that a low density is proposed for all three sites (albeit a primary aim is to buffer the railway line, more so than the road). Also, the extent of woodland and SANG in this broad area serves to suggest limited risk of problematic sprawl in the long term.
- **Deepcut** -
 - Site 504 – the SLAA explains that the estimated capacity has been reduced from 11-17 homes to five homes, to account for *“wooded character and low surrounding densities.”*
 - Site 757 – the SLAA explains that the estimated capacity has been reduced from 52 homes to 21 homes, to account for the *“irregular shape, areas of detachment, countryside location [and] group TPO on site.”* The SLAA also explains: *“Much of the site consists of relatively dense, mature woodland.”*
 - Site 887 – the SLAA explains: *“The site currently comprises two dwellings surrounded by significant woodland. The site is 4.32 ha in total. However, an area covering 2ha of the site is indicated as the part of the site that is suitable for development... The woodland strongly contributes to the character and local distinctiveness of the area... The deep woodland belt is characterised by only a few individual residential properties...”* The SLAA then concludes: *“The current proposal is for 60 – 90 units. However, the SLAA capacity for the site is derived from the existing footprint from the development on-site, to ensure that the proposals would be sensitive to the character of the area.”*
 - Site 920 – the SLAA concludes: *“Development of the site at 30dph would provide 95 dwellings. Due to the site's heavily wooded character and location within an area of countryside that provides a gap between settlements, it is considered that capacity would need to be reduced, to retain woodland areas, and reflect the rural character of the locality. Accordingly, titles comprising wholly undeveloped woodland without residences or other buildings are deducted from the total site area, when taking account of capacity calculations... A capacity of 17 dwellings is derived, applying a lower threshold of 10dph to the remaining 1.7ha area, having regard to the rural, densely wooded character of the site.”*
 - Sites 922 and 926 are adjacent to Frimley Green, within the CBGB. The submitted capacity of the two sites is up to 20 homes, but the SLAA identifies capacity for 10 homes mindful of the *“countryside designation, the limited existing built form and small size and surrounding low densities.”*

9.12.6 With regards to **townscape**, as discussed under other topic headings above, there is a considerable focus on matters relating to urban design within the site specific policies. The following bullet points present a selection of site-specific criteria not already discussed above:

- Land East of Park Street, North of Princess Way (120 homes) – proposals must provide *“an enhanced gateway into Camberley Town Centre from Park Street, incorporating an attractive promenade that leads through to The Square Shopping Centre and an attractive link to Princess Square; [and maximise] the corner location to create an attractive, design-led, contemporary urban living environment that takes account of external views from new flatted development [and a range of other issues].”*
- Sir William Siemens Square, Chobham Road, Frimley (200 homes) – proposal are required to *“be sympathetic to and enhance the green, rural character of the neighbouring playing fields.”*
- Pinehurst, 141 Park Road, Camberley (C3 accommodation) – development proposals are required to *“incorporate high-quality landscaping, retaining and enhancing the existing treed character of the site's boundaries, which contributes to local distinctiveness.”*

- 9.12.7 With regards to **thematic policies**, none give rise to any notable tensions with landscape objectives, and several should assist with mitigating growth related issues/impacts and realising benefits, most notably Policy **E7** (Landscape Character), which sets out, amongst other things, that: *“Development proposals will be permitted which respond to and wherever possible enhance the special character, key positive landscape attributes, value and landscape setting of settlements.”*
- 9.12.8 Also of note are Policies GBC1-4, which set out the criteria under which proposals for development in the Green Belt and CBGB will be considered. With regards to GBC4 (Development within the Countryside), the policy might clarify that it applies to windfall schemes and not Local Plan allocations.

Conclusion

- 9.12.9 The proposal to maintain the current extent of the Green Belt, bar the inseting of Chobham village (see discussion in Appendix IV), is supported from a landscape perspective. The corollary is a need to focus growth in the CBGB, and the outcome is a need to support certain sites that potentially give rise to a degree of tension with landscape objectives, notably at Mytchett, Bagshot and Deepcut. However, it is difficult to predict impacts of any significance, given that the landscapes in question are not known to be particularly sensitive, and also given the potential to avoid and mitigate impacts through site layout, landscaping and design. Overall, **neutral effects** are predicted.

9.13 Transport

- 9.13.1 Sustainability objectives include:
- Encourage the use of more sustainable modes of transport (public transport/cycling/ walking) and reduce traffic congestion

Discussion

- 9.13.2 There is much to commend the proposed approach to distribution from a transport perspective, as discussed above under Accessibility and Air quality, although there are also certain tensions, e.g. support for several small sites not adjacent to a settlement boundary.
- 9.13.3 There is limited potential to comment further on matters relating to road / junction capacity at the current time, ahead of modelling work being completed. However, one immediate consideration is the risk of a high growth strategy for the main **urban area** leading to problematic traffic congestion. With regards to parking, the proposal for the two main town centre allocations (1,025 homes in total) is as follows:
- East of Knoll Road - *“... provision in accordance with adopted parking standards, providing adequate public, private and on-street vehicle and cycle parking to meet the needs of residents and visitors”.*
 - London Road Block- *“provide suitable, well integrated parking provision in accordance with adopted parking standards for the proposed land uses, along with provision of adequate public car and cycle parking to serve the wider town centre and to meet the needs of residents and visitors”.*
- 9.13.4 Also within the urban area, the proposal for **York Town Car Park**, Sullivan Road, Camberley (27 homes) is to *“retain and/or re-provide the public car-parking currently on-site”*, and it is also noted that adjacent Site 49 (8 homes) comprises garages.
- 9.13.5 Another key site is clearly **Camberley Station** (75 homes), where the proposal is to *“incorporate a new or improved train station, with associated transport interchange facilities, including car and cycle parking.”* This is also one example of a site specific policy with a clear focus on improving walking and cycling connectivity within the urban area, with the policy requiring:
- *“incorporate high-quality, design-led, public realm and wayfinding improvements for pedestrians and cyclists, improving connectivity to Camberley Town Centre and to both Portesbery Road and Knoll Road. Public realm improvements should focus on improving connectivity, safety, and sense of place.*
 - *improve interconnectivity between Camberley Train Station and the bus stops on Pembroke Broadway, through high-quality urban design, use of hard and soft landscaping, sightlines and signage.”*

- 9.13.6 The other key matter for consideration here is around safe access for cars, larger vehicles, pedestrians and cycling, with the SLAA reporting that a number of sites are associated with issues and potential challenges that will require further investigation, most notably Land at Frimhurst Farm, Deepcut Bridge Road (Site 552; 65 homes), with the SLAA explaining: *“Existing access from Deepcut Bridge Road is at a point where the road reduces to a single lane over a railway bridge, on a slight bend. Consultation with SCC would be required to establish whether it would be appropriate to upgrade the existing access point to the site, and/or whether access could be appropriately provided through establishing an alternative access point in another location.”* One other site seemingly with an access constraint, which has already been discussed above, is Site 834 between Lightwater and Windlesham. There is a footpath along the road to Lightwater, but this is narrow and near non-existent over the bridge crossing the Windle Brook.
- 9.13.7 With regards to **thematic policies**, the primary policy for consideration is Policy IN2 (Transportation) which sets out, amongst other things, supports proposals that are *“located where travel can be minimised and the use of sustainable transport modes is maximised... improve transport capacity and opportunities for travel by rail or bus transport... [and provide] safe, convenient access... for all potential users including those with disabilities, giving priority to walking and cycling routes over vehicular traffic and maximising catchment areas for bus or other public transport services.”*

Conclusion

- 9.13.8 The proposed strategy reflects the hierarchy of settlements/centres with a particular focus on Camberley town centre, which leads to strong performance in terms of transport objectives. Also, there is a clear focus within site specific policy on taking targeted steps to ensure permeability within and through sites and improving walking and cycling links within the main urban area. Transport/traffic modelling is required to assess the capacity of roads and junctions to accommodate the increased traffic that will result from the growth strategy, and there is also a need for further work to confirm the potential for safe access to be achieved at certain sites. Overall, **‘positive effects of limited or uncertain significance’** are predicted.

9.14 Water

- 9.14.1 Sustainability objectives include:
- Maintain and improve the quality of water resources
 - Encourage reduced water consumption

Discussion

- 9.14.2 Perhaps a primary consideration is in respect of capacity at wastewater treatment works (WwTWs). There is often good potential to deliver capacity increases in support of growth; however, this can be costly and lead to delays, and there can be residual risk of capacity being breached leading to pollution of waterways, hence it is preferable to direct growth to locations with existing capacity. Matters were explored through a Water Cycle Study (WCS) for Hart, Rushmoor and Surrey Heath councils in 2017. The study explores housing growth under various scenarios that do not necessarily relate to the current Draft Local Plan; however, the study does highlight Chobham WwTW as having greater capacity to accept additional flows than is the case for the other two WwTWs in the Borough (Camberley and Lightwater).
- 9.14.3 Moving forward, there will be a need to confirm that the growth strategy for Camberley does not give rise to any issues in respect of WwTW capacity.
- 9.14.4 Aside from WwTW capacity, other issues relate to pollution to surface waters and groundwaters and supporting water efficiency / minimising pressure on potable water resources. These issues are typically a matter for development management, more so than spatial strategy and site selection, hence there is a need to closely consider:
- Policy **E6** (Flood Risk and Sustainable Drainage) – currently includes a focus on flood risk but might be expanded to reflect wider sustainable drainage objectives, including in respect of water quality.
 - Policy **DH4** (Sustainable Water Use) – all new homes are required to meet the water efficiency standard of 110 litres per person per day, to be achieved through compliance with the Building Regulations. As discussed in Section 6, there can be the potential to achieve higher standards.

- 9.14.5 There is also a notable focus on certain ‘water’ related matters within the site-specific policies for the two strategic sites in Camberley town centre. For example, Policy HA2 (London Road Block) requires *“appropriate rainwater management through SuDs integrated with landscape design to visually and environmentally enhance the public and private realm.”*

Conclusion

- 9.14.6 It is appropriate to flag ‘**negative effects of limited or uncertain significance**’ ahead of formal consultation with the statutory providers, including in respect of WwTW capacity at Camberley, and the Environment Agency may also wish to comment further on requirements in respect of SuDS, both site specific and borough-wide.

9.15 Conclusions on the Draft Local Plan

- 9.15.1 In conclusion, the appraisal predicts: **significant positive effects** in respect of housing objectives; **moderate or uncertain positive effects** in respect of accessibility, communities, ‘economy and employment’ and transport objectives; **neutral effects** in respect of air quality, climate change mitigation, historic environment, ‘land, soils and resources’ and landscape objectives; and **notable tensions / risk of negative effects** in terms of biodiversity, climate change adaptation and water objectives. Significant negative effects are not predicted under any of the topic headings.
- 9.15.2 Impacts and wider issues/opportunities discussed within this appraisal will be taken into account prior to plan finalisation. A number of specific recommendations are also made within Section 9 of the main report, which will be given consideration, including around the possibility of additional site specific policy.
- 9.15.3 It is also important to note that early drafts of this draft plan appraisal have been taken into account as part of the process of preparing the draft plan for consultation. As part of this, the appraisal above notes two instances of specific recommendations having been made as part of early appraisal iterations that have now been actioned (see paragraphs 9.3.2 and 9.4.7). There is no requirement for SA to be iterative in this way, but it is a means of demonstrating a robust and sound plan-making process.

Cumulative effects

- 9.15.4 The SEA Regulations, which underpin the SA process, indicate that stand-alone consideration should be given to ‘cumulative effects’, i.e. effects of the Local Plan in combination with other plans, programmes and projects that can be reasonably foreseen. In practice, this is an opportunity to discuss potential ‘larger than local’ effects. The following bullet points cover some key considerations:
- **Housing needs** – the proposed strategy involves unmet needs from Surrey Heath provided for within Hart District, and does not make any provision for the risk of unmet needs arising from elsewhere in the sub-region. However, this is an appropriate strategy because: A) the matter of unmet needs provision in Hart is agreed and set out in an adopted Local Plan, such that it does not need to be revisited at the current time; and B) the environmental constraints affecting Surrey Heath mean that the Borough is not suited to providing for unmet needs from Woking or elsewhere in Surrey, plus there is a need to recognise that Surrey Heath shares a housing market area with the North East Hampshire / Blackwater Valley authorities to the southwest (from where there is little or no risk of unmet needs arising). Work has been undertaken to appraise higher growth scenarios (Section 6), but only because of the need to explore the possibility of providing for locally arising affordable housing needs more fully and/or providing for a larger ‘supply buffer’ over-and-above the housing requirement. At the current time, on the basis of the discussion presented in Section 5, any scenario that would seek to reduce the unmet need figure and/or provide flexibility to reflect the risk of unmet needs arising from elsewhere, which would necessitate release of land from the Green Belt, is considered to be unreasonable.
 - **The economy** – the proposed strategy does not make provision for new employment land, beyond a mixed used strategic scheme within Camberley town centre, and does support the redevelopment of several employment sites for residential, primarily in the Camberley/Frimley urban area, and most notably Sir William Siemens Square. The primary ‘larger-than-local’ consideration is the need to support the economy of the Blackwater Valley, and regeneration of Camberley town centre is supported in this respect, as is the proposed protection for strategic employment sites. Transport modelling will need to feed-in, and the views of the Enterprise M3 LEP are sought through the current consultation.
 - **MOD operations** – this is a clear ‘larger-than-local’ consideration. The appraisal does not highlight any issues or risks, but the views of the MOD are sought through the current consultation.

- **Transport corridors** – the appraisal does not highlight any major growth-related issues or opportunities, but there will be a need to revisit matters subsequent to the current consultation, in light of modelling and responses received key stakeholder organisations including National Highways, Transport for the South East and both Surrey and Hampshire county councils. Key corridors include those road corridors that link Woking to the M3 and the M25, the M3 itself and the regionally important A331 corridor.
- **Thames Basin Heath SPA** – the matter of in-combination impacts to the SPA is a focus of a stand-alone Habitats Regulations Assessment (HRA), noting that eleven authorities manage the SPA in partnership. Key considerations include management of Horsell Common in collaboration with Woking Borough, and Chobham Common in collaboration with Runnymede District and RB Windsor and Maidenhead.
- **Landscape scale nature recovery** – there is a need to focus efforts on achieving conservation and ‘net gain’ objectives, in respect of biodiversity and wider natural capital and ecosystem services, at functional landscape scales, including landscape character areas and river corridors. A Local Nature Recovery Strategy (LNRS) will be forthcoming, under the Environment Act, but steps must be taken in the interim. Aside from matters relating to the TBHSPA and its associated heathland and former heathland landscapes, a primary consideration is potentially realisation of opportunities along the Blackwater Valley corridor in collaboration with Rushmoor Borough and Guildford Borough and other partner organisations. Views on constraints and growth-related opportunities are sought from biodiversity, nature-recovery and natural capital-focused organisations including Surrey Nature Partnership.

Figure 9.3: Surrey Heath within Surrey but linking closely to Berkshire and Hampshire

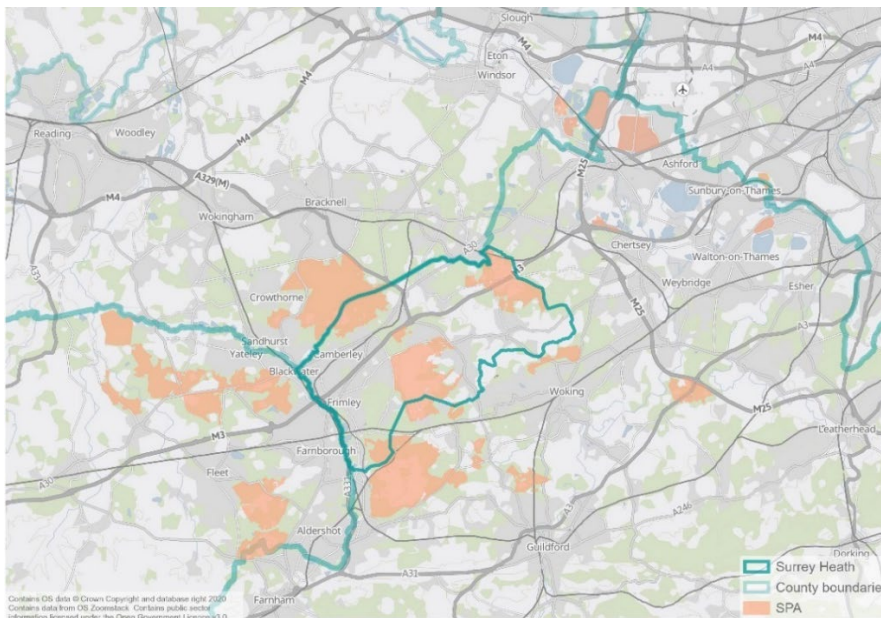


Figure 9.4: Camberley town centre – an important centre in the sub-region



Part 3: What are the next steps?

10 Plan finalisation

Publication of the Proposed Submission Local Plan

- 10.1.1 Subsequent to the current consultation it is the intention to prepare the proposed submission version of the Local Plan for publication in-line with Regulation 19 of the Local Planning Regulations 2012. This will be a version that the Council believes is 'sound' and intends to submit for Examination. Preparation of the Proposed Submission Local Plan will be informed by the findings of this Interim SA Report, responses to the current consultation, further evidence gathering and further appraisal work.
- 10.1.2 The SA Report will be published alongside the Proposed Submission Local Plan. It will provide all the information required by the SEA Regulations 2004.

Submission, examination and adoption

- 10.1.3 Once the period for representations on the Proposed Submission Local Plan / SA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed 'sound'. If this is the case, the plan will be submitted for Examination, alongside a summary of the main issues raised during the consultation. The Council will also submit the SA Report.
- 10.1.4 At Examination, the Inspector will consider representations (alongside the SA Report) before then either reporting back on soundness or identifying the need for modifications. If the Inspector identifies the need for modifications to the Local Plan, these will be prepared (alongside SA if necessary) and then subjected to consultation (with an SA Report Addendum published alongside if necessary).
- 10.1.5 Once found to be 'sound' the Local Plan will be adopted by the Council. At that time a 'Statement' must be published that sets out certain information including 'the measures decided concerning monitoring'.

11 Monitoring

- 11.1.1 At the current time, in-light of the appraisal findings presented in Part 2 (i.e. predicted effects and uncertainties), it is suggested that monitoring efforts might focus on:
- Agricultural land – it is possible to monitor loss of agricultural land by grade.
 - Air quality – the Council might review how air quality monitoring efforts are targeted in light of the Local Plan, including with a view to identifying problem areas outside of formally designated AQMAs, including potentially ecology-related.
 - Biodiversity – there will be a need to develop a framework for ensuring that individual developments deliver biodiversity net gain in combination at landscape scales.
 - Climate change adaptation –potentially monitor housing in close proximity to a fluvial flood zone (in addition to intersecting); also the 1 in 30 yr surface water flood zone.
 - Climate change mitigation – there is a need to carefully consider how Local Plan monitoring links to wider monitoring of borough-wide emissions. On a specific point, it could be appropriate to monitor the proportion of new homes linked to a heat network (e.g. district-level); also the proportion of homes delivered to standards of sustainable design and construction that exceed building regulations.
 - Employment land requirements – will require close monitoring, given that the current employment land evidence bases is now nearly two years old, and the regional and national economic context and baseline situation has evolved since that time.
 - Housing – the Council already monitors numerous housing delivery related matters through the Authority Monitoring Report, and indicators should be kept under review.
 - Transport – in Camberley town centre there will be merit to monitoring the travel behaviours of residents in detail, in order to test the hypothesis that per capita emissions from transport can be minimised at major growth locations.
 - Water – ongoing consideration should be given to any risk of capacity breaches at WwTWs and other risks to the status of water courses.

Appendix I: Regulatory requirements

As discussed in Section 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report. However, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2, whilst Table B explains this interpretation. Table C then presents a discussion of more precisely how the information in this report reflects the requirements.

Table A: Questions answered by this SA Report, in-line with an interpretation of regulatory requirements

		Questions answered	As per regulations... the SA Report must include...
Introduction		What's the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
		What's the sustainability 'context'?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What's the SA scope?	What's the sustainability 'baseline'?	<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SA involved up to this point?		<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2	What are the SA findings at this current stage?		<ul style="list-style-type: none"> The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
Part 3	What happens next?		<ul style="list-style-type: none"> A description of the monitoring measures envisaged

Table B: Interpreting Schedule 2 and linking the interpretation to our report structure

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
The report must include...	The report must include...	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level	
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal	i.e. answer - <i>What are the key issues & objectives?</i>
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

Table C: 'Checklist' of how and where (within this report) regulatory requirements are reflected.

Regulatory requirement	Information presented in this report
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 ('What's the plan seeking to achieve') presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report. The outcome of scoping was an 'SA framework', which is presented within Section 3 in an adjusted form.
c) The environmental characteristics of areas likely to be significantly affected;	Key issues and objectives are also presented within Appendix II.
d) ... environmental problems which are relevant... ...areas of a particular environmental importance...;	
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The Scoping Report presented a detailed context review and explained how key messages from this (and baseline review) were then refined in order to establish an 'SA framework', which is presented within Section 3. Also, key issues and objectives are discussed in Appendix II. With regards to explaining " <i>how... considerations have been taken into account</i> ", Section 7 explains 'reasons for supporting the preferred approach', i.e. how/why the preferred approach is justified in-light of alternatives appraisal.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Section 6 presents alternatives appraisal findings in respect of reasonable growth scenarios, whilst Section 9 presents an appraisal of the Local Plan as a whole. All appraisal work naturally involved giving consideration to the SA scope and the potential for various effect characteristics/dimensions.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Section 9 presents recommendations.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 4 and 5 deal with 'reasons for selecting the alternatives dealt with', with an explanation of reasons for focusing on growth scenarios / certain growth scenarios. Section 7 explains 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of the alternatives (growth scenarios) appraisal. Methodology is discussed at various places, ahead of presenting appraisal findings.
i) ... measures envisaged concerning monitoring;	Section 11 presents this information.
j) a non-technical summary... under the above headings	The NTS is a separate document.
The SA Report must be published alongside the draft plan, in-line with the following regulations	
Authorities... and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	This Interim SA Report is published alongside the Draft Plan in order to inform consultation and plan finalisation.
The SA Report must be taken into account, alongside consultation responses, when finalising the plan.	
The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	This ISA Report will be taken into account when finalising the plan for publication (as discussed in Section 10).

Appendix II: The SA scope

Introduction

The aim here is to update the baseline review presented in Section 2 of the 2018 Interim SA Report, which is available at: surreyheath.gov.uk/residents/planning/planning-policy/draft-local-plan-2016-2032. The review is presented under the same series of headings as the equivalent review from 2018.

N.B. some of the information presented below has limited implications for the SA process given the scope of the emerging Local Plan and reasonable alternatives, but is included for completeness. Tailored discussion of the sustainability context and baseline is presented across the main body of this report.

Biodiversity

The Borough of Surrey Heath contains five Sites of Special Scientific Interest (SSSI), four of which are also internationally designated as Special Protection Area (SPA) and/or Special Area of Conservation (SAC) and one National Nature Reserve at Chobham Common, the largest in Southeast England, covering 574.3ha. There are also numerous locally designated sites such as Sites of Nature Conservation Importance (SNCI) and two Local Nature Reserves.

Specifically, the SPA/SAC has been designated for supporting heathland habitat which in turn supports three species of ground nesting birds, the Dartford Warbler, Woodlark and Nightjar. All three species are protected under the Birds Directive (2009/147/EC). The areas of heathland habitat are designated by the Habitats Directive (92/43/EEC, as amended) and the Birds Directive (2009/147/EC) and form part of the wider Thames Basin Heaths Special Protection Area (SPA) which includes elements of the Thursley, Ash, Pirbright and Chobham Common Special Area of Conservation (SAC). The whole of Surrey Heath lies within 5km of the Thames Basin Heaths SPA. Together SPA and SAC sites form the Natura 2000 Europe-wide network of nature protected areas.

Advice from Natural England is that development for net additional dwellings within 5km of the SPA is likely to lead to increased recreational pressure arising from increased population. The increase in recreational pressure is likely to lead to significant effects on the SPA and as such development should not be permitted without any form of avoidance measures. Furthermore, Natural England considers that there are no avoidance measures capable of accommodating net additional dwellings within 400m of the SPA due to urbanising impacts although other forms of development can be permitted. Consequently, a 400m buffer zone has been designated around the perimeter of the SPA, where no additional residential units will be permitted.

In order to accommodate residential development within a 5km zone around the SPA (but outside 400m) Natural England working with local authorities affected by the SPA has produced The Thames Basin Heaths Delivery Framework. The Framework sets out the mechanism to avoid adverse impact to the SPA. This includes the provision of Suitable Alternative Natural Greenspace (SANG) to act as land for general recreation to divert people away from the SPA. In addition to SANG, a Strategic Access Management & Monitoring (SAMM) project has been introduced which puts into place SPA wide monitoring and management.

Surrey Heath Borough Council adopted the Thames Basin Heaths SPA Avoidance Strategy Supplementary Planning Document in January 2012. This document provides general guidance on the Council's approach to avoidance of likely significant effect on the Thames Basin Heaths SPA arising from new development. Principally, it underpins the approach pursued by Surrey Heath in order to allocate SANG to residential development as well as the sustained implementation of a 400m buffer zone and collection of SAMM monies.

There is one SSSI, namely Basingstoke Canal that falls partly within Surrey Heath, but does not form part of the Thames Basin Heaths SPA (or Thursley, Ash, Pirbright & Chobham Common SAC). Figure A shows the locations of international and national ecological designations in Surrey Heath, including SAC, SPA, SSSIs and National Nature Reserves. Table A overleaf shows the summary percentage of SSSI units meeting area of favourable or unfavourable recovering condition. The trend is generally positive, with over 99% of 4 of the 5 sites meeting favourable or unfavourable recovering condition.

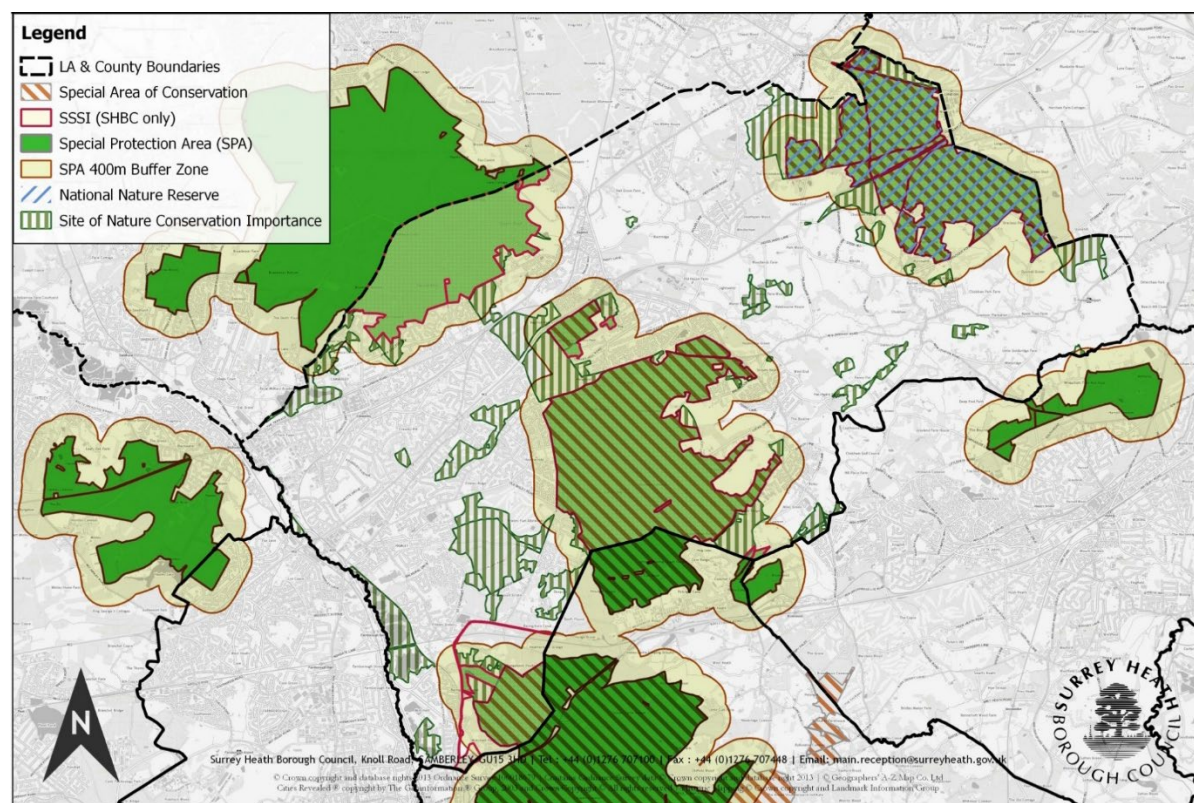
Table A. Condition status of SSSI summary units

SSSI	% meeting area of favourable or unfavourable recovering	
	Area	Percentage (%)
Broadmoor to Bagshot Woods & Heaths	1,687.05	99.45%
Colony Bog to Bagshot Heath	1,122.98	99.33%
Ash to Brookwood Heaths	1,561.04	99.03%
Chobham Common	655.73	100.00%
Basingstoke Canal	27.38	27.03%

Other protected species in Surrey Heath include badgers, dormice, great crested newts, natterjack toads and smooth snakes. Nationally and Internationally important species include: hobby, stonechat, sand lizard, marsh club-moss, swan-neck moss, marsh fern and *Oxyopes heterophtalamus* (a heathland spider). Green and blue infrastructure and waterbodies within the Borough provide opportunities to create coherent ecological networks.

The Borough also contains a number of locally designated sites such as Sites of Nature Conservation Importance (SNCIs). All 56 SNCIs in Surrey Heath were assessed in 2011/12 and it was determined that 51% (28 sites) were in favourable condition. This falls significantly short of the Borough target of 100%. However a trend cannot be identified at this time, as the condition of SNCIs in Surrey Heath had not previously been recorded. There are two further local designations, namely Brentmoor Heath and Bisley & West End Common Local Nature Reserves covering areas of 59ha and 55.5ha respectively.

Figure A: Biodiversity designations in Surrey Heath



Trends

The general trend is an improving condition for areas of biodiversity importance both at International and national level. A general improving trend is likely to continue into the future as better management regimes are implemented. The area of sites covered by international, national and local designations is not expected to change significantly.

The issue of an increasing population is likely to continue to place pressure on designated sites. Therefore the need to protect internationally designated sites and the securing of avoidance measures is an issue likely to continue into the future. Problems identified include only 27% of the Basingstoke Canal SSSI being in a favourable

or unfavourable/recovering condition. The Basingstoke Canal SSSI may improve over time with potential water recharge from the development at the Princess Royal Barracks but this is uncertain.

In terms of locally designated sites, the overall proportion of the Borough's 56 SNCIs in favourable condition is relatively low at 51% compared to the ambitious target to retain 100% in favourable condition. However it is recognised that the situation may have changed somewhat since 2011/12. In many cases, SNCIs are not in the Council's ownership and consequently, the extent and speed to which such habitats can be restored to a favourable condition relies largely on the actions of landowners. It is therefore uncertain how quickly their condition will improve and difficult to anticipate a future trend.

Key issues

Issue	Source	How might the Local Plan address this?
Persistent recreational pressure on SPA leading to deterioration and/or fragmentation of habitat including SSSI units.	Baseline Information Thames Basin Heaths Delivery Framework Natural England Commissioned Visitor Surveys of SPA	Policy should continue to ensure all net additional residential development will require SPA avoidance measures in the form of SANG and make contribution toward SAMM. The overarching approach to SANG & SAMM should be consistent with Natural England's Thames Basin Heaths Delivery Framework, the Borough's adopted Community Infrastructure Levy SPD and Thames Basin Heaths SPA Avoidance Strategy subject to any future amendments.
Condition Status of Basingstoke Canal SSSI units	Baseline Information from Natural England and the AMR	There is one SSSI unit that is not also SPA/SAC designated, namely, the Basingstoke Canal. The condition of the Basingstoke Canal is primarily a land management issue. The extent and speed to which such a habitat can be restored to a favourable position is uncertain and relies largely on Natural England working with landowners.
Condition status of SNCI uncertain	Baseline Information from Surrey Wildlife Trust surveys	The survey work last undertaken in 2011/12 proposed some minor amendments to site boundaries which have not yet been implemented. However no further surveys of the SNCIs have been undertaken since this date and it therefore may not accurately reflect the current situation. It would therefore be necessary to commission a future survey in order for the results to be accurate in informing future Local Plan policies.

Population

The baseline population of the Borough currently stands at 89,204.²⁷ (mid 2020 estimates), which is an 0.9% increase from 85,843 mid 2010. This is considerably lower than the percentage increase seen for England 2010 – 2020 (7.42%).²⁸

Based on 2011 Census data, the age structure of the Borough's population is set out in Table B overleaf. Compared to the South East and England, Surrey Heath has a slightly lower percentage of people aged under 30. The Borough has the same percentage of people aged over 65 as England at 16.7%, which is slightly lower than the figure of 17.1% for the South East of England. This is higher than the figure of 13% of people aged over 65 recorded in Surrey Heath in the Census 2001, which goes some way toward demonstrating that the Borough contains an ageing population. The mean age of the population in Surrey Heath is 40.2 which is slightly older than both the South East of England and England.

²⁷ ONS 2020 mid year population estimates

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

²⁸ Ibid.

The Surrey Heath Place-Based Profile (2017) population projection predicts a small increase in the number of young children and those of working age.²⁹ The population aged 65 and over is projected to go up from 18,500 in 2017 to 22,800 in 2027. There are significant predicted increases in those aged over 85 years with numbers predicted to increase by more than 40% in the next 10 years, compared to around 30% for Surrey as a whole. The population aged 65 and over is projected to go up from 18,500 in 2017 to 22,800 in 2027.

In terms of ethnicity, Surrey in general is not as ethnically diverse as the rest of England. In Surrey Heath CCG, 9.3% of the population are from a non-white ethnic background.³⁰ There are an estimated 128 Gypsy, Roma, and travellers residing in 32 pitches across six traveller sites in Surrey Heath. This group has significantly poorer health than any other disadvantaged UK residents. Around 3% of the population are likely to be Nepalese who have higher rates of diabetes and coronary heart disease than the general population. This population tends to live around the Frimley area.

Table B: Age Breakdown of Population by Number and (%)³¹

Age Range	Surrey Heath	South East	England
Age 0 to 4	5,129 (6%)	534,235 (6.2%)	3,318,449 (6.3%)
Age 5 to 7	3,145 (3.7%)	299,327 (3.5%)	1,827,610 (3.4%)
Age 8 to 9	2,008 (2.3%)	188,731 (2.2%)	1,145,022 (2.2%)
Age 10 to 14	5,464 (6.3%)	512,875 (5.9%)	3,080,929 (5.8%)
Age 15	1,096 (1.3%)	106,916 (1.2%)	650,826 (1.2%)
Age 16 to 17	2,288 (2.7%)	217,612 (2.5%)	1,314,124 (2.5%)
Age 18 to 19	1,747 (2%)	217,156 (2.5%)	1,375,315 (2.6%)
Age 20 to 24	4,207 (4.9%)	534,287 (6.2%)	3,595,321 (6.8%)
Age 25 to 29	4,581 (5.3%)	528,057 (6.1%)	3,650,881 (6.9%)
Age 30 to 44	18,306 (21.3%)	1,761,278 (20.4%)	10,944,271 (20.6%)
Age 45 to 59	18,481 (21.5%)	1,716,857 (19.9%)	10,276,902 (19.4%)
Age 60 to 64	5,287 (6.1%)	535,399 (6.2%)	3,172,277 (6%)
Age 65 to 74	7,668 (8.9%)	763,695 (8.8%)	4,552,283 (8.6%)
Age 75 to 84	4,909 (5.7%)	501,118 (5.8%)	2,928,118 (5.5%)
Age 85 to 89	1,182 (1.4%)	139,576 (1.6%)	776,311 (1.5%)
Age 90 and Over	646 (0.7%)	77,631 (0.9%)	403,817 (0.8%)
Total	86,144	8,634,750	53,012,456
Mean Age (Years)	40.2	40	39.3

Indices of Multiple Deprivation (IMD) provide an indication of deprivation levels for a number of topic areas including health, employment etc. and give an overall score derived from these indicators. Combined IMD scores for 2015 showed that Surrey Heath was ranked 285 of 326 Local Authorities, which has fallen from 324 in 2010. There are pockets of relative deprivation in certain areas of the Borough such as Old Dean and York Town in Camberley, as illustrated in the Lower Super Output Areas' (LSOAs) IMD scores and rankings. Indeed, two LSOAs, one in Old Dean ward and one in St Michaels ward were ranked in the 30% most deprived areas nationally.

In the IMD 2019, Surrey Heath is ranked as 9th least deprived local authority (ranked at 309 of 317), which is an improvement since 2015, but is still more deprived than in 2010³². However, this masks pockets of much higher levels of relative deprivation across the Borough particularly but not solely, relating to the Education, Skills and Training indicator³³.

The figure below shows the IMD rankings for Surrey Heath in 2015. IMD 2019 can be seen [here](#).

²⁹ <https://www.surreyi.gov.uk/health-profiles/surrey-heath/#header-conclusion>.

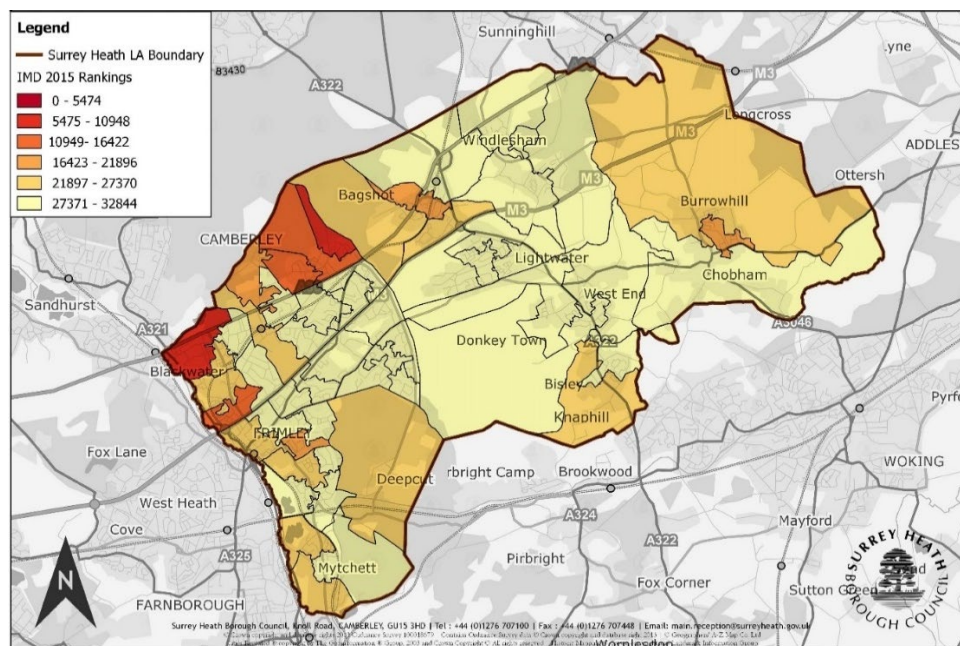
³⁰ Ibid.

³¹ Ibid.

³² Against average ranking.

³³ Available online at: www.gov.uk/government/statistics/english-indices-of-deprivation-2019.

Figure B. IMD Distribution for Lower Super Output Areas in Surrey Heath (2015 Rankings)



Trends

The positioning of Surrey Heath in the 2015 IMD has fallen 39 places below its rank in the 2010 IMD, but has since increased in its rank in 2019 (ranked at 309 of 317). This demonstrates an overall slight increase in deprivation, relative to the 325 other Local Authorities measured in England. However, since 2015, deprivation has improved considerably. It is considered that Surrey Heath will continue to be an area of low deprivation but with small pockets remaining, particularly in the largest settlement of Camberley.

The population profile of Surrey Heath is likely to remain relatively static but, along with national and local trends, continue an inclination toward an ageing profile, with more people over 65 and less under 30. Surrey Heath’s profile is ageing at a faster pace than the county wide rate. This is likely to be reflected in future age profiles.

An increasing population is likely to require additional housing and infrastructure, and place pressure on existing services and facilities. An ageing population may require bespoke services and housing needs and lead to new employment opportunities being filled by people from outside of the Borough, resulting in increased in-commuting and associated issues with congestion and transport infrastructure. This is unlikely to be off-set by a rise in the pensionable age.

Key issues

Issue	Source	How might the Local Plan address this?
Increasing population likely to require additional housing and related infrastructure	Baseline Information	The Objectively Assessed Housing Need will be assessed alongside other evidence to determine the Local Plan’s housing targets, but will need to ensure no significant effect on SPA.
Ageing population may require bespoke services and housing needs	Baseline information	Future policy should recognise the need for housing an ageing population and/or those with specialised needs.
Reduction in working age population and a consistent demand for industrial accommodation may result in increased in-commuting which is unlikely to be off-set by increase in pension age.	Baseline information	Policies should require preferred development locations to be situated near existing infrastructure
Enabling a high quality of life for all residents in the Borough, where the overall affluence can mask areas of deprivation. Notably LSOAs within Camberley are particularly deprived areas nationally.	Baseline information and IMD 2015-19	Policies should encourage a mix of uses and enable opportunities for community development and cohesion across the Borough. Necessary infrastructure to support development will also need to be delivered.

Human health

Overall Surrey Heath is an affluent area with good health outcomes and relatively low rates of many conditions and unhealthy behaviours. The average life expectancy at birth³⁴ for both men and women in Surrey Heath (82.2 and 84.8 years respectively) is similar to the Surrey average (81.8 and 85.0 years respectively). There is a considerable variation in both male and female life expectancy in different parts of Surrey Heath. years) can expect to live more than a full decade compared to those born in Old Dean (80.2 years).

The Surrey Heath Place Based profile 2017³⁵ published by Surrey County Council highlights that there is a difference of 9.2 years in LE at birth for men born in Windlesham (85 years) compared to those born in St. Pauls (75.8 years). There is a bigger difference in life expectancy for women compared to men. Women born in Mytchett and Deepcut (89.4 years) can expect to live more than a full decade compared to those born in Old Dean (80.2 years).

The Place Based profile (2017) highlights key issues relating to health as including; health inequalities, the growing population of those aged over 65, and in particular the increase in those aged over 85, access to services for those without a car and significant proportions of people estimated to have long term conditions who remain undiagnosed.

The overall health of residents has been measured in the Census 2011. Surrey Heath contains a relatively healthy resident population, with 86.8% of the Borough's residents in either good or very good health, compared to 83.6% and 81.4% of the population of the South East and England respectively. Furthermore, there are fewer residents in bad or very bad health in Surrey Heath at 3.2% compared to 4.4% in the South East and 5.4% in England.

The Place Based profile shows around 18.7 % (560) of children in reception year and 27.4 % (714) of children in year 6 in Surrey Heath are classified as overweight or obese. These percentages are lower compared with England (22.2% for reception and 33.4% for year 6) but similar to those for Surrey overall (2012/13-2014/15).

The Place Based Profile monitors indicators for 'Disease Prevalence: the major causes of illness and death', and finds that cardiovascular disease, cancer and respiratory disease are the top three contributing conditions to the life expectancy gap between the most and least deprived populations within Surrey. Long term conditions and their effective management is widely recognised to be one of the greatest challenges facing the NHS and Social Care. Long term conditions can affect many parts of a person's life, from their ability to work and have relationships to housing and education opportunities.

Health benefits can come from the provision of open space and leisure facilities. The Surrey Heath Open Space Study 2016 outlines the quantity of different types of open space provision in the Borough. One of the conclusions of the Study was the need to provide improved provision for young people and older people.

The Borough has a new leisure centre in Camberley which opened in 2021. A range of formal and informal open spaces and playing pitches exist across the Borough and there are two country parks in Frimley Green and Lightwater. The Borough also contains a number of new or improved areas of open space providing mitigation for the impact of new development on the Thames Basin Heaths Special Protection Area. Known as Suitable Alternative Natural Greenspaces (SANG), these include Chobham Water Meadows, St Catherine's SANG and Windlemere SANG.

There are several areas of Surrey Heath where people are deemed to have poor access to health services (particularly in the north and the south). This lack of access is particularly relevant in the rural areas. When commissioning services it might be necessary to consider how services are adapted to improve access for those who need them most.

Trends

It is considered that low levels of health deprivation will remain into the future and life expectancy will continue to follow an overall rising trend, mirroring trends nationally, albeit with the potential for some anomaly years to occur in either male or female life expectancy.

Increased life expectancy brings with it potential issues and problems of limiting long term illness which has implications for quality of life and available health services. This could be tempered by the Borough benefitting from open space and leisure provision, more of which may be implemented over time.

³⁴ Available online at: www.localhealth.org.uk/#bbox=479858,168432,26849,15897&c=indicator&i=t4.le_f_v&view=map10.

³⁵ Available online at: <https://www.surreyi.gov.uk/health-profiles/surrey-heath/#header-conclusion>.

Key issues

Issue	Source	How might the Local Plan address this?
Increased life expectancy increases pressure on health services	Baseline Information	Policy should encourage any large scale future development to be self-sustaining with suitable infrastructure delivery to cater for the increasing and ageing population of the Borough.

Economy & employment

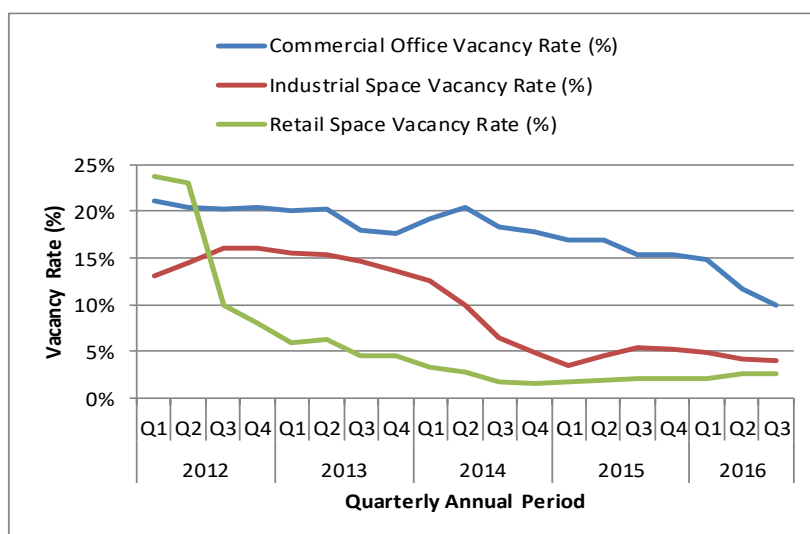
Surrey Heath has a diverse economic base, with businesses ranging from international organisations to small and medium sized local enterprises. The Borough contains businesses across a broad range of sectors including: Merrill Lynch, Frazer Nash (Chobham), Novartis, and Unisys. Frimley Park Hospital, which is rated 'outstanding', is the Borough's largest employer. The Sandhurst Royal Military Academy is also partly located within the Borough.

The majority of employment floorspace is located in Camberley and Frimley at three large business parks and five industrial estates that make a significant contribution to the employment land supply. There are also four single occupancy sites housing major businesses; one located in Frimley, one near Mytchett, and two near the rural settlement of Windlesham. Fair Oaks Airport in Chobham provides employment use within the local area.

Recent figures show that despite Covid-19 the local economy is relatively stable, with comparatively low levels of unemployment and high rates of business formation, particularly small businesses. The Borough's traditional manufacturing industries have largely been replaced since the mid-1990s by information and technology based industries that benefit from strong linkages to the Thames Valley. These include the businesses in Watchmoor Business Park, which forms part of a larger business cluster based in and around the Blackwater Valley towns. However, compared to most other towns within the EM3 LEP Camberley has relatively high industrial floorspace .

There has been a slight decline in office floorspace in the last 15 years. Data from CoStar UK Ltd (November 2016) recorded that the Borough had an office vacancy rate of 9.8% recorded in November 2016, as demonstrated in Figure C. This has fallen considerably over the past 5 years. The Borough's industrial vacancy rate is 4.1% (November 2016) and has also reduced considerably over a 5 year period. The office and industrial vacancy rates recorded for the South East of England are 7.8% and 3.8% respectively (November 2016), demonstrating that Surrey Heath has slightly higher vacancy rates than the regional averages. However, Surrey Heath's vacancy rates have reduced more rapidly than the regional averages, over the past 5 years, and overall there has been an increase across the Functional Economic Area of Hart, Rushmoor and Surrey Heath. Losses include the conversion of offices to residential uses through permitted development rights.

Figure C. Office, Industrial & Retail Vacancy Rates in Surrey Heath from 2012-2016



Trends

It is considered that low levels of both income and employment deprivation will continue into the future given the relative buoyancy of the local economy, access to larger employment centres such as London and Reading, and low unemployment in comparison with the national picture.

Surrey Heath has a diverse economic base which is likely to continue, with office vacancy rates in Surrey Heath falling in the past few years. Although overall there has been an increase across the Functional Economic Area of Hart, Rushmoor and Surrey Heath, for example Camberley has a significant level of industrial floorspace which is likely to continue.

Key issues

Issue	Source	How might the Local Plan address this?
Borough office vacancy rates	Baseline Information Employment Land Review 2015	Future Policy should seek to protect Core Employment Areas / Strategic Employment Sites. However, where employment sites no longer meet the requirements of their occupiers, have high vacancy rates or have been eroded by other non-employment uses, boundary changes may be required and in some cases the sites will not be allocated.
Maintain low level of vacancies in District and Local Centres, with a balance of uses	Baseline information	It is important that policy continues to protect District and Local centres. An updated Retail Study should review primary and secondary frontages and local shopping parades and modify where necessary to ensure continued viability of centres.

Transport

Government Policy recognises the need to reduce congestion on the highway network and to encourage other, more sustainable forms of transport including walking and cycling. Table C shows the key mode of transport within the Borough is the private car which is used for 70% of Surrey Heath resident's travel to work patterns. Meanwhile, public transport, including walking and cycling contribute to 17% of travel to work patterns³⁶. The percentage of Surrey Heath residents using a car or van to travel to work is considerably higher than both the South East and England averages. Bus patronage, cycling and walking are lower than the South East and England averages.

A higher than average proportion of residents in Surrey Heath work from home and the proportion of residents commuting by train is higher than the England average but lower than the South East. Consequently, car ownership in Surrey Heath is high with 90% of households owning at least 1 car or van. This is higher than the South East and England averages of 81% and 74% respectively.

Table C. Census 2011 - Travel to Work Patterns (% of population aged 16-74 excluding non-working)

Method of Travel to Work (Resident Population)	Surrey Heath	South East	England
Work mainly at or from home	8%	7%	5%
Underground, metro, light rail or tram	0%	0%	4%
Train	6%	7%	5%
Bus, minibus or coach	2%	4%	7%
Taxi or minicab	0%	0%	1%
Driving a car or van	70%	61%	57%
Passenger in a car or van	4%	5%	5%
Motorcycle, scooter or moped	1%	1%	1%
Bicycle	2%	3%	3%
On foot	7%	11%	11%

³⁶ Census 2011

The Borough is well connected by road to a number of strategic transport routes linking to London and the south coast. The M3 motorway stretching from London to Southampton crosses through the Borough from east to west and abuts the settlements of Camberley, Frimley, Bagshot and Lightwater. Other major highways which run through the Borough include the A331 Blackwater Relief Road which runs north to south along the western boundary and the A322 which connects junction 3 of the M3 with the towns of Bracknell to the North and Guildford to the South. The A30 runs east to west through the Borough and connects the Blackwater Valley with London and the South West of England. The Local Highway Network in Surrey Heath suffers congestion in certain areas, especially at peak times. The Draft Surrey Heath Local Transport Strategy identifies particular areas where congestion arises. The A322 and A331 Blackwater Valley Relief Road approaches to M3 Junctions 3 and 4 respectively are areas of significant peak time congestion. The A30 corridor suffers peak time congestion from Bagshot in the east to the Surrey / Hampshire border west of Camberley.

Based on the 2011 Census, Surrey Heath has one of the highest rates of car ownership in England and Wales with 90% of households owning a car or van, higher than the rest of Surrey. High levels of car ownership reflect the prosperity of the area, but also the historically poor public transport facilities. Vehicle emissions account for a large proportion of local air pollution within the Borough. The Department of Food and Rural Affairs (DEFRA) has identified one Air Quality Management Area (AQMA) in Surrey Heath known as the Camberley AQMA which runs parallel to the M3 from Junction 4 at Frimley up to the A325 Portsmouth Road at the Ravenswood roundabout in Camberley.

There are three rail stations situated within the Borough at Bagshot, Camberley and Frimley, all of which are served by a branch rail line between Ascot and Guildford. Aside from a few very early morning services there are no direct rail links to London with commuters required to change at Ascot. Many commuters living in Surrey Heath therefore use nearby faster services from stations outside the Borough at Farnborough, Woking and Sunningdale.

Camberley is however served by good bus links to the wider Blackwater Valley with the Number 1 bus service running frequent and regular services between Old Dean and Aldershot. A bus lane is situated just west of the town centre on the A30 which runs in an east to west direction towards the Meadows Gyrotory. This has improved bus journey times. Bus links in the east of the Borough are not served by such frequent or regular services.

Improvements to the off road pedestrian and cycle provision along the Basingstoke Canal tow path including the section between Deepcut and Brookwood can help alleviate car use for short and medium length journeys.

Trends

The high level of dependence on the private car is expected to continue into the future. This is likely to be exacerbated by the ongoing lack of a direct rail link to London and much of the wider Blackwater Valley Area. As a result, it is anticipated there will be an increase in the number of car journeys on both the local and strategic road networks in peak hours overall. Despite this anticipated increase in traffic, there should be a proportionate increase in capacity due to highways improvements projects at both a strategic and local level. The potential of increased congestion should therefore be mitigated accordingly.

Key issues

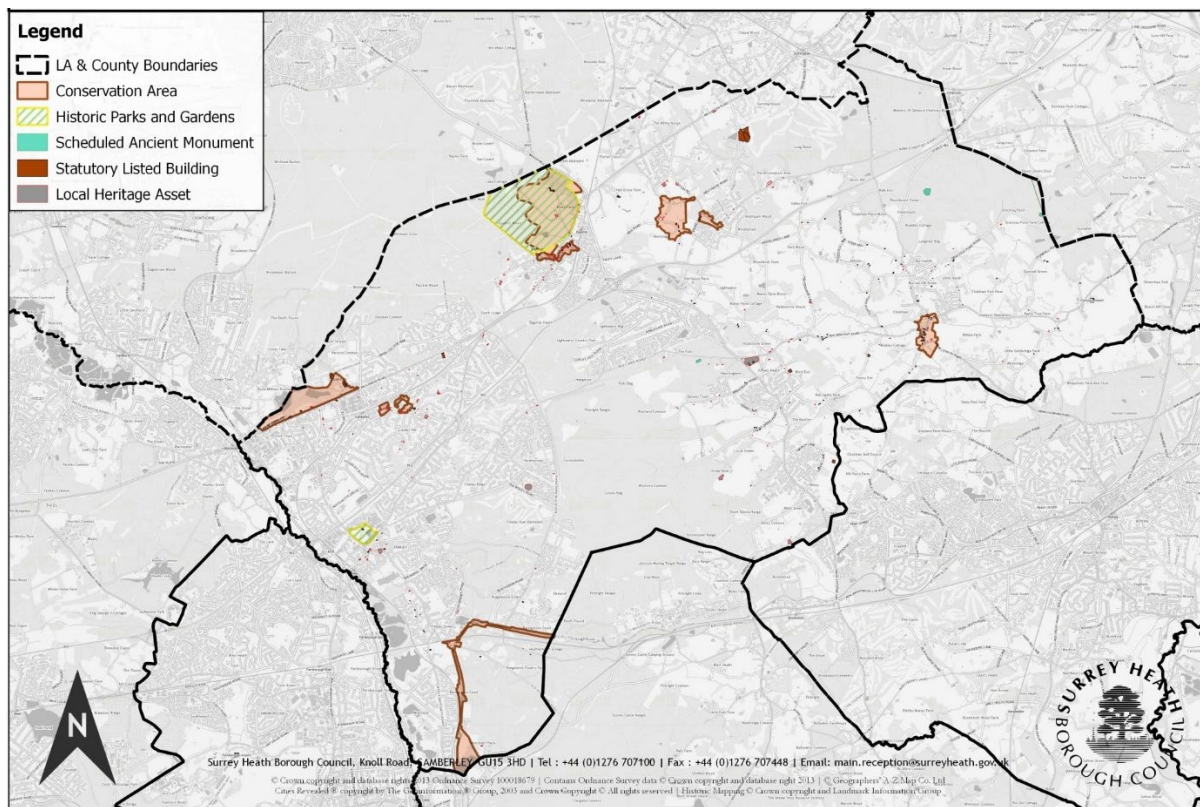
Issue	Source	How might the Local Plan address this?
Increased congestion on roads in and around the Borough particularly during peak hours as a result of the motor car being the most commonly used form of transport for commuters.	Baseline Information Evidence base	Policy should support improved public transport in the Borough, as well as the integration of pedestrian and cycle routes in future development. Additionally, policy should encourage new development in sustainable locations which will assist in reducing then need to travel or have accessibility to sustainable modes of transport.
Continued lack of direct rail links to London	Baseline information	Policies should encourage joint working with partners such as Network Rail in order to achieve improved rail services. Furthermore, development can be encouraged in sustainable locations within proximity of train stations thus creating higher demand for direct rail services to London.
Eastern areas of the Borough are not served by regular or frequent bus services.		Future policy should support and encourage proposals that will improve Surrey Heath's public transport network, particularly in the east of the Borough. This should include joint working with Surrey County Council and local bus operators.

Cultural heritage

As shown within Figure D, there are 181 statutory Listed Buildings or structures in Surrey Heath comprising 1 no. Grade I, 5 no. Grade II* and 175 no. Grade II Listed Buildings. There are 203 locally Listed Buildings and structures and 14 areas of High Archaeological Potential.

The Borough also contains 4 Scheduled Monuments and 2 Historic Parks and Gardens. There are 9 Conservation Areas; 3 in Bagshot, 2 in Camberley, 1 in Chobham, 2 in Windlesham and the Basingstoke Canal which enters Surrey Heath from Ash Vale in Guildford Borough, runs from Mytchett through to Deepcut and back into Guildford Borough at Pirbright.

Figure D. Cultural heritage designations in Surrey Heath



Trends

There is unlikely to be a significant change in the current situation, although the Borough Council will designate additional Locally Listed Buildings in the future if they are considered of architectural or historical merit.

There are currently no structures in Surrey Heath that feature on the Heritage at Risk register nor have any local issues with cultural heritage been identified. The buildings and structures as already listed will require continued protection and this may be an issue when considering future development as well as the setting of Listed Buildings and Conservation Areas (whether statutory or local).

Key issues

Issue	Source	How might the Local Plan address this?
Development could affect Conservation Areas, Listed Buildings & structures.	Baseline Information Evidence base	Policy should provide continued protection and enhancement of the historic environment.
Development could affect the setting of Conservation Areas, Listed Buildings & structures.	Baseline information	Policy should ensure full consideration of the setting of the historic environment in future development.

Material assets

Although there is no set definition of what constitutes material assets, this section will focus on housing, infrastructure and minerals.

The Local Housing Needs Assessment, 2020 identifies growth of approximately 13.7% in total population over the period to 2040 and an increase in total households of 19%. The greatest proportional growth is expected in older persons with numbers of households headed by someone over 85 forecast to increase by 104%. Households in some working age groups (40-59) are forecast to see negative growth .

Surrey Heath is an expensive place to live with house prices and rental costs higher than the South East and national averages, although lower than the averages for Surrey. Affordability in Surrey Heath deteriorated by 89.9% between 2002 and 2018, a higher rate than for England and Surrey.

There is a greater than average supply of 3 bed houses in the Borough and also a higher proportion of 4+ bedroom houses in owner occupation (44%) and the private rented sector (17%) compared to the County and England. There are a significantly lower proportion of 1 bed dwellings in the private rented sector (18%) compared to Surrey (24%) and England (33%).

A large proportion of Surrey Heath residents live in 2 person households, which comprise 36% of all households. According to the ONS Neighbourhood Statistics demonstrated in Table D below, the number of households who own their property in the Borough is 77% with the remainder split 10% social rent, 12% private rent and 1% shared ownership. There is a higher percentage of households owned outright or with a mortgage or loan in Surrey Heath than the South East and England averages. There are lower levels of privately rented households, an equal number of social rented (other) and much lower social (rented from Council) households than the South East and England averages. The Council has sold the majority of its housing stock to registered social landlords and other social housing providers which explains the very low proportion of social (rented from Council) households.

Table D. Households by tenure

Tenure	Surrey Heath	South East	England
Owned; Owned Outright	35%	33%	31%
Owned; Owned with a Mortgage or Loan	42%	35%	33%
Shared Ownership (Part Owned and Part Rented)	1%	1%	1%
Social Rented; Rented from Council (Local Authority)	1%	6%	9%
Social Rented; Other	8%	8%	8%
Private Rented; Private Landlord or Letting Agency	10%	15%	15%
Private Rented; Other	2%	2%	1%

As of January 2020, there were 2 public sites (29 pitches); 2 unauthorised sites (7 pitches); and 1 Travelling Showpeople yard with permanent planning permission (6 plots).³⁷

The Borough is served by a number of infrastructure services/facilities which also serve the wider area. Major Infrastructure includes the M3 Motorway and A331 Blackwater Valley Relief Road Primary Route; Camberley, Lightwater and Chobham sewerage treatment works; Frimley Park Hospital; Bagshot, Camberley and Frimley Rail Stations; Four state secondary schools and 25 state infant/junior/primary schools³⁸ and two leisure centres, one in Camberley the other in Lightwater. There is an additional sports centre in Frimley which is open to the public at evenings and weekends.

³⁷ See <https://www.surreyheath.gov.uk/sites/default/files/GTAA%20-%20%28Gypsy%20and%20Traveller%20Accommodation%20Assessment%29%20Final%20Report%202020.pdf>

³⁸ Surrey Heath Primary Schools 2016/17, SCC https://www.surreycc.gov.uk/data/assets/pdf_file/0003/66108/Information-on-Primary-Schools-2016-Surrey-Heath-V5.pdf

There are no identified capacity issues with respect to gas, electricity or water supply although some reinforcing may be required as part of the Princess Royal Barracks development in Deepcut. No specific capacity issues have been identified with waste water drainage.

The Surrey Minerals Plan: Core Strategy 2011 (SCC) does not highlight any areas of the Borough as safeguarded for mineral workings.

Green infrastructure and waterways play a role as part of the valued landscape of Surrey Heath.

Trends

Given increasing population levels it is considered that the need and demand for housing will continue into the future. The main type of occupation will continue to be owned rather than rented. The proportion of two person households in the Borough may reduce in the future with one person households increasing.

A growing population is likely to increase pressures on existing services/facilities, although this is not expected to be at a level which would be significantly detrimental.

Key issues

Issue	Source	How might the Local Plan address this?
Increasing population increases demand for affordable units	Baseline Information	Future policy should set guidelines for the % of affordable housing required, dependent on number of units provided. Policy should regard shared-ownership accommodation as a further element in achieving a greater mix of tenures and providing a wider range of affordability in housing. A range of dwelling sizes and types should be encouraged..
Additional pressures on existing infrastructure services/facilities	Baseline information	Policy should ensure projects are delivered in accordance with an updated Infrastructure Delivery Plan. Contributions will continue to be collected through CIL as specified in the CIL Charging Schedule and prioritised according to the Reg123 List.

Landscape

Natural England has undertaken a National Character Areas (NCA) study (formerly known as joint character areas) which categorise areas in England with similar landscape characteristics by region.

The Borough of Surrey Heath falls into an NCA defined as 'Thames Basin Heaths' which is characterised by: -

- Particularly diverse landscape unified by the high incidence of heathland and coniferous forestry;
- Heavily populated and developed area characterised by large towns plus numerous smaller settlements along transport corridors interspersed by open land;
- Fragmented but often connected blocks of largely neglected remnant heathland as a result of early agricultural clearances and widespread development;
- The western part of the area is fairly well-wooded with grazed pasture but retains a heathy character due to the dominance of oak/birch/bracken/pine and remnant heath on small unimproved pockets of land;
- Variety and contrast is given by the wide grazed floodplain, drainage ditches, restored gravel workings and lush wetland vegetation;
- Large tracts of coniferous plantations or mixed wood with beech and birch are typical of much of the area, with significant areas of ancient woodland in the west.

The west of the Borough is generally urban in character with the settlements of Camberley, Frimley, Frimley Green and Mytchett sitting alongside the A331 Blackwater Valley Relief Road, bisected by the M3 motorway. This urban character continues on the western side of the Blackwater Valley Relief Road with the conurbation of Farnborough and Aldershot in Rushmoor Borough and to the northwest of Camberley at College Town, Owlsmoor and Sandhurst in Bracknell Forest Borough. However, dispersed within the urban areas are pockets of open green space which serve general recreational needs. The general topography is one of gradual inclines away from the Blackwater

Valley towards the north and east leading to areas of Heathland. The Blackwater Valley landscape has been altered by the legacy of sand and gravel extraction.

The centre of the Borough is characterised by sharper inclines sloping eastward and leading to elevated ridge landscapes on plateau gravels known as the Chobham Ridges. This area is covered by tracts of heathland with some mixed deciduous and/or conifer woodland. The central area is separated from a similar landscape at Chobham Common and Ribs Down to the east by the river valleys of the Windlebrook/Halebourne/Millbourne and The Bourne.

From the central area the landscape slopes down towards the east, encompassing the river valleys of the Windlebrook/Halebourne/Millbourne and The Bourne. It is characterised by open pasture and low lying meadows forming areas of floodplain. The eastern area is predominated by open countryside, much of which is designated as Green Belt but includes the rural settlements of Bisley, Chobham, West End and Windlesham.

The townscape of the main settlements in the west varies from Edwardian terraces, post war housing, private estates built in the 1970's and 1980's as well as more sylvan areas predominated by larger dwellings set in large plots. As such there is no one distinct architectural or townscape style. The eastern settlements are characterised as rural villages with a mix of house types and architectural styles with the centre of Chobham retaining its historic core.

Trends

It is considered that many of the landscape/townscape features associated with the Borough will remain largely unchanged in the future. However, the allocation of the Princess Royal Barracks in Deepcut for residential led development will change the landscape in this area, although this should be seen in the context of existing development at the site and potential for development to 'bed-in' over time.

Key issues

Issue	Source	How might the Local Plan address this?
Protection of most valued landscapes and townscapes	Baseline Information	Policy should seek to protect landscape/townscape character, particularly in the most valuable locations, which should already have additional protection such as Conservation Area Status. Development should be sympathetic to its surroundings and of high quality design and layout.

Climate

In 2019, the Borough Council declared a Climate Change Emergency setting out the intention to become carbon neutral across its own estate and operations by 2030. Like the rest of the UK the likely implications of climate change in the Borough will include higher average temperatures, particularly in summer and winter, changes in seasonal rainfall patterns, along with more intense periods of rainfall and the likelihood of more very hot days and heatwaves.

The Surrey Heath Climate Change Study, (AECOM, 2020) showed that the total carbon emissions for the Borough in 2017 was 417,346 tCO₂e. The greatest contributor to this was domestic energy use, accounting for 41% of emissions, with road transport the next greatest contributor (33%). Whilst overall emissions have dropped considerably since 2005, the Borough has a higher than UK average level of carbon emissions per square km.

The Thames Catchment Flood Management Plan (CFMP)³⁹ identifies the urban west of the Borough as lying in a zone of 'expanding towns in floodplain locations' with sources of flooding identified as a combination of river, surface water and sewer systems. The east is defined as Towns and Villages in Open Floodplain (north & west). The CFMP also highlights up to 250-500 properties at risk of flooding in a 1% annual probability river flood.

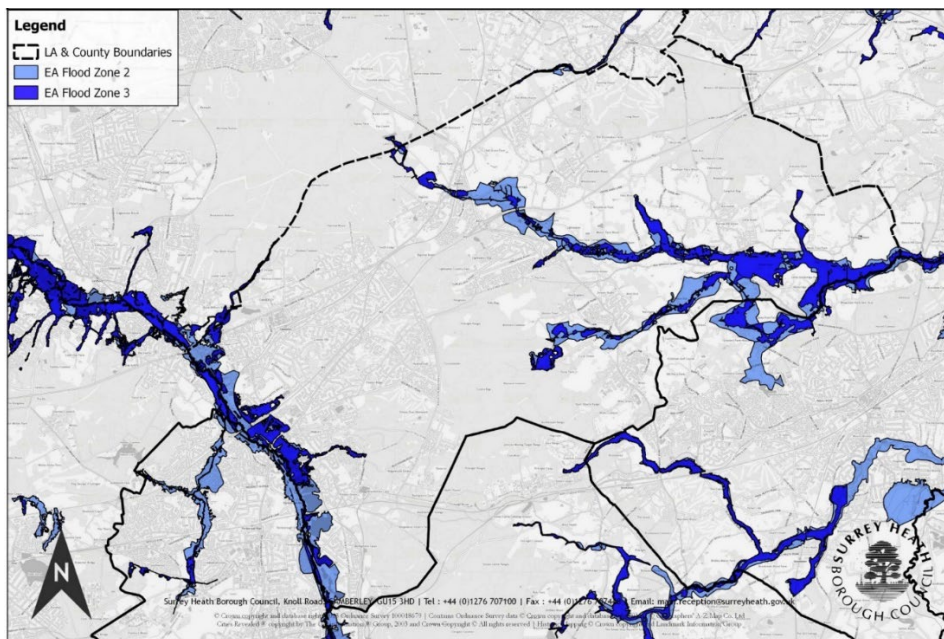
Working with Local Planning Authorities, the plan aims to avoid any increase in flood risk from future urban expansion, including in the Blackwater Valley. The CFMP Policy for the sub-area is to continue to manage risks effectively but further action may be required to keep pace with climate change. In the east, the policy is to take further action to reduce the risks of flooding where possible with proposed actions identified as maintaining capacity of rivers to reduce flood events and retain remaining floodplain.

³⁹ Thames Catchment Flood Management Plan: Summary (2009) Environment Agency. Available at: <http://publications.environment-agency.gov.uk/pdf/GETH1209BQYL-e-e.pdf>

The Borough Council’s Strategic Flood Risk Assessment (SFRA), 2015⁴⁰ assessed which areas of the Borough, were liable to flooding from fluvial (river) Sources (with climate change considered). In the west this is mainly along the Blackwater river corridor and in the east from the Windlebrook/Halebourne/Millbourne and The Bourne. Figure E overleaf displays areas of the Borough at risk of fluvial flooding as identified by the Environment Agency (EA) Flood Zones.

Even where areas of the Borough are not affected by fluvial flood risk, they may fall within areas at risk from other sources of flooding such as run-off, sewer or groundwater inundation as indicated within the SFRA. The Basingstoke Canal to the south of the Borough is an artificial source of flooding. The SFRA highlights residual flood risk from the Basingstoke Canal at Frimley Lodge Park near Mytchett and along the Deepcut flights.

Figure E. Flood risk in Surrey Heath



Trends

Despite the onset of climate change it is unlikely that fluvial flood risks will increase significantly. Regard will be given to updated climate change guidance. Given the potential for more intense rainfall events as a consequence of climate change, coupled with the amount of existing hard landscaping in and around the urban areas of the Borough, the issue of flooding from other sources arises. Intense rainfall events must be considered against the updated climate change allowance to consider whether there would be an increase in fluvial flooding.

Whilst it could be considered that carbon dioxide emissions will continue to rise in the future given the reliance on travelling by car and the need for additional dwellings, there is the potential for technological advances including clean energy and increased levels of sustainability in buildings. Furthermore, an increased general awareness of the harm to the environment that emissions can cause, initiatives to reduce emissions and increasingly economical private motor vehicles could help stabilise or even reduce emissions. However, the estimates for temperature increases and rainfall are unlikely to change significantly. Applicants would need to submit a Flood Risk Assessment with applications for major development in Flood Zone 1 to take account of surface water drainage.

Key issues

Issue	Source	How might the Local Plan address this?
Intense rainfall events may give rise to non-fluvial flooding.	Baseline Information Strategic Flood Risk Assessment	Future policy should ensure Flood Risk Assessments (FRA) are required for all planning applications in flood zones 2 and 3 as well as areas of potential surface water flooding as identified in the updated SFRA (2015).

⁴⁰ Strategic Flood Risk Assessment: Volume 2 Technical Report (2015) Capita. Available at: http://www.surreyheath.gov.uk/sites/default/files/documents/residents/planning/planning-policy/LocalPlan/EvidenceBase/SH_SFRA_Vol2_TechRep102015v2.pdf

Issue	Source	How might the Local Plan address this?
		In cases where specific flood risk assessments identify a risk, policy should require measures to be put in place in order to minimise this to a sufficient standard, which will be determined. In addition, all development proposals should demonstrate how they will incorporate SuDS in the scheme to mitigate surface water run-off.
Continual reduction of carbon dioxide emissions is essential in order to assist in meeting the national target	Baseline Information	A combination of policies should contribute to the overall reduction of greenhouse gasses, particularly CO ₂ . This will include the promotion of sustainable development locations and sustainable modes of transport. Policies should require design guidance that facilitates renewable and low carbon development.

Soils

The main geological deposit in the Borough is sand under laid by Reading and Bagshot beds with alluvial deposits within the river corridors. Extensive mineral extractions have taken place in the west of the Borough (gravel) which has been subject to restoration. The acidic soils in the central area of the Borough support a predominantly heathland habitat.

Agricultural land makes up 26% in Surrey Heath. The agricultural land classification identifies the best and most versatile (BMV) agricultural land as classes 1, 2 or 3a. Surrey Heath does not have any class 1 or 2 BMV and only 10% of agricultural land is classified as BMV 3.

There are no sites within Surrey Heath identified as contaminated, but there are 49 potentially contaminated sites which would require further investigations if development consents were sought. This excludes land owned by the Ministry of Defence (MOD) which is under the jurisdiction of the Environment Agency.

The percentage of dwellings permitted in Surrey Heath on previously developed land from 2012-2016 was 81.2%.

Trends

In future, it is likely that some non-PDL sites may come forward, as well as sites on previously developed land. If even a limited number of sites in rural locations were allocated through the Local Plan, this would reduce the overall percentage of dwellings built on PDL. However it is unlikely that it would be a significant reduction. Due to the nature of the Borough's land availability constraints, it is likely that the majority of development would still be built on PDL. Soil quality is likely to remain relatively stable in the future and opportunities may present themselves to remediate land if contamination is present.

Key issues

Issue	Source	How might the Local Plan address this?
New dwellings within countryside locations would lower the percentage of dwellings built on PDL and potentially reduce soil quality.	Baseline Information	Policy should encourage PDL sites to be considered in the first instance provided that they meet other sustainability criteria. However, where PDL sites cannot meet housing requirements alone, it will be necessary to consider other options.

Air

Mortality attributable to particulate air pollution in Surrey Heath is similar to that for England and Surrey overall. Around 4.6% of all deaths in Surrey Heath among people over 30 years of age are due to human-made air pollution.⁴¹ Partners across Surrey Heath could begin to work to lower air pollution and its effects through development of sustainability strategy and evidence based projects such as air alerts and travel initiatives such as increasing active travel and car-pooling.

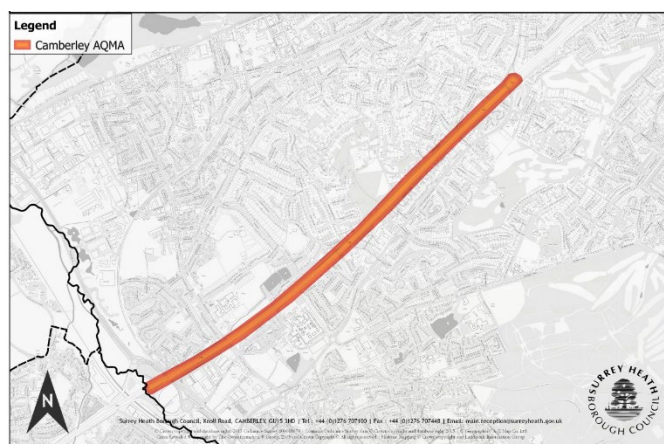
Vehicle emissions are now the principle source of air pollution in the UK given the decline of using coal for domestic heating or in coal-fired power stations. Emissions from vehicles can include carbon monoxide, carbon dioxide,

⁴¹ <https://www.surreyi.gov.uk/health-profiles/surrey-heath/#header-air-quality>

oxides of nitrogen, volatile organic compounds (VOC) and particulate matter (PM₁₀). These pollutants can have a detrimental effect on human health and the natural and built environment.

The main air quality issues within Surrey Heath are associated with the emission of pollutants from road traffic, in particular the M3 motorway.⁴² The main pollutant of concern is nitrogen dioxide (NO₂). Over previous years the concentrations of NO₂ measured along the M3 corridor, between the Frimley flyover and just north of the Ravenswood roundabout (A325), led to the conclusion that exceedances of the annual mean objective for NO₂ were likely in this area and in 2002 an Air Quality Management Area (AQMA) was declared (see Figure F). The following year a more detailed assessment concluded that the AQMA should be extended in both directions along the M36. Since then SHBC has continued monitoring within the borough and the AQMA has been retained.

Figure F. Approximate boundary of Camberley AQMA



With the exception of road traffic, there are no significant sources of local emissions in the borough.⁴³

Following the declaration of the AQMA in 2002, an Air Quality Action Plan (AQAP) was required. The AQAP was adopted in 2005 and set out the measures SHBC intended to implement to address air quality issues in the borough and to meet the air quality objectives.⁴⁴ Also included in the AQAP were considerations and options for Highways England (formerly the Highways Agency) to consider. It is acknowledged that the existing AQAP is a number of years old and an updated action plan may be required should the AQMAs be retained in future years.

In the 2007 Action Plan Progress Report it was highlighted that 46 of the 51 proposed actions had been completed, including 25 that were completed on time. In 2014, Highways England commenced work on upgrading the M3 Motorway between junctions 2 and 4 to a Smart Motorway. The upgrade was completed during 2017 and was anticipated to improve air quality at locations near to the M3, and it appears this has proven to be the case.

As per the most recent Air Quality Status Report (ASR, 2021)⁴⁵ overall, the NO₂ monitoring results indicate a decrease in annual mean NO₂ concentrations across the borough in comparison to the previous year with only one site experiencing a slight increase.

It is considered that the AQMA for PM₁₀ will be revoked in the near future as there have been no exceedances at relevant exposure locations for over 5 years. However, due to continuing elevated annual mean NO₂ concentrations in the previous 3 years it is considered prudent to retain the existing AQMA for NO₂. T

NO₂ can have adverse effects on natural habitats which are dependent on low levels of nutrients such as the lowland heathland covered by the Thames Basin Heaths SPA and Thursley, Ash, Pirbright and Chobham Common SAC. The Department of Transport's Transport Analysis Guidance (TAG) Environmental Impact Appraisal⁴⁶ states that beyond 200m the contribution of vehicle emissions from the roadside to local pollution levels is not significant. The majority of highways within Surrey Heath do not lie within 200m of the SPA/SAC, but several do.

Trends

The main source of NO₂ produced within the borough is from road traffic exhausts, but these sources, being the motorway and major trunk roads, are ones over which the Council has little control. While the M3 Smart Motorway

⁴² https://www.surreyheath.gov.uk/sites/default/files/documents/residents/environmental-health/ASR2021_final.pdf

⁴³ https://www.surreyheath.gov.uk/sites/default/files/documents/residents/environmental-health/ASR2021_final.pdf

⁴⁴ https://uk-air.defra.gov.uk/assets/documents/no2ten/Local_zone31_SurreyHeath_AQActionplan_1.pdf

⁴⁵ https://www.surreyheath.gov.uk/sites/default/files/documents/residents/environmental-health/ASR2021_final.pdf

⁴⁶ TAG Environmental Impact Appraisal (2014). Available at: www.gov.uk/government/publications/webtag-tag-unit-a3-environmental-impact-appraisal-november-2014

Scheme has improved air quality at locations near to the M3, additional traffic generated from the extra capacity could negatively impact the Camberley AQMA. However, this will be mitigated over time as increasingly cleaner vehicles with lower emissions come into wider use. For example, SHBC recently commenced an initiative partnering with an energy supplier to install Electric Vehicle (EV) charging points in public places.

In addition, infrastructure schemes such as the M3 Smart Motorway will help minimise congestion, which in turn will reduce pollutants and improve air quality. Given the likelihood of technological advances and the replacement of older vehicles with new, that air quality issues arising from vehicle traffic will be likely to improve overall.

Key issues

Issue	Source	How might the Local Plan address this?
Future development and highways projects could generate additional traffic related emissions close to SPA/SAC	Baseline Information	Policy will need to consider impact of traffic generation on roads located within 200m of the SPA/SAC.
continuing elevated annual mean NO2 concentrations in Camberley AQMA	Baseline Information SHBC 2021 Air Quality Annual Status Report	The level of traffic in the AQMA is generated by the M3 motorway. This is managed by Highways England and much of the traffic is simply passing through the Borough. However, the Borough Council can assist in reducing overall traffic flows by working with Surrey County Council to encourage other methods of transport. This will help to avoid exacerbating the issue with increased localised journeys on the motorway.

Water

The Thames River Basin Management Plan produced by the Environment Agency divides the Thames catchment into units, one of which is unit R9, the river Blackwater which covers the west of the Borough. Ecological quality of the Blackwater is currently considered 'moderate' with the aim of reaching 'good' status by 2027. The river basin management plan also shows groundwater unit G32 (Farnborough & Bagshot Beds) as being of good quality and has the designation 'Drinking Water Protected Area'.

The east of the Borough is located within catchment unit R19 and R20 which covers the Addlestone Bourne (West End to Hale/Millbourne in R19) and Hale/Millbourne (Bagshot to Addlestone Bourne confluence near Chobham in R20) The ecological quality of unit R20 is also moderate with the aim to achieve good status by 2027. Groundwater unit G6 (Chobham Bagshot Beds) covers the east of the Borough and its status is poor, with the aspiration of achieving good qualitative status by 2027. The groundwater unit also has a designation of 'Drinking Water Protected Area'.

In terms of water resource Surrey Heath lies in an area of water stress as identified by DEFRA. The Water provider for the west of the Borough is South East Water and in the east is Veolia Water. The Basingstoke Canal suffers from water shortages, especially in the summer months and this is reflected in the condition status of the SSSI.

South East Water's Water Resource Management Plan (WRMP) identifies the west of the Borough within Resource Zone 4, which is expected to remain in surplus up to 2035 albeit by transferring water from Resource Zone 5 and planning for additional supply. The study tested the Water Resource Zone's deployable output in response to climate change. This was tested against three scenarios of climate change effects: 'dry' (worst case) scenario, 'mid' scenario and 'wet' (best case) scenario. Water Resource Zone 4 was shown to be relatively unaffected by the 'mid' and 'wet' scenarios. Only the 'dry' scenario demonstrated a significant adverse impact.

The east of the Borough falls within the Southern Resource Zone in the Veolia Water Resource Management Plan (Central). The Veolia WRMP proposes that supply will be maintained over the period to 2035 through water metering coupled with further leakage reductions.

The Loddon Abstraction Licensing Strategy (CAMs) produced by the Environment Agency (EA) identifies the west of the Borough as within Assessment Point Catchment 7 – Blackwater (AP7B). AP7B is classified as having 'water available' although it informs that this status is overridden by the flow requirements of the Thames, which modifies the status to 'Water not available'. Recourse reliability for consumptive abstraction is determined through an availability test which indicates availability for AP7B at less than 30% of the time (the lowest of 5 categories).

The Environment Agency's Thames Catchment Abstraction Licensing Strategy (TCAMS) identifies the east of the Borough as within AP6 – Kingston Catchment Area (AP6K). The entire TCAMS catchment area has a bespoke licensing strategy which allows for greater water availability than the baseline conditions. Following the application of this strategy, AP6K is classified as having 'restricted water available', subject to water flow levels. Consumptive abstraction is indicated as available for more than 70% of the time.

A small area of the Borough around Deepcut lies within the Wey Catchment Abstraction Licensing Strategy at AP6 – Hoe Stream. This unit is shown as having 'water available' though again, this status is overridden by the flow requirements of the Thames. Consumptive abstraction is indicated as available less than 30% of the time.

Trends

It is considered likely that the ecological and chemical status of the river Blackwater, Hale/Millbourne and Bourne will improve over time given the environmental objectives contained within the Urban Waste Water Treatment Directive and Water Framework Directive. The South East is likely to remain an area of high water stress, although South East Water and Veolia predict water availability up to 2035.

Changes to the Building Regulations and planning policies in terms of water efficiency could help to reduce water demand in the future, however this may be off-set by increases in the local and wider population. Development at the Princess Royal Barracks in Deepcut may help to recharge water to the Basingstoke Canal.

Key issues

Issue	Source	How might the Local Plan address this?
South East will remain an area of high water stress	Baseline Information	Policy should set criteria in order to achieve water efficiency in new development. Through good design principles, policy should ensure water consumption in residential development is reduced to more efficient standards.

Waste

Surrey Heath Borough Council is the waste collection authority in Surrey Heath, whilst Surrey County Council is the waste disposal authority. The Borough Council only collects waste from households and does not collect any commercial, industrial or hazardous waste.

There is currently a general trend of increasing household waste levels in Surrey Heath, however since the introduction of a bi-weekly refuse collection and implementation of specialised recycling bins for each household, recycling rates have improved dramatically and are now consistently above both the averages for the South East and for England. Since 2013/14 the rates are slightly lower than in previous years, which can be accounted for by changes made to materials that are considered suitable or unsuitable for recycling. In terms of the overall recycling rate, the national target of '50% by 2020' as set out in the Waste Strategy 2007 has consistently been exceeded by Surrey Heath since the year 2009/2010.

The Surrey Waste Core Strategy (2011) does not identify any areas or sites within Surrey Heath for the allocation of waste facilities. However, two sites within existing Core Employment Areas in Camberley are mentioned as possible waste management facilities. Surrey County Council is currently in the process of producing the Surrey Waste Local Plan, which will ultimately replace the adopted Waste Core Strategy.

Trends

With an increasing population household waste levels within Surrey Heath are likely to increase further. High recycling rates are likely to be maintained, and the scope for improving rates through the Local Plan will be limited.

Key issues

Issue/ problem	Source	How will the Local Plan address this?
Waste levels continue to increase	Baseline Information	Policy should ensure development incorporates sufficient space for waste storage. Sustainable design should be encouraged, where there is ample opportunity for recyclable waste storage, inclusive of a wide range of recyclable materials and provision for composting.

Appendix III: Policy alternatives

Introduction

As discussed in Section 4, whilst the focus of work to explore ‘reasonable alternatives’ has been on the matter of the spatial growth strategy (‘growth scenarios’), supplementary work was also undertaken to define and appraise alternative approaches to addressing thematic development management policy issues / objectives.

A screening exercise was completed that led to a decision to focus attention to two thematic policy areas, on the basis that it was considered likely that alternative policy approaches could be identified with differential ‘significant effects’ in terms of one or more elements of the SA framework (see Section 3), specifically:

- Decarbonisation
- Biodiversity net gain

These two thematic policy areas are discussed in turn below.

Decarbonisation

Introduction

The aim here is to discuss “outline reasons for selecting the alternatives dealt with”, present an appraisal of reasonable alternatives and then present SHBC officers’ reasons for supporting the preferred option.

Selecting reasonable alternatives

Surrey Heath Borough Council declared a climate emergency in October 2019, following declaration of a national climate emergency in May 2019, and the passing into law of an amendment to the Climate Change Act 2008 in July 2019, which set 2050 as the national **net zero** target date. This target date was set broadly in line with the recommendations of the Climate Change Committee, which reflected the international “Paris Agreement” (2015). Most recently, in April 2021, the UK Government committed to an interim target of 78% reduction against 1990 levels by 2035, in line with a further recommendation made by the Climate Change Committee.

The Council has committed to **2030** as a date to achieve net zero in respect of its own operations as an organisation, but has not set an overall net zero target date for the Borough. According to a National Audit Office Report (2021),⁴⁷ more than one-third (38%) of authorities nationally have adopted a commitment to decarbonise their local area by or before 2030, for example nearby Wokingham and Bracknell Forest have both set 2030 as a net zero target date. An earlier study by the Climate Change Committee (2020) found that: “*Over 300 local authorities have declared Climate Emergencies... More than half of these have a Net Zero target date of 2030.*”⁴⁸

Important context comes from the **Surrey Climate Change Strategy** (2020), which sets out a decarbonisation pathway (or ‘trajectory’), with the aim of achieving net zero by 2050. Several interim targets are highlighted along the course of this trajectory, including the target of achieving an 80% reduction against 2019 levels by 2035. The strategy then goes on to discuss priority decarbonisation measures under a series of headings.

The focus here is greenhouse gas emissions from the **built environment**, and in particular from homes. The Surrey Heath Climate Change Study (2020) found that domestic greenhouse gas emissions currently account for around 41% of total emissions, with this set to increase to 51% by 2040.⁴⁹ This anticipated percentage increase reflects an assumption that transport emissions will decrease significantly, due to the switch-over to electric.

Furthermore, it is important to recognise that this large increase in the proportion of total greenhouse gas emissions attributed to domestic buildings is predicted *in spite of* an assumed major reduction in domestic emissions due to electricity use, which reflects the anticipated decarbonisation of the national grid. The implication is that it is continued use of **natural gas** that is the issue for built environment emissions.

Gas is used primarily for heating our homes, hence decarbonising **domestic heating** is seen as a national decarbonisation priority. This point came through clearly within the Government’s Ten Point Plan for a Green Industrial Revolution (2020), with “Point 7: Greener Buildings” focused almost exclusively on decarbonising heating, which means both reducing the demand for heating through efficiency measures and decarbonising sources of

⁴⁷ See nao.org.uk/wp-content/uploads/2021/07/Local-government-and-net-zero-in-England-Summary.pdf

⁴⁸ See theccc.org.uk/wp-content/uploads/2020/12/Local-Authorities-and-the-Sixth-Carbon-Budget.pdf

⁴⁹ See surreyheath.gov.uk/sites/default/files/Surrey%20Heath%20Local%20Plan%20-%20Climate%20Change%20Study.pdf

heat. The Ten Point Plan also notably highlighted that interventions to deliver ‘greener buildings’ are associated with potential greenhouse gas emissions savings far in excess of other interventions - see Table 5.1, above.

Emissions associated with heating are known as **regulated operational emissions**, in that they are covered by the Building Regulations and associated with the operational use of the building. There is also a major focus nationally on minimising unregulated emissions - including both operational (including electricity use for TVs, personal computers and other ‘plug in loads’) and non-operational (i.e. emissions associated with a buildings lifecycle regardless of its operational use); however, the focus here is on *regulated operational emissions*.

The question, therefore, is whether and how to set requirements that depart from (i.e. are more stringent than) the requirements of the **Building Regulations**. It has recently been clarified (following a lack of clarity of recent years) that it *is* within the remit of Local Plans to do so. This clarity was provided in the Government’s response to the Future Homes Standard consultation, in January 2021.⁵⁰ Most recently, in 2022, the Government explained:⁵¹

“Local authorities have the power to set local energy efficiency standards that go beyond the minimum standards set through the Building Regulations, through the Planning and Energy Act 2008. In January 2021, we clarified in the Future Homes Standard consultation response that in the immediate term we will not amend the Planning and Energy Act 2008, which means that local authorities still retain powers to set local energy efficiency standards that go beyond the minimum standards set through the Building Regulations.”

However, at the same time, the Government confirmed that it will be tightening Building Regulations over the coming years, to the point whereby the Regulations require achievement of a defined **Future Homes Standard** (FHS) by 2025. As an interim step towards the FHS, Building Regulations carbon emissions standards will be tightened by 31% in 2022. The Government has also consulted on a Future Buildings Standard for non-residential.

As such, there is arguably relatively little to be gained by setting local policy on regulated operational emissions. Rather, there is an argument for deferring to the Building Regulations, in light of the Government’s FHS commitments, and recognising that there is merit to a consistent national approach and, in turn, a helpful degree of certainty for the development industry.

However, on the other hand, there is an argument for requiring a 31% improvement on Building Regulations through the LPDMP, as a contingency for unforeseen delays to the FHS timetable. This is the “do minimum” approach recommended by the UKGBC Policy Playbook (2021), which explains:

“[T]he Future Homes Standard consultation concluded that a 31% reduction in carbon emissions compared to the current Part L is viable now on a national scale. Indeed the Government confirmed on 19 January 2021 that this 31% uplift will now come into effect in 2022. It is critical to reduce carbon emissions from new homes if the Government’s net zero emission target is to be met. Given this urgency, there is no credible reason to delay the implementation of the 31% reduction target in the wait for the Part L performance uplift.”

On this basis, requiring a 31% reduction in regulated operational emissions compared to the requirements set out in the current Building Regulations, is a reasonable option for the Local Plan.

It is difficult to suggest that a higher percentage reduction figure is reasonable, on development viability grounds, nor is there any reason to explore a lower figure. A 19% reduction figure is required through a number of recent Local Plans, following a Written Ministerial Statement in 2015 (linked to Level 4 of the Code for sustainable Homes);⁵² however, work at the national scale has now established that a 31% reduction is viable.

N.B. whilst some local authorities are requiring, or proposing to require, net zero development through their Local Plans, this necessitates offsetting residual emissions; for example, the London Plan sets out proposals clearly [here](#), explaining that the requirement is to achieve a 35% reduction onsite with remaining emissions offset. The 31% requirement under discussion here is one that must be met *onsite*, without resorting to offsetting.

In conclusion, on the basis of the discussion above, there are two reasonable “do something” policy options:

- **Option 1** – encourage / support schemes that go beyond the requirements of Building Regulations and encourage / support a fabric first approach.
- **Option 2** – as per Option 1, but additionally require that larger schemes achieve a **31%** reduction in regulated operational emissions (onsite) compared to the requirements set out in the current Building Regulations.

⁵⁰ See [gov.uk/government/consultations/the-future-homes-standard-changes-to-part-l-and-part-f-of-the-building-regulations-for-new-dwellings](https://www.gov.uk/government/consultations/the-future-homes-standard-changes-to-part-l-and-part-f-of-the-building-regulations-for-new-dwellings)

⁵¹ See [gov.uk/government/publications/local-government-and-the-path-to-net-zero-government-response-to-the-select-committee-report/local-government-and-the-path-to-net-zero-government-response-to-the-select-committee-report](https://www.gov.uk/government/publications/local-government-and-the-path-to-net-zero-government-response-to-the-select-committee-report/local-government-and-the-path-to-net-zero-government-response-to-the-select-committee-report)

⁵² Also, A 20% reduction was presented as an option as part of the Government’s FHS consultation (2019); however, the 20% ‘option’ presented in the FHS consultation document was described as ‘Future Homes Fabric’, in that the expectation was that the improvement would be achieved through fabric/efficiency improvements alone.

It is recognised that there are other policy options that could potentially be explored, for example options involving net zero carbon development via offsetting, and options that involve specifying *how* onsite emissions reductions should be achieved;⁵³ however, the two options presented above are considered reasonable.

Alternatives appraisal findings

The aim of this section is to present an appraisal of the alternatives introduced above, in summary:

- **Option 1** – encourage / support schemes that go beyond the requirements of Building Regulations.
- **Option 2** – require that larger schemes achieve a 31% improvement on the current Building Regulations.

With respect to methodology:

An appraisal of these alternatives is presented below in an appraisal ‘matrix’. Within each of row of the matrix, the aim is to explore the merits of the alternatives in respect of one aspect of the SA framework (see Section 3). Specifically, within each row, the aim is to both A) rank the alternatives in order of preference, with “=” used where it is not possible to meaningfully differentiate the alternatives, and “?” used to highlight uncertainty; and B) predict ‘likely significant effects’ on a five point scale.⁵⁴

Every effort is made to predict effects / differentiate the alternatives accurately; however, this is inherently challenging given the high level nature of the alternatives. The ability to predict effects / differentiate accurately is also limited by understanding of the baseline (now and in the future under a ‘no plan’ scenario). In light of this, there is a need to make considerable assumptions regarding how alternatives will be implemented ‘on the ground’ and what the effect on particular receptors will be. Assumptions are explained as far as reasonably possible, recognising the need to also ensure conciseness and readability.

Finally, it is important to note that effects are predicted taking into account the criteria presented within the SEA Regulations (Schedules 1 and 2). For example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. the effects of the plan in combination with other planned or on-going strategic activities).

Decarbonisation – alternatives appraisal

Topic	Option 1	Option 2	Discussion
Air quality	=	=	The Future Homes Standard (FHS) consultation document (2019) set out that the Government’s preferred approach, in respect of an interim uplift to Building Regulations, ahead of a further uplift to the FHS, was to require a 31% reduction in emissions compared to the requirements set out in the current Building Regulations. This preferred option was confirmed by the Government’s response to the consultation (2021), and the Net Zero Strategy (October 2021) committed to amending Building Regulations in 2022, to bring the interim uplift into force. The most recent situation is explained by the Government in a response to a Select Committee Report here : “On 15 December, we implemented an uplift for new homes. This is a key stepping-stone that will enable us to successfully implement the Future Homes Standard. Once the uplift comes into force, new homes will be expected to produce around 30% fewer CO2 emissions compared to current standards.”
Biodiversity	=	=	
Climate change adaptation	=	=	
Climate change mitigation	=	=	
Digital infrastructure	=	=	
Economy	=	=	
Education	=	=	
Employment land	=	=	
Flood risk	=	=	

⁵³ For example, the UKGBC Policy Playbook (2021) suggests that, as a minimum, Local Plan policy should require: “A fabric first approach shall be prioritised, ensuring that at a minimum the thermal performance of the whole envelope exceeds that of the notional specification by 5%.” Furthermore, the UKGBC Policy Playbook (2021) recommends that Local Plans give consideration to a host of other policy options relating to built environment emissions, covering operational emissions (regulated and unregulated), non-operational emissions and more. However, there are question-marks regarding the viability of such policy options, and there are concerns regarding creating a complex and confusing policy environment, and uncertainty for the development industry.

⁵⁴ **Red** indicates a significant negative effect; **amber** a moderate or uncertain negative effect; no colour indicates neutral or uncertain effects; **light green** indicates a moderate or uncertain positive effect; and **dark green** indicates a significant positive.

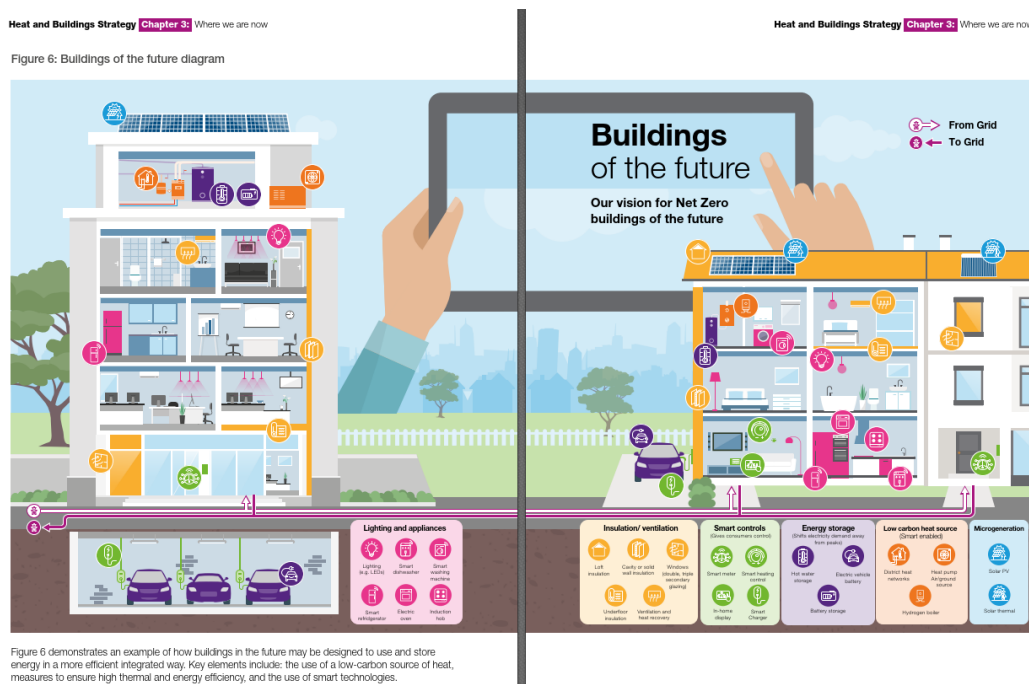
Health	=	=	It is recognised that setting out the requirement within policy could help to ensure that additional cost implications can be taken into account by the development industry at the earliest opportunity, with a view to avoiding conflict with wider sustainability objectives (e.g. in respect of affordable housing needs). There is also a need to encourage the development industry to give early consideration to precisely how the new emissions requirements will be met in a best practice fashion, for example by taking a fabric first approach that does not unduly impact development viability (e.g. thicker walls impact layouts) and that ensures good ventilation without resort to mechanical ventilation technologies (which require careful operation and maintenance). However, the overriding consideration is a need to set draft policy now that is reflective of the likely national context at the time when the Local Plan is submitted for examination. In other words, it would not be appropriate to publish a policy for consultation now that in all likelihood will become out-of-date, and need to be re-drafted, prior to submission.
Historic environment	=	=	
Housing	=	=	
Land	=	=	
Landscape and townscape	=	=	
Poverty	=	=	
Previously developed land	=	=	
Rural economy	=	=	
Safe / secure communities	=	=	
Vibrant communities	=	=	
Waste	=	=	In conclusion, Option 1 is supported from a decarbonisation perspective. Whilst the proposal is only to 'support and encourage' schemes that show ambition, this can and likely will lead to on-the-ground benefits. It is not possible to suggest that Option 2 is notably preferable, from a decarbonisation perspective, given the anticipated timetable for implementing the 31% uplift to Building Regulations. In respect of other sustainability topics the options do not lead to any notable implications.
Transport	=	=	
Water quality	=	=	

Selecting the preferred option

The following text is provided by SHBC officers:

Option 1 is the preferred option, in light of the anticipated timetable for tightening Building Regulations, and given the importance of ensuring flexibility. It is recognised that this is a fast paced policy area, and that there are many detailed considerations that must feed-into planning for low carbon new homes (e.g. see the figure below). The Council will be undertaking a whole plan viability study subsequent to finalisation of the Local Plan for Regulation 19 publication, and that study will explore the potential to set more or less stringent policy requirements under a number of headings, but it is currently not anticipated that the study will explore setting local policy in respect of built environment greenhouse gas emissions.

A figure taken from the UK Heat and Buildings Strategy (2021)



Biodiversity net gain

Introduction

The aim here is to discuss “outline reasons for selecting the alternatives dealt with”, present an appraisal of reasonable alternatives and then present SHBC officers’ reasons for supporting the preferred option.

Selecting reasonable alternatives

A central requirement of **Environment Act** (2021) is that development schemes achieve a 10% biodiversity net gain. This will be measured at the planning application stage, applying the latest Defra ‘metric’, but there is increasing recognition of an important role for Local Plans, including coordination of offsite compensatory habitat enhancement and creation (also referred to as ‘offsetting’). There is also the potential for Local Plans to set a higher percentage net gain requirement, as recently explained by the Government:⁵⁵

“It remains the UK government’s intention to continue to allow higher percentage targets to be set by planning authorities at a local or site level. Any higher target should be made clear at an early stage in the planning or development process and careful consideration should be given to the feasibility and achievability of any requirements above 10 per cent, which can have significant impacts on the costs of developing a site.”

The option of setting a higher percentage requirement is now often a matter for close consideration through Local Plan-making, mindful of implications for development viability. For example, nearby Guildford Borough Council recently published a policy requiring 20% biodiversity net gain for consultation under Regulation 19 of the Local Planning Regulations. The earlier draft version of the plan published for consultation under Regulation 18 also included the 20% requirement, and consultation responses received included:

- Natural England – did not comment specifically on the percentage requirement, but through subsequent correspondence confirmed: *“Natural England welcomes an ambitious 20% net gain target for developments.”*
- The Environment Agency – *“We fully support... the commitment for 20% biodiversity net gain (BNG). We’re really pleased to see the Council striving for a higher figure than the minimum figure proposed by Government and mandating BNG for developments not mandated by Government.”*
- The Woodland Trust – *“We welcome the policy, including strong support for proposals to pursue a net gain minimum target of 20% published the preferred option for consultation.”* The Trust also notably went on to discuss how: *“Appropriate site selection is essential to delivering biodiversity gain...”*
- The Home Builders Federation – objected to the proposal, including on the basis that departing from the nationally prescribed standard (10%, which is set to be mandated through the Environment Bill) would *“inevitably create a conflict with legislation and create confusion and delay.”*

Cambridge City and South Cambridgeshire Councils are also now set to adopt a Supplementary Planning Document (SPD) that encourages 20% BNG, with a recently published [report](#) explaining key reasons as follows: *“... in recognition of the Councils’ declared Biodiversity Emergencies and low baseline of protected and priority habitats within Greater Cambridge, the aspiration within the SPD has been retained to support and encourage developments to maximise opportunities for biodiversity enhancement.”*

Further contextual discussion is presented in Section 5.3, above.

In light of these points, it is clearly reasonable and appropriate to test alternatives, in respect of the percentage BNG that must be achieved by qualifying development proposals. Specifically, it is logical to test:

- **Option 1** – require **10%** biodiversity net gain (N.B. this is a “do something” option on the basis that the national requirement will come into force two years after the Environment Act being enacted).
- **Option 2** – require **20%** biodiversity net gain

Alternatives appraisal findings

The aim of this section is to present an appraisal of the alternatives introduced above. With respect to methodology, see discussion above under ‘Decarbonisation’.

⁵⁵ See consult.defra.gov.uk/defra-net-gain-consultation-team/consultation-on-biodiversity-net-gain-regulations/

Biodiversity – alternatives appraisal

Topic	Option 1	Option 2	Discussion
Air quality	=	=	<p>There are clear biodiversity arguments for seeking to go beyond the nationally prescribed minimum approach. Firstly, this is on the basis of rates of biodiversity loss in Surrey.⁵⁶ Secondly, there are naturally concerns regarding the BNG approach failing to achieve stated biodiversity objectives, and perhaps even resulting in perverse long-term effects that are currently difficult to foresee or fully appreciate, because approaches and methods are in their infancy, and recognising that a focus on BNG will be, to some extent, at the expense of a focus on more traditional approaches to biodiversity conservation and enhancement. For example, CIEEM have discussed a concern that a 10% net gain requirement could be “within the margin of error”, such that it doesn’t deliver “real benefits” in practice.⁵⁷ At the current time, the Biodiversity Metric 3.0 is a proactive and positive step, and progress on bringing forward effective Local Nature Recovery Strategies (LNRSs), both nationally and locally (specifically, work is underway at the Surrey scale), is encouraging; however, ze Ermgassen et al. (2021; see summary in Section 5.3) highlight some significant concerns, including around a piecemeal approach to implementation of biodiversity net gain through planning applications whereby the combined effect is less than the sum of its parts. Biodiversity must be considered at landscape scales and with a long-term perspective, hence it is important that BNG approaches lend support to strategic initiatives, and certainly do not distract from, or lessen the focus on, such initiatives. On one hand, this lends support for requiring a higher (20% net gain figure). However, on the other hand, in the SHBC context there is likely to be relatively good potential for strategically targeted offsite measures given experience of SANG delivery to ensure effective avoidance and mitigation of recreational impacts to the Thames Basin Heaths SPA. Whilst there are tensions between SANG objectives (focused on access) and BNG objectives, and there is a need to ensure ‘additionality’ if and when SANG is used to secure biodiversity credits (i.e. interventions must be additional to what would not have happened in any case), there is cautious optimism regarding the potential for effective and efficient implementation of BNG in the SHBC context.</p> <p>With regards to non-biodiversity objectives, the first point to consider is whether and to what extent there is a risk of 20% BNG leading to a cost on the development industry that reduces funds available for measures focused on the achievement of non-biodiversity objectives, or perhaps even a situation whereby development becomes unviable. These matters may need to be explored in detail through a viability study (e.g. BNG was a focus of the Viability Study for the recent Guildford Development Management Policies Plan). However, at the current time, it is appropriate to flag a risk of Option 2 impacting on the ability to viability address wider policy objectives. Whilst there is little or no certainty, it is appropriate to flag a particular concern regarding affordable housing delivery, which can be, and often is, a matter for negotiation at the development management stage on viability grounds. There are concerns with affordable housing delivery locally, plus there is a need to be mindful that the situation could potentially worsen, if the housing market were to weaken, plus there is a need to consider implications of First Homes policy.</p>
Biodiversity	2	1	
Climate change adaptation	=	=	
Climate change mitigation	=	=	
Digital infrastructure	=	=	
Economy	=	=	
Education	=	=	
Employment land	=	=	
Flood risk	=	=	
Health	=	=	
Historic environment	=	=	
Housing	1	2	
Land	=	=	
Landscape and townscape	=	=	
Poverty	=	=	

⁵⁶ This is a key reason why a [Surrey Nature Partnership Position Statement](#) recommends 20% BNG. However, it is recognised that there is a need to apply caution when comparing rates of biodiversity loss at national and local levels; for example, a species could become locally extinct whilst populations remain relatively healthy at the national scale.

⁵⁷ See cieem.net/wp-content/uploads/2019/02/CIEEM-Net-Gain-consultation-response-Feb2019-FINAL.pdf

Previously developed land	=	=	<p>A further consideration is whether a 20% BNG policy could disproportionately affect the viability of smaller sites, which are important from a perspective of meeting housing delivery targets and housing needs in rural areas, and importantly support SME house builders. Disproportionate impacts are not envisaged, but there is an element of residual risk, ahead of BNG approaches and methods maturing.</p> <p>Finally, there is a need to recognise that an ambitious approach to BNG will also translate into additional ecosystem service benefits to communities, for example in terms of recreation and flood risk. There has been a considerable amount of work nationally to explore how to take the step from a BNG approach to an environmental net gain (ENG) approach; for example, Natural England published a beta Environmental Benefits from Nature (EBN) tool in July 2021;⁵⁸ also, CIEEM has advocated for ENG.⁵⁹ However, even if the focus is on BNG, as opposed to wider (and far more complex) ENG, there will still be wider ecosystem service benefits (albeit recognising that there can also be tensions between achieving biodiversity and wider ecosystem service benefits).</p> <p>In conclusion, an ambitious approach to BNG is supported in respect of the majority of objectives, although there is an element of risk in respect of housing objectives. Risks are uncertain ahead of detailed viability testing.</p> <p>With regards to effect significance, it is possible to predict likely significant positive effects under Option 2 in respect of biodiversity, with other effects much more uncertain and likely to be of lower significance.</p>
Rural economy	=	=	
Safe / secure communities	=	=	
Vibrant communities	=	=	
Waste	=	=	
Transport	=	=	
Water quality	=	=	

Selecting the preferred option

The following text is provided by SHBC officers:

Option 2 is the preferred option. The 20% requirement exceeds the 10% figure recommended nationally but reflects the fact that Surrey has suffered a severe biodiversity decline which is significantly worse than the country as a whole, and is more consistent with the NPPF as the higher figure provides greater certainty that a genuine net gain will be achieved.

Finally, it is important to clarify the Council's proposed approach includes setting supplementary requirements and expectations in respect of:

- Off-site measures - where the full required net gain cannot be achieved on a development site, the remaining gain may be achieved outside the development site, either by the developer or by a third party. In the unlikely event that the required gains cannot be provided through these routes, the Council may negotiate a financial contribution which will be used to secure the required gain by obtaining credits from a 'habitat bank'.
- BNG measures on SANG – measures must complement the recreational purpose and uses of the SANG, and must provide measurable additionality over and above the minimum requirements of the SANG.
- Stewardship - all habitat that is created or enhanced in order to meet the net gain requirement is required to be secured and maintained for at least 30 years.
- Baseline biodiversity units - the biodiversity value of a development site must not be artificially reduced before the baseline for the net gain is set. Where the Council considers that on-site habitat has been degraded or removed intentionally, it will require the baseline to reflect at least the full biodiversity value of the site before the degradation occurred and will apply any punitive measures set out in legislation. Biodiversity sites must likewise not be intentionally cleared or degraded in order to increase the potential for biodiversity gain.

⁵⁸ See ecosystemsknowledge.net/Environmental-Benefits-from-Nature

⁵⁹ CIEEM explain: "Whilst it might seem that both developers and ecologists are still getting to grips with Biodiversity Net Gain (BNG) and offsetting, it is clear that the direction of policy travel in several territories around the world is towards utilising a wider Environmental Net Gain (ENG) approach... This has recently been reinforced by the Natural Capital Committee: "The government should urgently replace biodiversity net gain with environmental net gain, ensuring this applies to all nationally significant infrastructure and the marine environment. Delivery of net zero will become incredibly difficult, if not impossible, without environmental net gain – it is the only approach that considers the impact on the terrestrial and marine ecosystems, including biocarbon stocks." See <https://cieem.net/i-am/influencing-policy/strategic-policy-sub-committee/environmental-net-gain/>

Appendix IV: Chobham Green Belt RAs

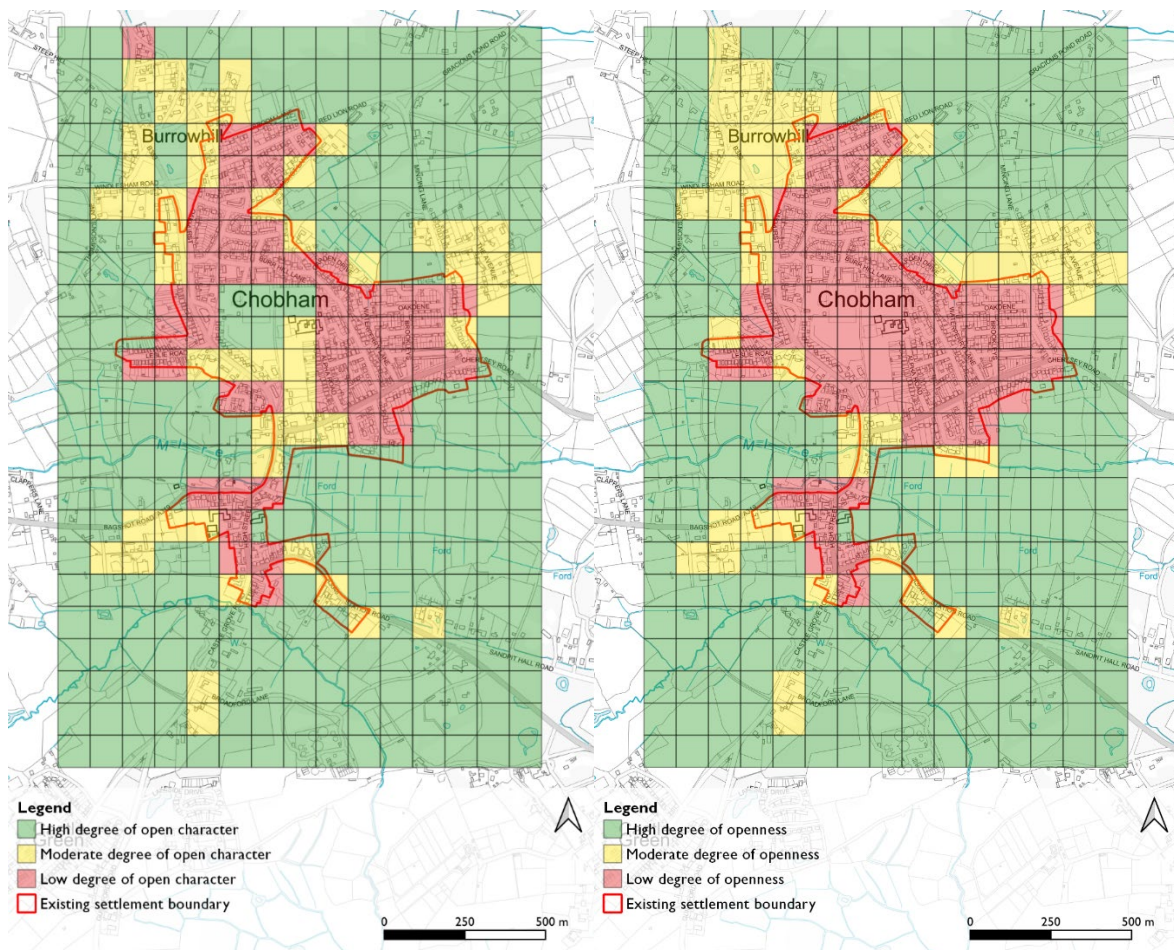
Introduction

As discussed in Section 4, whilst the focus of work to explore ‘reasonable alternatives’ has been on the matter of the spatial growth strategy (‘growth scenarios’), supplementary work was also undertaken to define and appraise alternative approaches to the matter of the Green Belt status of Chobham village.

Background

Chobham is currently ‘washed over’ by the Green Belt, as shown in Figure 2.1, at the start of this report, although it does have a defined settlement boundary. However, a Green Belt Village Study has now been completed, and concludes that much of the settlement does not exhibit an open character and does not contribute significantly to the openness of the Green Belt – see Figure A. As a result the Study sets out that the settlement should be excluded, or ‘inset’, from the Green Belt, as per the other villages in the east of the Borough.

Figure A: Conclusions of the Green Belt Village Study



Selecting reasonable alternatives

With regards to the question of whether or not Chobham should be inset from the Green Belt, there is a strong argument to suggest that there is only one reasonable option, in light of the available evidence, which is to inset. However, because the issue is understood to be potentially somewhat contentious, the decision was made to appraise two reasonable alternatives:

- **Option 1** – so not inset Chobham village from the Green Belt
- **Option 2** – inset Chobham village from the Green Belt

Alternatives appraisal findings

The aim of this section is to present an appraisal of the alternatives introduced above. With respect to methodology, see discussion above, in Appendix III (under 'Decarbonisation'). Please note that Option 1 is essentially the baseline situation and so cannot give rise to significant effects (on the baseline).

Chobham village Green Belt – alternatives appraisal

Topic	Option 1	Option 2	Discussion
Air quality	=	=	It is difficult to differentiate between the alternatives with any degree of certainty, because whilst it is fair to assume that there would be some infilling / intensification of the built form, in the fullness of time, under Option 2, it is not possible to foresee where, or to what extent, this would occur in practice. N.B. the aim of this appraisal is not to consider the merits of specific sites, or any given specific approach to growth at Chobham through the Local Plan. Rather, the assumption, under Option 2, is that additional windfall development would come forward. The appraisal is undertaken mindful of growth at Chobham proposed through the draft Local Plan, including the proposed Rugby Club allocation for 91 homes. However, it is fair to highlight that Option 2 gives rise to tensions with historic environment objectives, over-and-above Option 1. There is no reason to suggest that there would be a 'significant negative effect' under Option 2, given that Local Plan policies would be in place to avoid or suitably mitigate the effects of any development, but it is fair to highlight a degree of concern. This is because there are no other comparable villages to Chobham – namely a village with a comparably high density of listed buildings, complete with a grade 1 listed parish church – in the Borough and, in fact, few if any across a wider area that extends well beyond the Borough. Another potentially relevant SA topic is 'biodiversity', given the inherent sensitivity of Chobham's position in the landscape, closely associated with Chobham Common. However, there is very little if any priority habitat located within the proposed settlement / Green Belt boundary, hence Option 2 is not judged to give rise to any notable concern over-and-above Option 1. In conclusion , Option 2 is clearly a positive step in respect of housing delivery, which is an important consideration given that Surrey Heath is 'exporting' unmet housing need to Hart District, and also given that there may be some locally arising housing needs at Chobham. Option 2 gives rise to tensions in respect of historic environment objectives, but significant negative effects are not predicted.
Biodiversity	=	=	
Climate change adaptation	=	=	
Climate change mitigation	=	=	
Digital infrastructure	=	=	
Economy	=	=	
Education	=	=	
Employment land	=	=	
Flood risk	=	=	
Health	=	=	
Historic environment	★1	2	
Housing	2	★1	
Land	=	=	
Landscape and townscape	=	=	
Poverty	=	=	
Previously developed land	=	=	
Rural economy	=	=	
Safe / secure communities	=	=	
Vibrant communities	=	=	
Waste	=	=	
Transport	=	=	
Water quality	=	=	

Selecting the preferred option

The following text is provided by SHBC officers:

As noted in Paragraph 144 of the NPPF, Green Belt should not be used to afford protection to a settlement unless warranted from a Green Belt perspective. Chobham has an attractive historic core, but that the settlement is historic is not sufficient reason in itself to warrant the retention of the Green Belt designation in this location. Local Plan policies as drafted are considered sufficiently robust in order to ensure that development coming forward across the Plan period within Chobham is suitable from a character perspective, however there is an opportunity to develop an up to date Conservation Area Character Appraisal and Management Proposals document to ensure that the significance of the conservation area and the buildings within it are fully understood, to ensure that future development within the settlement is appropriate.

On this basis **Option 2** is the preferred option.

Appendix V: Site options GIS analysis

Introduction

As discussed in Section 5.3, as a relatively minor step in the process of arriving at reasonable growth scenarios (see Figure 5.1) all site options were subjected to GIS analysis. The outcome of the analysis is in the form of a large spreadsheet of data, with over 100 rows – one for each site option – and around 50 columns, where each column presents performance data (e.g. percentage intersect with a flood zone), supplementary data (e.g. the name of the nearest school) or other attribute information (e.g. the proposed use, or uses, for the site in question).

The aim of this section is to present summary insights, considering the data both:

- within each column of the spreadsheet – i.e. information on the spread of data for each performance measure, including site options that stand-out as performing notably well and notably poorly; and
- across each row of the spreadsheet – i.e. considering how each site option performs, in respect of various locational metrics, both in absolute terms and relative to other site options.

Limitations

GIS analysis of the spatial relationship between site options and various push (e.g. historic environment designations) and pull (e.g. schools) features cannot be considered sophisticated analysis, in that:

- it will rarely serve to highlight an issue or an opportunity associated with any given site option that would not otherwise be readily apparent; and
- many of the issues and opportunities that the analysis does highlight are only 'theoretical', in that they can be discounted, or assigned limited weight in decision-making, upon closer inspection, including after taking into account the proposed use of the site option in question, and also detailed understanding of the proposed scheme. For example, where a site is distant from accessible greenspace this can be addressed by delivery of new accessible greenspace onsite.

As such, GIS analysis of site options should not be overly relied upon, at the expense of a focus on qualitative analysis informed by wide ranging evidence, including the views of stakeholders, and professional judgement.

The analysis should certainly not be used as a primary means for arriving at overall conclusions on site options. Any attempt to utilise the analysis in this way would necessitate a process of Multi Criteria Analysis (MCA) whereby a degree of importance is assigned to each of the performance metrics, and this process is fraught with challenges.

Structure of this appendix

Set out below is:

- further discussion of methodology;
- insights into the data for a series of key metrics in turn; and then
- insights into the data for each of the site options in turn.

Methodology

The first step was to gather GIS data. With regards to data for site options, the Council holds collated data of all sites submitted for consideration as part of the Local Plan-making process (including the Council itself). One of the issues/limitations is that land-owners sometimes submit multiple overlapping sites over time, leading to uncertainty regarding whether certain site options have become superseded. Another challenge is that large land-holdings sometimes get submitted, within which might be contained realistic site options.

With regards to data for constraint/push and opportunity/pull features, considerations include:

- Much data is available nationally, including data for air quality management areas, national biodiversity and historic environment designations and the nationally defined flood risk zones.
- There is no regional or sub-regional data repository (or 'observatory', e.g. as per that currently [under development](#) for the Oxford to Cambridge Arc).

- Much data is held by the Council, including as shown at: <https://surreyheath.gov.uk/maps>. There is a need to focus on data that is held for the Borough as a whole, as opposed to data covering only part of the Borough.

The second step was then to run the analysis, i.e. query the spatial relationship between each site option and each push/pull feature (e.g. distance to a primary school, distance to a listed building). This involved using a GIS tool developed by AECOM, and there are two points to note:

- Distance was measured “as the crow flies” (it can also be possible to calculate distance by road, footpath etc).
- Distance was calculated from the nearest point of each site option (there can also be arguments to calculate distance from the centre point, or from known or likely access points).

Having generated the spreadsheet of data, the third and final step was then to interrogate, utilise and report the data – see discussion below.

Analysis outcomes by metric

The aim here is to present concise insights into trends across the data for a range of key metrics.

Air quality

Air quality management area (AQMA)

Just one site intersects an AQMA, namely Site 904 (Land at Kings International College, Watchetts Drive, Camberley), which is discounted. This site stands out as **performing poorly**. The next closest site is 272m.

17 sites are beyond 4km from an AQMA, at which distance it is fair to say that proximity to an AQMA is likely to be a ‘non-issue’. These sites stand-out as **performing well**.

The table below summarises the performance of the various categories of SLAA site, serving to suggest that distance to an AQMA was not a major factor influencing the process.

Average distance to an AQMA

Category of site	Distance (m)
Permitted	2741
Deliverable/developable	2159
Discounted but shortlisted in Section 5.4	3208
Discounted	2554

Strategic Road Network (SRN)

In addition to proximity to an AQMA, it is appropriate to consider proximity to the SRN, as major roads can be a source of both air and noise pollution.

13 sites are within 50m, and so are judged to stand out as **performing poorly**. Of these sites, four are deliverable or developable (closest being 8m) and two are discounted SLAA sites that are shortlisted in Section 5.4, with the remaining six being discounted SLAA sites.

77 sites are beyond 500m, at which distance it is fair to say that proximity to the strategic road network is likely to be a ‘non-issue’. These sites stand-out as **performing well**.

Biodiversity

There is good availability of data to show areas of varying biodiversity value/sensitivity and, in turn, good potential to highlight site options that potentially give rise to a degree of concern due to intersect (which can suggest a risk of habitat loss) or proximity (e.g. woodlands in proximity to new homes can be at risk of recreational impacts).

The key consideration here is the Thames Basin Heaths Special Protect Area (SPA), designated under the European Birds Directive, which is an internationally important complex of linked sites constraining large parts of the Borough, as well as neighbouring boroughs. There are four main components of the SPA in the Borough, of which three are also designated as a Special Area of Conservation (SAC), under the European Habitats Directive.

Special Protection Area (SPA)

16 sites are within 400m, which is a well-established 'buffer zone' surrounding the SPA, within which housing growth is not suitable. These sites stand out as **performing poorly**.

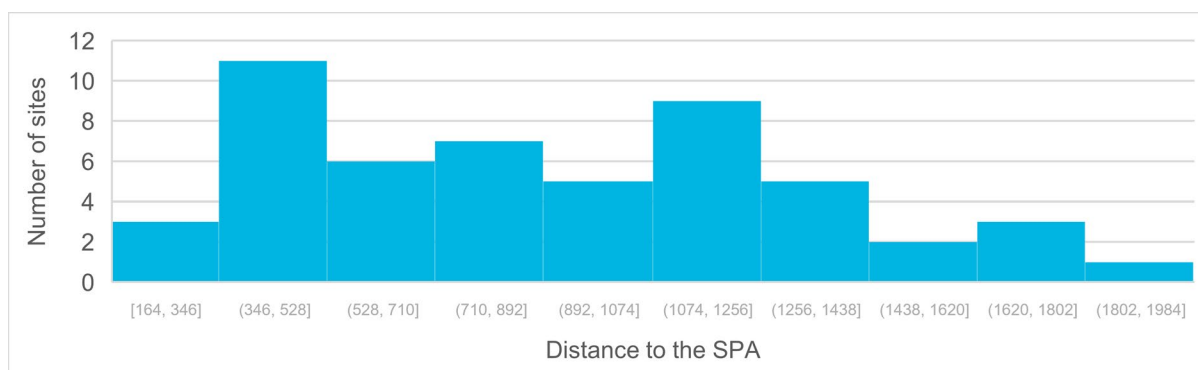
Beyond 400m there are well-established mechanisms in place to ensure that impacts on the SPA are avoided or suitably mitigated, including by ensuring sufficient Suitable Alternative Natural Greenspace (SANG) to avoid worsened recreational pressure on the SPA. Specifically, there is a requirement to provide SANG alongside new housing within 5km of the SPA, with all of Surrey Heath falling within this zone.

However, there is nonetheless a need to avoid reliance on mitigation measures where possible, i.e. there is a preference for avoiding issues/impacts in the first place (the mitigation hierarchy). For example, Natural England define a series of Risk Impact Zones surrounding all SPA components, to guide work at the planning application stage (as opposed to Local Plan-making) which extend well beyond 400m.

On this basis, it is appropriate to differentiate the remaining 100 sites, which are beyond 400m from the SPA, on a light red / amber / yellow / light green colour scale – see the large table at the end of this section. The 'least constrained' site option is 2.5km distant from the SPA.

The histogram below serves to suggest that, outside of the 400m buffer zone, distance to the SPA was not a major factor influencing the SLAA.

Distance of non-permitted deliverable / developable SLAA sites to the SPA



Site of Special Scientific Interest (SSSI)

All of the land designated as SPA is also nationally designated as SSSI. Additionally, the Basingstoke Canal, at the south west extent of the Borough, is designated as a SSSI.

It is difficult to know how best to categorise the performance of site options in respect of distance to a SSSI. On balance, it is considered appropriate to highlight the 12 sites within 50m of a SSSI as **performing poorly**, which includes four (housing) sites in proximity to the Basingstoke Canal SSSI, which includes two sites identified as deliverable or developable by the SLAA, and one site discounted by the SLAA but shortlisted in Section 5.4, above.

36 sites are beyond 1km from a SSSI, such that they stand-out as **performing well**. Of course, for the great majority of these sites (all but five) the nearest SSSI is also designated as SPA, hence the sites are constrained in SPA terms, but it is fair to highlight these sites as performing well on the basis of being relatively distant.

Site of Nature Conservation Importance (SNCI)

Three sites intersect an SNCI, of which one is permitted (Princess Royal Barracks), one is identified as deliverable or developable by the SLAA (although only 3% of the site intersects) and another is discounted. A further nine sites are then adjacent or near adjacent (10m) to an SNCI, of which two are identified as deliverable or developable by the SLAA and the others are discounted. These sites stand-out as **performing poorly**.

37 sites are beyond 400m from an SNCI, such that they stand-out as **performing well**, e.g. on the basis that 400m is a well established easy walking distance (and given that recreational pressure is often a key issue).

Ancient woodland

There is relatively little ancient woodland within the Borough, but there are several notable patches that are not nationally designated (SSSI) or locally designated (SNCI).

One site intersects ancient woodland (Fairoaks) and another is 24m distant (discounted by the SLAA but shortlisted in Section 5.4 of this report). These site stand-out as **performing poorly**.

105 sites are beyond 200m from an ancient woodland, such that they stand-out as **performing well**.

Priority habitat

22 sites significantly intersect priority habitat (>20%), and are judged to stand-out as **performing poorly**. Of these sites, one site is permitted, six are identified as deliverable by the SLAA and a further five are discounted by the SLAA but shortlisted in Section 5.4 of this report.

74 sites do not intersect priority habitat, such that they stand-out as **performing well**.

The table below serves to suggest that intersect with priority habitat was a factor influencing the SLAA.

Tree Preservation Orders

N.B it is recognised that this is not strictly a biodiversity designation, but it warrants consideration nonetheless.

15 sites significantly (>20%) intersect land with TPO designation, and are judged to stand-out as **performing poorly**. Focusing on the ten sites with more than 50% coverage, it is notable that one site is permitted and a further four are identified as developable by the SLAA.

96 sites do not intersect a TPO, such that they stand-out as **performing well**.

Summary of average distance / intersect with biodiversity designations

	Avg distance to biodiversity designations (m)			Avg % intersect with biodiversity designations	
	SPA	SSSI	SNCI	Priority habitat	TPO
Permitted	637	615	260	7.4	20
Deliverable/developable	992	826	318	9.6	7.6
Discounted but shortlisted in Section 5.4	748	702	315	21.2	8.5
Discounted	926	874	311	21	11.1

Historic environment

There is good availability of data for designated assets/areas, and so sites in proximity can be flagged as potentially constrained. However, it is important to recognise that proximity is a very crude indicator of historic environment impact risk. For example, there is a need to take account of topography, recognising that assets such as churches and stately homes are often located on raised land. There is also a need to consider impacts aside from direct impacts to setting, notably impacts associated with increased traffic through historic centres and along historic lanes. For these reasons, GIS analysis of site options is only a relatively minor input to the SA process, specifically the process of defining reasonable growth scenarios for appraisal in Section 5 of this report.

Conservation area

30 sites are within 200m and are judged to stand-out as **performing poorly**. Of these sites nine either intersect or are adjacent (within 10m), of which six are identified as deliverable or developable by the SLAA.

16 sites are more than 2km distant, and so stand-out as **performing well**.

Listed building

It has only been possible to measure distance to 'a listed building', as opposed to measuring distance to each of the three categories of listed building in turn. At the next stage it will be possible to rectify this.

7 sites are within 20m of a listed building and are judged to stand-out as **performing poorly**.

57 sites are more than 200m distant, and so stand-out as **performing well**.

Registered park or garden (RPG)

Two sites are within 50m of an RPG and are judged to stand-out as **performing poorly**. Specifically, both sites are within 20m of Bagshot Park, which is grade 2 listed, and both sites are identified as developable by the SLAA.

Eight further sites are within 400m, and so are flagged as **relatively poorly**.

Scheduled monument

No sites are in proximity to a scheduled monument, with the closest site 392m distant (discounted by the SLAA).

Locally listed buildings

Four sites intersect a locally listed building and are judged to stand-out as **performing poorly**. Three of these sites are identified as developable by the SLAA.

20 further sites are adjacent or within 20m, and so are flagged as performing **relatively poorly**.

Archaeology area

Six sites intersect or are adjacent and so are flagged as performing **relatively poorly**.

Flood risk

Ten sites are identified as **performing poorly** on the basis of intersecting flood zone 3 by more than 20% or flood zone 2 by more than 50%. Of these sites, four are identified as developable by the SLAA.

A further 11 sites intersect the flood zone and so are flagged as performing **relatively poorly**.

Communities

There are a range of relevant GIS datasets; however, there is no available dataset showing the location of GP surgeries. Efforts will be made to gather further data to inform future plan-making and SA.

Town centre

19 sites are either within Camberley town centre (four sites) or within 800m such that they stand-out as **performing well**. A further ten sites are then within 2km, and so are judged to perform **relatively well**.

District or local centre, or neighbourhood parade

40 sites are within 400m such that they stand-out as **performing well**.

19 sites are more than 1km and are judged to stand-out as **performing poorly**. However, it is important to note that several of these sites perform well in respect of proximity to Camberley town centre.

School

It has only been possible to measure distance to 'a school', as opposed to measuring distance to various categories of school (for example, and notably, secondary versus primary). At the next stage it will be possible to rectify this.

30 sites are within 400m such that they stand-out as **performing well**.

6 sites are more than 1.5km and are judged to stand-out as **performing poorly**.

Train station

28 sites are within 400m such that they stand-out as **performing well**.

The remaining 80 sites are placed on a light red / amber / yellow / light green colour scale according to distance – see the large table at the end of this section. Nine sites are beyond 4km from a train station, with the worst performing site 4.5km distant.

Bus stop

There is a need to treat the available dataset showing the location of bus stops with caution, because the level of service can vary greatly and change over time (indeed, it is not uncommon for services to cease entirely).

Three sites are more than 800m and are judged to stand-out as **performing poorly**.

A further 18 sites are beyond 400m and judged to perform **relatively poorly**.

Greenspace

40 sites are within 100m, but do not intersect, such that they stand-out as **performing well**.

69 sites intersect, and so must be flagged as potentially **performing poorly**, and 16 other sites perform poorly on the basis of being located beyond 400m.

Nature reserve

20 sites are within 800m of a National Nature Reserve (Chobham Common; 8 sites) of a Local Nature Reserve (12 sites) and are flagged as **performing well** in that these sites are managed for access, albeit it is recognised that NNRs are also highly sensitive in biodiversity terms (Chobham Common is designated SPA and SAC).

Index of Multiple Deprivation (IMD)

All Super Output Areas (SOAs) nationally are assigned an Index of Multiple Deprivation (IMD) score, and the results can be viewed at: dclgapps.communities.gov.uk/imd/iod_index.html.

16 sites intersect a Super Output Area (SOA) that is associated with a degree of relative deprivation, specifically not within the top 20% of least deprived SOAs nationally. These sites are flagged as **performing well** in that there could be an opportunity for development to support regeneration.

Green Belt

40 sites intersect the Green Belt and so are flagged as performing **relatively poorly**.

Analysis outcomes by site option

The table below includes a row for each of the site options subjected to analysis. The aim is to provide an insight as to the performance of each site in respect of the metrics discussed above, both in absolute and relative terms.

Structure of the table

Sites are firstly grouped by **sub-area**.

Secondly, within each sub-area, sites are grouped according to their '**SA status**' as follows:

- Sites with **planning permission**, including all that feature in the SLAA and select other sites.
- Sites identified as **deliverable or developable** by the SLAA
- Sites discounted by the SLAA but progressed to the **reasonable growth scenarios** (Section 6)
- Other sites **discounted** by the SLAA

Thirdly, within the "Type" column, the one site proposed for **SANG** is highlighted. The analysis is clearly of limited relevance to this site.

Fourthly, within the "# homes" column, sites **above 25 homes** and hence allocated in the Local Plan are highlighted.

With regards to the columns on the right-hand side of the table:

- Sites that stand out as performing well / poorly are assigned a **green or red** in line with the methodology set out in the section above.
- Sites that do not stand-out as performing well / poorly are either assigned a colour on a light-red to light-green **colour scale** (using the 'conditional formatting' function in MS Excel) or assigned **no colour**.

Site options GIS analysis

Ref	Sub area	Name	Status	Area (ha)	Type	# homes (C3)	AQMA	SRN	SPA	SSSI	SNCI	Ancient woodland	Priority habitat	TPO	Conservation area	Listed building	RPG	Locally listed	Archaeology	Flood zone	Town centre	Local centre	School	Train station	Bus stop	Nature reserve	Greenspace	IMD	Green Belt						
181	Bagshot	134 and 136 London Road	Permitted	0.3	C3																														
448		175 London Road	Deliverable	0.3	C3	8																													
407		Highways Farm, 226 London Road	Deliverable	0.4	C3	6																													
247		Bagshot Highway Depot, London Road	Developable	1.0	C3	50																													
408		Land rear of 192-210 London Road	Developable	1.3	C3	20																													
317		The Deans, Bridge Road	Developable	0.2	C3	20																													
714		Seal House, 56 London Road	Developable	0.1	C3	16																													
320		Tanners Yard, London Road	Developable	0.3	C3	9																													
901		212 London Road	Developable	0.4	C3	5																													
736		Grove End	Growth scenarios	4.3	C3																														
812		Swift Lane	Discounted	15	C3																														
446		Land at Notcutts, London Rd & west of Hawkesworth Dr	Discounted	7.4	C3																														
798		Land at Pennyhill, London Road	Discounted	7.3	C3																														

Ref	Sub area	Name	Status	Area (ha)	Type	# homes (C3)	AQMA	SRN	SPA	SSSI	SNCI	Ancient woodland	Priority habitat	TPO	Conservation area	Listed building	RPG	Locally listed	Archaeology	Flood zone	Town centre	Local centre	School	Train station	Bus stop	Nature reserve	Greenspace	IMD	Green Belt			
573	Bisley	317-319 Guildford Road	Deliverable	0.3	C3	17																										
763		Land at Elder Road	Developable	0.2	C3	9																										
236		Land rear of 309-315 Guildford Road	Developable	0.2	C3	6																										
740		Land East of Clews Lane	Growth scenarios	8.2	C3																											
800		The Miles Green Nursery	Growth scenarios	4.7	C3																											
902		Former Bisley FC	Growth scenarios	3.8	C3																											
903		Land South of Church Lane	Growth scenarios	1.8	C3																											
741		Land West of Guildford Road	Discounted	13	C3																											
865	Camberley	84-100 Park Street	Permitted	0.4	C3																											
801		Pinehurst, 141	Deliverable	0.8	C3	44																										
832		Land south of Bridge Road	Deliverable	0.1	C3	5																										
814		London Road Block	Developable	2.6	Mix	550																										
27		Land east of Knoll Road	Developable	2.3	C3	475																										
921		Land East of Park Street, North of Princess Way	Developable	0.4	C3	120																										

Ref	Sub area	Name	Status	Area (ha)	Type	# homes (C3)	AQMA	SRN	SPA	SSSI	SNCI	Ancient woodland	Priority habitat	TPO	Conservation area	Listed building	RPG	Locally listed	Archaeology	Flood zone	Town centre	Local centre	School	Train station	Bus stop	Nature reserve	Greenspace	IMD	Green Belt	
25		Camberley Station, Pembroke Broadway	Developable	0.4	C3	75	Orange	Green	Orange	Green	Green	Green	Green	Green	Green	Red	Green				Green	Green	Red	Orange	Green			Green		
878		Building B, Riverside Way	Developable	0.8	C3	52	Orange	Yellow	Orange	Green	Light Green	Green	Green	Green	Green	Yellow	Green				Red	Light Green	Green	Light Green	Yellow			Green		
240		Camberley Centre, France Hill Drive	Developable	0.9	C3	35	Orange	Green	Orange	Green	Light Green	Green	Green	Green	Green	Red	Green			Red	Green	Light Green	Orange	Green			Green			
21		61-63 London Road	Developable	0.3	C2	32	Orange	Green	Red	Yellow	Light Green	Green	Green	Green	Red	Red	Green			Yellow	Green	Light Green	Light Green	Light Green			Yellow			
833		York Town Car Park	Developable	0.5	C3	27	Yellow	Green	Orange	Light Green	Orange	Green	Green	Green	Green	Red	Orange				Green	Green	Green	Orange	Light Green		Orange	Light Green		
314		Travis Perkins, 280 Gordon Avenue	Developable	0.2	C3	15	Orange	Green	Light Green	Green	Green	Green	Green	Green	Green	Orange	Green				Green	Light Green	Light Green	Light Green			Light Green	Light Green		
295		439-445 London Road	Developable	0.1	C3	15	Yellow	Green	Orange	Light Green	Orange	Green	Green	Green	Green	Red	Orange			Yellow	Yellow	Light Green	Green	Orange	Light Green		Light Green	Light Green		
424		Land rear of 1-47 Sullivan Road	Developable	0.2	C3	14	Orange	Green	Orange	Green	Yellow	Green	Green	Green	Green	Red	Green				Green	Green	Green	Light Green			Red	Light Green		
717		Burwood House Hotel, 15 London Road	Developable	0.2	C3	10	Orange	Green	Red	Light Green	Green	Green	Green	Green	Red	Yellow	Light Green				Green	Light Green	Light Green	Light Green			Green			
49		Peerless site North, Sullivan Road	Developable	0.6	C3	8	Yellow	Green	Orange	Light Green	Orange	Green	Green	Green	Green	Red	Light Green				Green	Light Green	Light Green	Light Green			Red	Light Green		
877		26 Portsmouth Road	Developable	0.2	C3	8	Red	Green	Orange	Green	Green	Green	Green	Green	Green	Yellow	Green				Green	Light Green	Orange	Light Green			Red			
721		Central House, 75-79 Park Street	Developable	0.0	C3	6	Orange	Green	Orange	Green	Light Green	Green	Green	Green	Green	Red	Green				Green	Light Green	Red	Light Green			Yellow			
904		Land at Kings International College, Watchetts Drive	Discounted	12	C3		Red	Light Green	Light Green	Green	Green	Green	Light Green	Green	Light Green	Green	Yellow			Yellow	Light Green	Light Green	Light Green	Light Green			Red	Light Green		
37		Tekels Park	Discounted	4.5	C3		Red	Green	Yellow	Green	Red	Green	Red	Red	Red	Red	Green			Yellow	Green	Light Green	Yellow	Yellow			Red			

Ref	Sub area	Name	Status	Area (ha)	Type	# homes (C3)	AQMA	SRN	SPA	SSSI	SNCI	Ancient woodland	Priority habitat	TPO	Conservation area	Listed building	RPG	Locally listed	Archaeology	Flood zone	Town centre	Local centre	School	Train station	Bus stop	Nature reserve	Greenspace	IMD	Green Belt			
802	Chobham	Four winds, 29 London Road, Camberley	Discounted	0.6	C3		Orange	Green	Orange	Light Green	Green	Green	Red	Red	Orange	Orange				Green	Light Green	Light Green	Light Green	Light Green				Yellow				
500		Church of St Peter, Caesars Camp Road	Discounted	0.3	C3		Orange	Green	Orange	Yellow	Green	Green	Green	Green	Orange	Light Green				Green	Light Green	Light Green	Light Green	Light Green				Red	Light Green			
250		65-85 High Street	Discounted	0.3	C3		Orange	Green	Orange	Green	Green	Green	Green	Green	Orange	Light Green				Green	Light Green	Red	Orange	Light Green				Green				
6		22 Crawley Hill	Discounted	0.3	C3		Red	Green	Yellow	Green	Green	Green	Green	Green	Light Green	Orange	Light Green		Red		Green	Light Green	Red	Light Green	Light Green				Yellow			
804		Land East of Frimley Road, South of London Road	Discounted	0.3	C3		Yellow	Green	Orange	Green	Red	Green	Green	Green	Green	Red	Orange				Green	Light Green	Light Green	Light Green	Light Green				Orange	Light Green		
246		Old Dean Youth Centre, Kingston Road	Discounted	0.2	C3		Orange	Green	Red	Orange	Green	Green	Green	Green	Green	Light Green	Light Green				Green	Light Green	Light Green	Light Green	Light Green				Light Green	Light Green		
1003		St James House, Knoll Road	Discounted	0.2	C3		Orange	Green	Orange	Green	Green	Green	Green	Green	Green	Red	Light Green				Green	Light Green	Red	Orange	Light Green				Green			
1002		31 High Street	Discounted	0.0	C3		Orange	Green	Orange	Green	Light Green	Green	Green	Green	Green	Red	Light Green				Green	Light Green	Red	Orange	Light Green				Light Green			
1001		Chobham Club, 50 Windsor Road	Deliverable	0.3	C3	8	Light Green	Light Green	Red	Light Green	Light Green	Green	Green	Green	Green	Red	Light Green		Yellow		Green		Light Green	Light Green	Orange		Light Green	Green			Yellow	
447		Chobham Rugby Club, Windsor Road	Developable	3.5	C3	91	Light Green	Light Green	Red	Yellow	Orange	Green	Green	Green	Green	Red	Light Green		Yellow		Green		Light Green	Light Green	Orange		Light Green	Red	Light Green		Yellow	
548	Broadford, Castle Grove Road	Developable + Growth scenarios	2.2	C3	15	Light Green	Red	Yellow	Green	Red	Green	Red	Light Green	Green	Red	Light Green			Yellow	Red		Light Green	Light Green	Light Green				Green			Yellow	
950	Fairoaks	Growth scenarios	153	Mix		Light Green	Red	Red	Orange	Red	Red	Light Green	Green	Green	Red	Light Green				Yellow		Red	Orange	Light Green				Red			Yellow	
238	Mincing Lane Nursery, Mincing Lane	Growth scenarios	1.6	C3		Light Green	Green	Red	Orange	Red	Green	Red	Light Green	Green	Red	Light Green		Yellow		Green		Light Green	Light Green	Orange		Light Green	Green	Light Green			Yellow	
546	Land rear of The Grange	Growth scenarios	1.5	C3		Light Green	Orange	Orange	Light Green	Light Green	Green	Red	Red	Red	Red	Light Green			Yellow	Yellow		Green	Green	Orange				Light Green			Yellow	

Ref	Sub area	Name	Status	Area (ha)	Type	# homes (C3)	AQMA	SRN	SPA	SSSI	SNCI	Ancient woodland	Priority habitat	TPO	Conservation area	Listed building	RPG	Locally listed	Archaeology	Flood zone	Town centre	Local centre	School	Train station	Bus stop	Nature reserve	Greenspace	IMD	Green Belt
597		Land northwest of The Grange	Growth scenarios	1.5	C3																								
918		9 The Avenue	Growth scenarios	0.7	C3																								
916		7 The Avenue	Growth scenarios	0.2	C3																								
543		Round Pond Nurseries, Windsor Road	Discounted	8.3	C3																								
751		3 Chobham Lane	Discounted	7.6	C3																								
414		Land north of Lakeside Drive	Discounted	3.5	C3																								
510		Land at Flexlands Farm, Station Road	Discounted	2.3	C3																								
917		Land Between 46 - 62 Mincing Lane	Discounted	1.8	C3																								
843		Former Plants to Go, Bagshot Road	Discounted	1.6	C3																								
409		Land at Latchetts Mead, Green Lane	Discounted	1.0	C3																								
919		Riverside Nursery, Philpot Lane	Discounted	0.9	C3																								
835		Land East of Lovelands Lane	Discounted	0.4	C3																								
567	Deepcut	Princess Royal Barracks 1, Brunswick Road	Permitted	111	Mix																								
887	Deepcut	Land at Loen, St Catherines Road, Frimley Green	Deliverable	4.4	C2	10																							

Ref	Sub area	Name	Status	Area (ha)	Type	# homes (C3)	AQMA	SRN	SPA	SSSI	SNCI	Ancient woodland	Priority habitat	TPO	Conservation area	Listed building	RPG	Locally listed	Archaeology	Flood zone	Town centre	Local centre	School	Train station	Bus stop	Nature reserve	Greenspace	IMD	Green Belt			
552	Frimley	Land at Frimhurst Farm, Deepcut Bridge Road	Developable	4.9	C3	65																										
757		Land north of Guildford Road	Developable	5.5	C3	21																										
920		The Grange, St Catherines Road	Developable	2.9	C3	17																										
846		Former Premier Site	Developable	0.4	C3	10																										
922		Ballydown, Lake Road	Developable	0.9	C3	5																										
504		Land North of Lake Road	Developable	0.5	C3	5																										
926		Land adj to Wykeham Park House, St Catherines Road	Developable	0.3	C3	5																										
375		East of St Catherine Rd, north of Lake Rd, west of Bellew Rd	Deliverable	30		SANG																										
923		Land East of St Cross Road & North of Lake Road	Growth scenarios	0.4	C3																											
836		Former Depot, Pricess Royal Barracks	Discounted	5.3	C3																											
906		Land at Guildford Road	Discounted	0.6	C3																											
378		51-57 Deepcut Bridge Road	Discounted	0.1	C3																											
907		Sir William Siemens Square, Frimley	Developable	3.1	C3	200																										
837		Former Playing Field Lane	Developable	0.6	C2	10																										

Ref	Sub area	Name	Status	Area (ha)	Type	# homes (C3)	AQMA	SRN	SPA	SSSI	SNCI	Ancient woodland	Priority habitat	TPO	Conservation area	Listed building	RPG	Locally listed	Archaeology	Flood zone	Town centre	Local centre	School	Train station	Bus stop	Nature reserve	Greenspace	IMD	Green Belt
882		Land Rear of Parade	Developable	0.3	C3	5	Orange	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Yellow	Yellow	Green		Green	Yellow	Green			Orange		
830		Land at Pineridge, Old Bisley Road, Camberley	Discounted	102	C3		Orange	Green	Red	Red	Red	Green	Green	Red	Green	Green				Green		Yellow	Green	Yellow			Red		
566		34 & 36 Station Road	Discounted	0.1	C3		Orange	Orange	Green	Green	Yellow	Green	Green	Green	Green	Green	Yellow			Yellow		Green	Yellow	Green			Yellow		
557		Land west of Sturt Road	Deliverable (permitted)	3.4	C3	160	Yellow	Green	Red	Orange	Red	Green	Green	Green	Green	Red	Red			Yellow		Green	Green	Green			Green		
329		251 Frimley Green Road	Developable	0.2	C3	17	Yellow	Green	Orange	Orange	Green	Green	Green	Green	Green	Red	Green			Green		Green	Green	Yellow			Green		
512		SC Johnson, Frimley Green Road	Discounted	27	C3		Orange	Orange	Yellow	Green	Red	Green	Red	Green	Green	Yellow	Green			Red		Green	Green	Green					
299	Frimley Green	Land at East Curve, Sturt Road	Discounted	1.5	C3		Yellow	Green	Orange	Yellow	Red	Green	Green	Green	Green	Red	Green			Green		Green	Green	Green			Yellow		
195		214-216 Frimley Green Road	Discounted	0.2	C3		Yellow	Green	Orange	Yellow	Green	Green	Green	Green	Green	Red	Yellow			Green		Green	Green	Green			Green		
908		103 - 109 Guildford Road	Deliverable	0.4	C3	17	Green	Orange	Red	Yellow	Green	Green	Green	Green	Green	Yellow	Red			Green		Green	Yellow	Yellow			Orange		
909	Lightwater	Land South of Sundew Close, Guildford Road	Discounted	1.1	C3		Green	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green			Green		Yellow	Yellow	Orange	Green	Green	Green		
910		Land Rear of 160 - 162 MacDonald Road	Discounted	0.8	C3		Yellow	Green	Red	Red	Red	Orange	Red	Red	Green	Green	Green			Green		Red	Green	Yellow			Green		
911		Land rear of 164 MadDonald Road	Discounted	0.2	C3		Yellow	Green	Red	Red	Orange	Green	Red	Red	Green	Green	Green			Green		Red	Green	Yellow			Green		
912	Mytchett	Land adjacent to Sherrard Way	Developable	4.0	C3	16	Green	Red	Orange	Green	Yellow	Green	Green	Green	Green	Orange	Green			Red		Green	Green	Green			Orange		
1000		10 Willow Close	Developable	0.5	C3	7	Green	Yellow	Orange	Green	Red	Green	Red	Green	Green	Orange	Green			Green		Green	Green	Green			Green		

Ref	Sub area	Name	Status	Area (ha)	Type	# homes (C3)	AQMA	SRN	SPA	SSSI	SNCI	Ancient woodland	Priority habitat	TPO	Conservation area	Listed building	RPG	Locally listed	Archaeology	Flood zone	Town centre	Local centre	School	Train station	Bus stop	Nature reserve	Greenspace	IMD	Green Belt						
178	West End	Land east of Benner Lane (partial Housing Reserve Site)	Developable	7.6	C3	73																													
840		Land at 32 Benner lane	Developable	0.4	C3	10																													
153		Land South of Fenns Lane	Developable + Growth scenarios	6.4	C3	7																													
799		Land North of Old House Lane	Developable + Growth scenarios	1.8	C3	6																													
813		Land at Oak Farm House	Growth scenarios	14	C3																														
913		Land South of Beldam Bridge Road	Growth scenarios	2.5	C3																														
374		Land at Pankhurst Farm	Discounted	9.5	C3																														
914	West End	B/n Little Down & Whitedown Cottage, Bagshot Rd	Discounted	1.6	C3																														
816		Gazes, Old House Lane, Bisley	Discounted	0.3	C3																														
177	Windlesham	Housing Reserve Site, Heathpark Drive	Permitted	8.1	C3																														
1004		St Margarets Cottage & The Ferns, Woodlands Lane	Deliverable	0.9	C3	20																													
844		Land at Chamless	Developable	0.8	C3	9																													
834		Broadway Green Farm, Broadway Road	Developable	2.8	C3	7																													
809		Land East of Snows Ride	Growth scenarios	16	C3																														

Ref	Sub area	Name	Status	Area (ha)	Type	# homes (C3)	AQMA	SRN	SPA	SSSI	SNCI	Ancient woodland	Priority habitat	TPO	Conservation area	Listed building	RPG	Locally listed	Archaeology	Flood zone	Town centre	Local centre	School	Train station	Bus stop	Nature reserve	Greenspace	IMD	Green Belt	
609		Land north Reserve Site, Heathpark Drive	Growth scenarios	2.8	C3		Green	Green	Red	Green	Green	Green	Green	Green	Red	Green				Green		Green	Red	Yellow	Yellow		Red		Yellow	
915		Land rear of 1-31 Broadley Green	Growth scenarios	0.6	C3		Green		Yellow	Green	Green	Green	Green	Green	Red	Green				Green		Green	Red	Green				Orange		Yellow
445		Windlesham Garden Centre, London Road	Discounted	4.1	C3		Green		Yellow	Green	Green	Green	Green	Green	Green	Green				Green		Red	Yellow	Green			Red		Yellow	
276		Land East of Snows Ride and Hatton Hill	Discounted	3.2	C3		Green		Yellow	Green	Green	Green	Green	Green	Red	Green				Green		Red	Green	Yellow			Red		Yellow	
1005		Meadow Farm, Kennel Lane	Discounted	2.6	C3		Green		Yellow	Green	Green	Green	Green	Green	Red	Red		Yellow		Green		Green	Green	Green			Green		Yellow	
765		Windlesham South Garage, London Road	Discounted	0.3	C3		Green		Yellow	Green	Green	Green	Green	Green	Green	Green				Green		Red	Green	Yellow			Red		Yellow	