

Sustainability Appraisal (SA) of the Surrey Heath Local Plan

Interim SA Report Non-technical Summary

February 2022



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Introduction

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Surrey Heath Local Plan.

Once in place, the Local Plan will set a strategy for growth and change for the period to 2038, allocate sites to deliver the strategy and establish the policies against which planning applications will be determined.

SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. Local Plans must be subject to SA.

Central to the SA process is preparation of an SA Report for publication alongside the draft plan. At the current time, an early draft version of the Local Plan is published for consultation, under Regulation 18 of the Local Planning Regulations, and an 'Interim' SA Report is published alongside.

This is the Non-technical Summary (NTS) of the Interim SA Report.

Structure of the Interim SA Report / this NTS

SA reporting essentially involves answering the following questions in turn:

1) What has plan-making / SA involved **up to this point**?

- including in relation to 'reasonable alternatives'.

2) What are the SA findings **at this stage**?

- i.e. in relation to the draft plan.

3) What happens **next**?

Each of these questions is answered in turn below. Firstly though there is a need to set the scene further by answering the question: *What's the scope of the SA?*

What's the scope of the SA?

The scope of the SA is reflected in a list of topics and objectives. Taken together, this list provides a methodological 'framework' for appraisal.

Table A: The SA framework

Topic	Objectives
Accessibility [to community infrastructure]	<ul style="list-style-type: none"> Improve opportunities for access to education, employment, recreation, health, community services and cultural opportunities for all sections of the community Sustain and enhance the viability and vitality of town, district and local centres Improve the education and skills of the local population Maintain and improve cultural, social and leisure provision
Air / env quality	<ul style="list-style-type: none"> Ensure air quality continues to improve in line with national and/or WHO global targets Reduce noise pollution
Biodiversity	<ul style="list-style-type: none"> Conserve and enhance the Borough's biodiversity Ensure the protection of the Special Protection Areas (SPAs)
Climate change adaptation	<ul style="list-style-type: none"> Minimise the risk of flooding Encourage reduced water consumption
Climate change mitigation	<ul style="list-style-type: none"> Reduce greenhouse gas emissions Increase energy efficiency and increase the use of renewable energy Encourage the use of more sustainable modes of transport (active and public) and reduce traffic congestion
Communities and health	<ul style="list-style-type: none"> Improve the population's health Improve the education and skills of the local population Reduce crime, fear of crime and social exclusion Encourage the enjoyment of the countryside, open spaces and local biodiversity Sustain and enhance the viability and vitality of town, district and local centres

Topic	Objectives
Economy and employment	<ul style="list-style-type: none"> • Support inclusive and diverse economic growth • Maintain stable levels of employment in the Borough • Support existing business structure and businesses • Sustain and enhance the viability and vitality of town, district and local centres
Heritage	<ul style="list-style-type: none"> • Protect and where appropriate enhance the landscape, buildings, sites and features of archaeological, historical or architectural interest and their settings
Housing	<ul style="list-style-type: none"> • Meet identified housing need
Landscape	<ul style="list-style-type: none"> • Protect and where appropriate enhance the landscape, buildings, sites and features of archaeological, historical or architectural interest and their settings • Maintain and enhance the quality of countryside, Green Belt and open space areas
Land, soils and resources	<ul style="list-style-type: none"> • Make the best use of previously developed land (PDL) and existing buildings • Reduce contamination and safeguard soil quality and quantity • Reduce generation of waste and maximise re-use and recycling
Transport	<ul style="list-style-type: none"> • Encourage the use of more sustainable modes of transport (public transport/cycling/ walking) and reduce traffic congestion
Water	<ul style="list-style-type: none"> • Maintain and improve the quality of water resources • Encourage reduced water consumption

Plan-making / SA up to this point

An important element of the required SA process involves appraising ‘reasonable alternatives’ in time to inform development of the draft plan, and then publishing information on reasonable alternatives for consultation alongside the draft plan.

As such, Part 1 of the Interim SA Report explains how work was undertaken, over the period 2019 to 2022, to develop and appraise a reasonable range of “growth scenarios”, essentially in the form of alternative key diagrams.

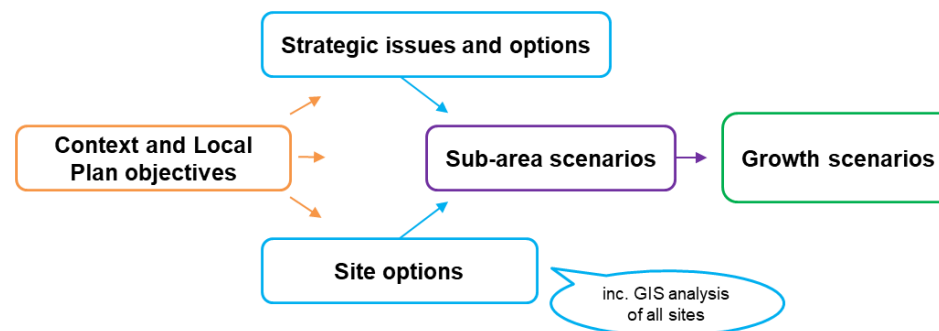
In short, the process involved:

- establishing growth scenarios;
- appraising growth scenarios; and then
- feeding-back to inform the preparation of the draft plan.

Establishing growth scenarios

The aim here is to explain the process of establishing reasonable growth scenarios for appraisal. Figure A provides an overview.

Figure A: Establishing growth scenarios – process overview



Context and Local Plan objectives

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

Draft plan objectives were presented in the Issues and Options / Preferred Options consultation document in 2018, and then were subjected to minor adjustments. Plan objectives are presented in Section 1 of the current consultation document.

All evidence gathered to date, including through consultation and appraisal, fed into work to define reasonable growth scenarios for appraisal over the period 2019 to 2021.

Strategic issues and options

There is a need to consider:

- **Quanta** (*how much?*) – Surrey Heath Borough is in a somewhat unusual situation, in that the default option for the Local Plan is not to set the housing requirement at Local Housing Need (LHN), which is 327 dwellings per annum (dpa) (6,213 homes in total over the 19-year plan period), but rather an adjusted average housing need figure of 299 dpa (5,680 homes in total over the plan period). This is due to the adopted Hart Local Plan providing for unmet needs from Surrey Heath.

As such, reasonable growth scenarios should be primarily focused on providing for 299 dpa / 5,680 homes in total. Given the extent of Green Belt and SPA constraints there is also a clear strategic justification for exploring lower-growth scenarios, subject to detailed consideration of capacity/supply options, as discussed below.

With regard to higher growth scenarios, the constraints affecting Surrey Heath serve as a reason to suggest that these should be ruled out as unreasonable. However, on the other hand, the evidence on affordable housing needs serves as a reason for giving further consideration to the possibility of setting the housing requirement at a figure above 299 dpa. The matter of precise quanta figures to reflect across the reasonable growth scenarios is returned to below, subsequent to consideration of broad distribution options, site options and sub-area scenarios.

- **Broad distribution** (*where?*) – Section 5.2 of the main report presents a review of key evidence, in broad chronological order, beginning with a review of the Capacity Study prepared in 2018, which served as evidence to inform the Issues and Options / Preferred Options consultation document (2018) and, in turn, a decision that the Hart Local Plan should provide for unmet need from Surrey Heath.

Section 5.2 of the main report concludes by presenting a summary of key broad distribution issues/options to feed into work to define reasonable growth scenarios:

- There are clear arguments for directing housing growth to **Camberley town centre**, both from a perspective of reducing pressure on the Green Belt and countryside beyond the Green Belt (CBGB), but also from a perspective of realising town centre regeneration and decarbonisation opportunities.
- The second sequentially preferable location for growth is clearly the **wider urban area** in the west of the Borough and within the built-up areas of villages, because directing growth here will serve to reduce pressure on the Green Belt and CBGB. There are no ‘headline’ strategic growth-related opportunities, but local-level opportunities exist, for example in terms of improving walking/cycling connectivity.
- The third sequentially preferable location for growth, in accordance with national policy, is the **CBGB**, with a view to minimising pressure on the Green Belt. There is also a strategic opportunity, in that this part of the Borough is well-connected to the main urban area. However, on the other hand, there is a need to consider the value and sensitivity of the CBGB, both from an environmental perspective (most notably given proximity/links to the Thames Basin Heaths Special Protection Area, TBHSPA) and from a communities perspective, in that the countryside here will tend to be accessible or otherwise valued by residents of the western urban area. A high proportion of the CBGB is subject to ‘absolute’ constraint, in that it falls within the TBHSPA 400m buffer, and much of the land outside of the buffer is locally designated as a Site of Importance for Nature Conservation (SNCI).
- The least sequentially preferable broad location for growth in the Borough (aside from areas subject to absolute constraints) is the **Green Belt**. Green Belt release would require demonstration of exceptional circumstances, taking into account the degree to which the land in question makes a contribution to the defined Green Belt purposes and the need to promote “sustainable patterns of development” (NPPF para 142). When considering ‘sustainable patterns of development’ there can be the potential to take account of growth opportunities (e.g. provision of community infrastructure to meet a need; or supporting a district or local centre); however, the NPPF emphasises that: “*Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport.*” It is for these reasons, and also mindful of the stretching nature of the Borough’s (adjusted) LHN figure and limited potential supply from non-Green Belt locations, that the Council has undertaken detailed Green Belt Review work, which has included a focus on examining brownfield land options and also the relative transport connectivity of Green Belt sites / land parcels. The Green Belt / edge of Green Belt (Bagshot) settlements are subject to a range of

non-Green Belt constraints, including in respect of: TBHSPA proximity, most notably land to the west of Bagshot, West End and Bisley, and land to the north of Chobham; flood risk and sensitive river valley environments (landscape, heritage, access, water quality), including Chobham and land between West End and Bisley; the historic environment, including at Chobham and (land to the west of) Windlesham, but also with valued assets, clusters of assets and historic landscapes elsewhere; transport connectivity, for example, Chobham and Windlesham have relatively poor bus connectivity; and traffic / road infrastructure, e.g. the A319/A3046 junction within Chobham village centre conservation area is sensitive, and another clear consideration is use of the M3 for local journeys ('junction hopping'). There are no clear and obvious strategic growth opportunities, but potentially some that might be explored further, e.g. in respect of access to a primary school and strategic planning for green and blue infrastructure.

- Another broad locational consideration relates to the matter of concentrating growth at '**strategic**' sites versus dispersing growth across smaller sites, where strategic sites are those with capacity in the several hundreds or thousands of homes, and associated with economies of scale that enable delivery of a good mix of uses (also a good mix of homes in terms of type, size and tenure), potentially to include employment land, and/or support new or upgraded strategic infrastructure. Growth scenarios with a focus on one or more strategic sites can tend to be associated with a range of benefits, for example from a perspective of infrastructure capacity, place-making and decarbonisation; however, strategic sites also give rise to a range of issues, including delivery risk, e.g. because of required infrastructure. Strategic growth options in the Surrey Heath context are relatively limited (e.g. in comparison to nearby Wokingham Borough), aside from the opportunity within Camberley Town Centre. However, one new settlement option exists, in the form of Fairoaks Airport, which is discussed further below.
- Regardless of whether there is support for one or more strategic sites, there is a need to support **a mix of site types and a degree of dispersal** (mindful of the settlement hierarchy) in order to ensure a robust housing supply trajectory (thereby maintaining a five year housing land supply, as measured against the housing requirement) and meet very local housing needs (albeit these are unquantified).
- There is also a need to consider sites suited to meeting **wider needs**, including for employment land (informed by the Employment Land Technical Paper Update, as discussed above), Gypsy and Traveller and Travelling Show People pitches/plots and sites (informed by the Accommodation Assessment) and specialist housing (informed by the Housing Needs Assessment).

Site options

The primary mechanism for considering site options in isolation is the Strategic Land Availability Assessment (SLAA) led by SHBC Officers, which assessed a total of 113 sites identified through a Call for Sites and targeted correspondence with landowners (informed by a Countryside Capacity Study, which examined land parcels within the CBGB). Another important input was the range of past and ongoing detailed workstreams examining issues and options for Camberley Town Centre, which are feeding in not only to the SLAA and Local Plan, but also a forthcoming corporate Camberley Town Centre Strategy.

The SLAA places all (non-permitted) site options into one of three categories:

- Deliverable (able to deliver in the first five years of the plan period) – a total of 10 site options are identified as deliverable, with a total identified capacity of 295 homes.
- Developable (able to deliver in the latter years of the plan period) – a total of 44 site options are identified as deliverable, with a total identified capacity of 2,178 homes.
- Discounted – sites judged not to be deliverable or developable.

With regards to the deliverable and developable sites, there is *relatively* limited need to scrutinise the conclusions of the SLAA through the appraisal of reasonable growth scenarios. With regards to discounted sites, 28 of these are discounted on account of being located within the Green Belt, and these sites *do* warrant close scrutiny, mindful of the stretching nature of the 'quanta' options discussed above. All discounted Green Belt sites are discussed in Section 5.4 of the main report, with a view to identifying those that should be feature within reasonable growth scenarios. Just one of the discounted Green Belt sites has the potential to deliver a strategic scheme, namely Fairoaks Airport.

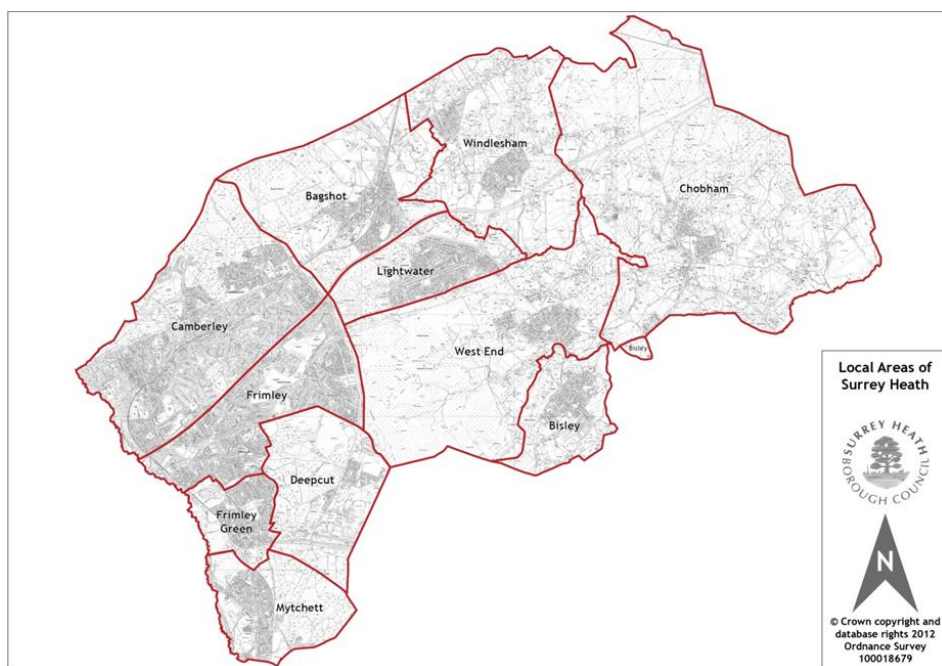
With regards to discounted sites outside of the Green Belt, these are discounted for clear cut planning reasons (e.g. availability; within the 400m TBHSPA buffer zone), such that they do not require detailed scrutiny. However, one such site warrants particular mention, namely Site 830 (Land at Pine Ridge Golf Course, Deepcut, or 'Pine Ridge'), because whilst it is currently unavailable, it *could potentially* (if made available and determined to be suitable for allocation) deliver a strategic urban extension to the main urban area.

Finally, as a means of providing supplementary evidence on site options, Appendix V of the main report presents the findings of an AECOM-led quantitative GIS-based exercise, involving examining the spatial relationship between all site options and a range of constraint/push (e.g. biodiversity designations) and opportunity/pull (e.g. schools) features for which data is available in digitally mapped form for the Borough as a whole. The limited nature of the analysis is such that it does not enable overall conclusions to be reached on the merits of each site (unlike the SLAA); however, it is nonetheless a useful input.

Sub-area scenarios

The next step was to draw upon understanding of strategic and site-specific issues and options to establish growth scenarios for each of the Borough's 12 sub-areas in turn. This is the focus of Section 5.4 within the main report. Specifically, consideration is given to the 11 areas shown in the figure below, plus Camberley town centre.

Figure B: Sub-areas within the borough



For each sub-area the aim was to arrive at a conclusion on the sub-area growth scenarios that should be taken forward to the final step in the overall process (as summarised in Figure A), which sees the sub-area growth scenarios combined into a single set of borough-wide growth scenarios. Ultimately, the conclusion was that:

- For seven sub-areas, namely those in the west of the Borough plus Lightwater, only one scenario needs to be reflected across the borough-wide growth scenarios (i.e. the approach to growth can reasonably be held constant), specifically one involving supply from all deliverable/developable SLAA sites. Section 5.4 reaches this conclusion 'on balance' for several areas, notably Camberley town centre, Deepcut and Mytchett.

- For four of the remaining five sub-areas there are two reasonable growth scenarios to reflect, specifically: 1) supply from all deliverable/developable SLAA sites; and 2) additional supply, over-and-above (1), from one or more small Green Belt sites.
- For Chobham there are three reasonable growth scenarios to reflect, specifically: 1) supply from all deliverable/developable SLAA sites; 2) additional supply, over-and-above (1), from one or more small Green Belt sites; and 3) additional supply, over-and-above (1), from Fair Oaks Airport, specifically, support for a Garden Village with a capacity of 'at least 1,500 homes', of which 1,000 would deliver in the plan period.

Table B: Reasonable sub-area scenarios

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

* completions are sites already delivered since the start of the plan-period; commitments are sites with planning permission; windfall supply will come from sites that are not in the SLAA because they are not yet known of or are too small to be identified in the SLAA.

Growth scenarios for appraisal

The final task was to draw together the understanding generated in order to arrive at a single set of reasonable borough-wide growth scenarios for appraisal. In practice, this meant exploring ways of **combining the sub-area scenarios**, also mindful of housing supply from completions, commitments and windfall.

Total supply from completions, commitments and windfall is 3,609 homes, which is a figure ~2,070 homes short of the **5,680 homes** 'adjusted housing need figure' and the housing requirement figure that reasonable growth scenarios should be primarily focused on.

Additionally, there is a need to ensure a **supply buffer**, which means ensuring a total supply in excess of the requirement. As such, there is a need to primarily focus on combinations of sub area scenarios that would deliver *in excess of* 2,070 homes.

With regards to **lower growth** scenarios, as discussed, there is a strategic argument for exploring scenarios of this nature. However, having gone through a process of exploring site options and sub-area scenarios, the conclusion is that there is no reasonable need to define and appraise lower growth scenarios. The minimum number of homes achieved by combining the sub-area scenarios (2,473 homes) is comfortably in excess of 2,070.

With regards to **higher growth** scenarios, there is a strategic, or 'top down', argument for exploring scenarios of this nature and 'bottom up' work serves to confirm this argument.

The following bullet points explain the process of combining sub-area scenarios:

- The starting point is a borough-wide scenario comprising Scenario 1 for each sub-area. Total potential supply would be **6,082 homes** (3,609 + 2,473), which is a figure 7% above the adjusted housing need figure (i.e. there would be a 7% 'supply buffer'). This is borough-wide reasonable growth scenario 1.
- Reasonable growth scenario 2 is then naturally scenario 1 plus "~800 homes at some or all of the 18 Green Belt site options shortlisted in Section 5.4. of the main report". Under this scenario the total potential supply would be 6,082 + 800 homes = **6,882 homes**, which is a figure 21% above the average adjusted housing need.
- Reasonable growth scenario 3 is then naturally scenario 1 plus additional allocation of Fairoaks Airport (or 'Fairoaks'). Fairoaks is associated with a range of issues, but does include an element of PDL, and is being promoted as a Garden Village (GV). Total capacity of the site, on the basis of latest work completed by the site promoters, is "at least 1,500 homes", but a safe assumption (given delivery risks and uncertainties) is that ~1,000 homes would come forward in the plan period. Therefore under this scenario the total potential supply in the plan period would be 6,082 + 1,000 homes = **7,082 homes**, which is a figure 25% above the average adjusted housing need figure.

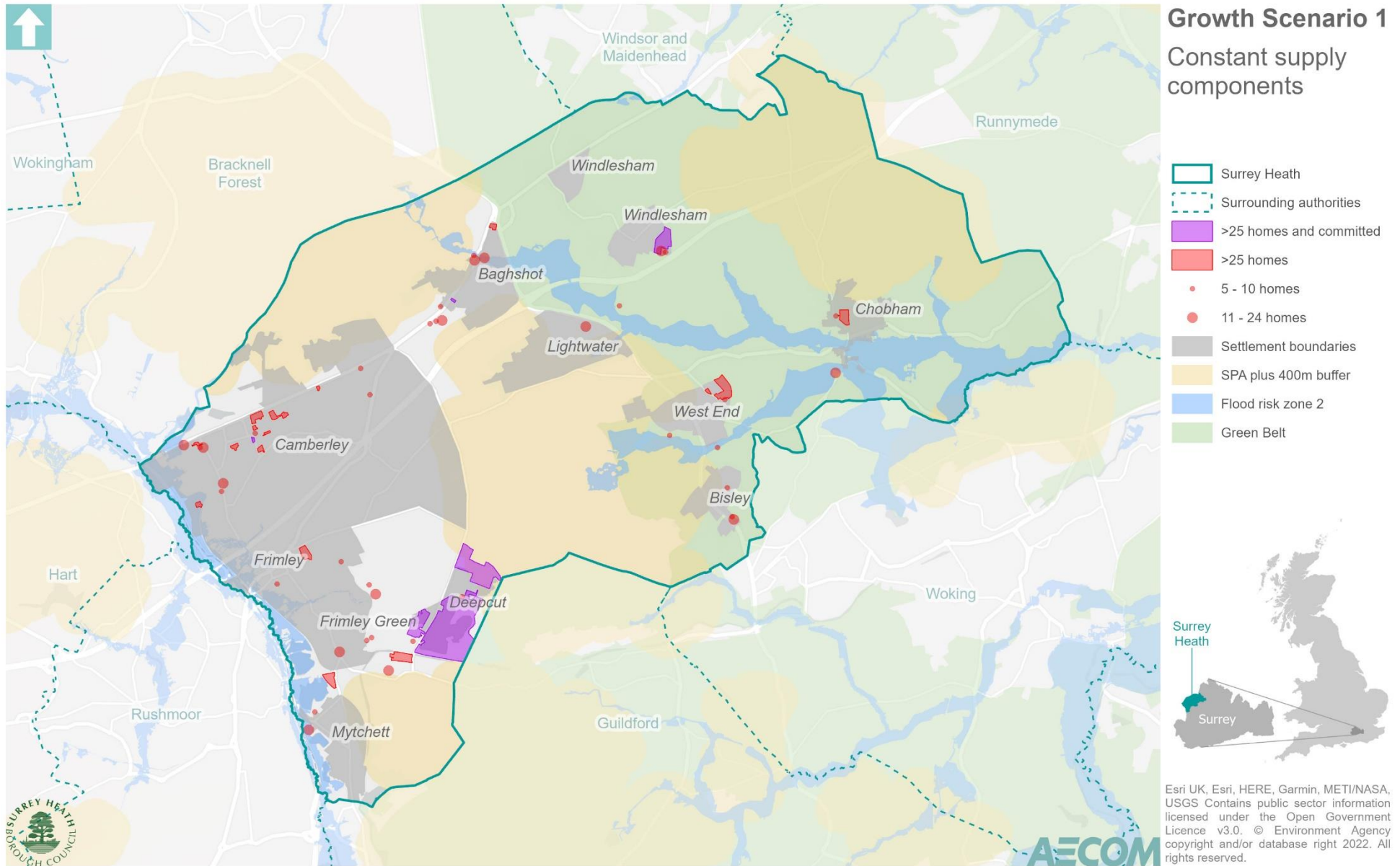
The above discussion leads to three reasonable growth scenarios, which are presented in Table C and across the three subsequent maps. Final points to note are as follows:

- It is important to be clear that Scenario 2 is defined without specifying precisely which Green Belt sites would be allocated and the precise capacity of each. This is a limitation, but is an unavoidable reflection of the stage of the plan making process.
- Under Scenarios 2 and 3 there is a question-mark regarding whether the housing requirement (i.e. the figure against which the Local Plan performance is monitored and evaluated) would be *as per* scenario 1, with a higher supply buffer, or whether the housing requirement would be increased (a 'true' higher growth strategy).

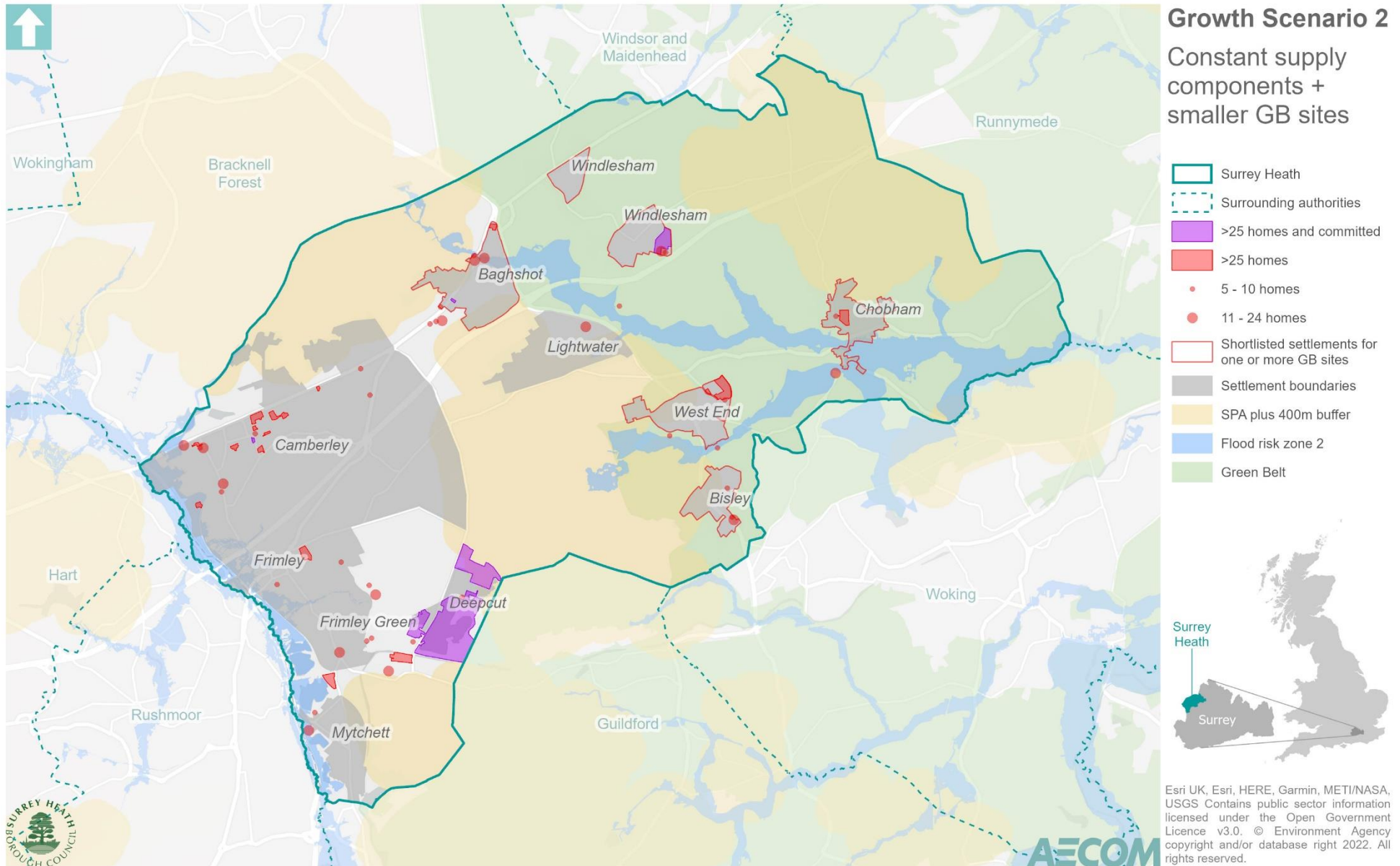
Table C: The reasonable growth scenarios (with constants greyed-out)

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

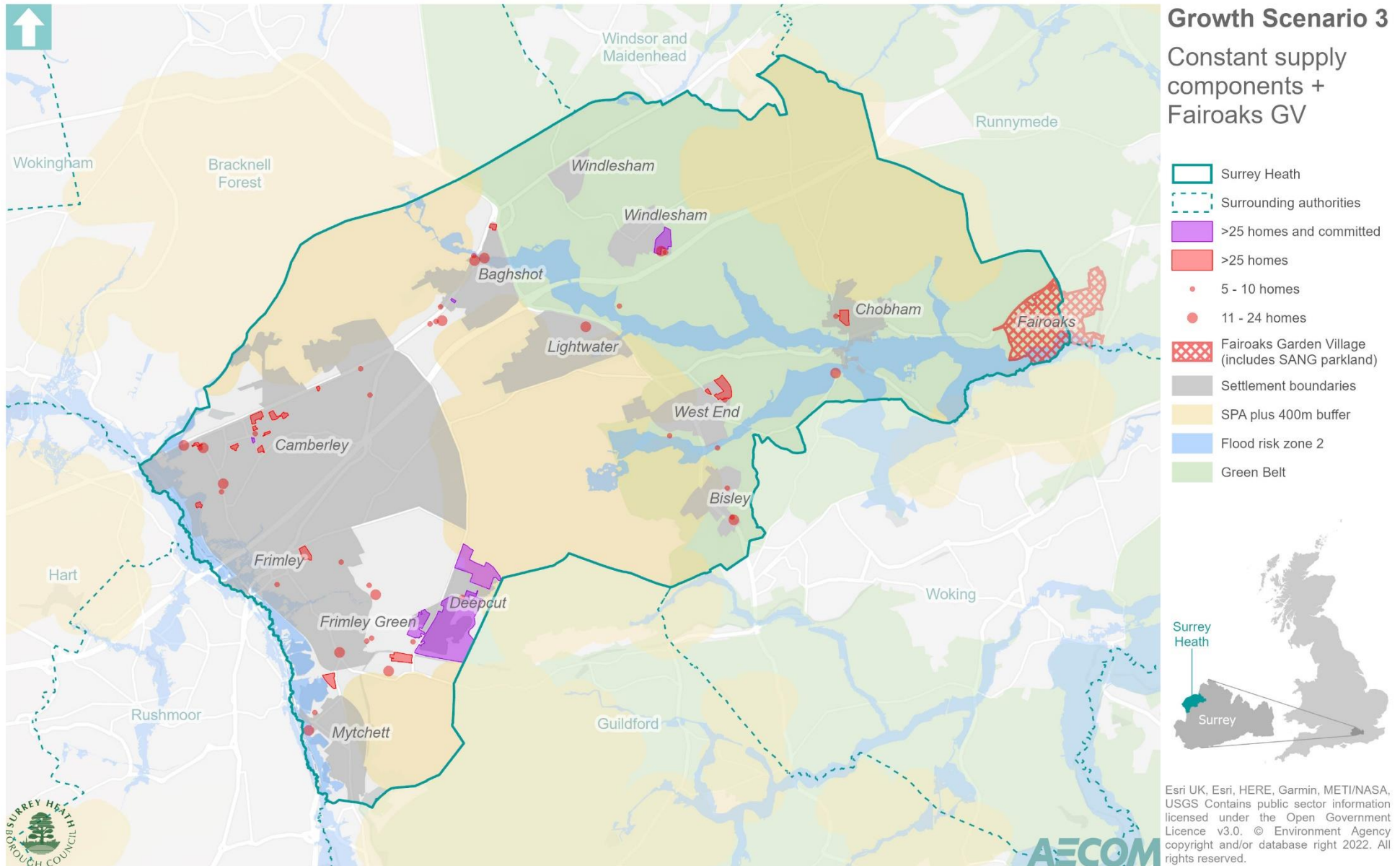
Reasonable growth scenario 1: Constant supply components (i.e. all sites identified as deliverable or developable by the SLAA)



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



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



Growth scenarios appraisal

Summary appraisal findings are presented within the table below. Within each row (i.e. for each of the topics that comprise the SA framework) the columns to the right hand side seek to both rank the scenarios in order of performance and categorise the performance of each scenario in terms of 'significant effects' using **red** / **amber** / **light green** / **green**.

Growth scenarios appraisal findings

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

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

Finally, with regards to **Scenario 3**, the appraisal highlights a mixed picture, with this scenario preferable to Scenario 1 from a 'housing' and a 'communities' perspective, given affordable housing needs and a clear place-making opportunity (also, there are arguments in favour of Scenario 3 from an 'economy and employment perspective), but giving rise to concerns over-and-above Scenario 1 in several other respects. Strategic growth locations can give rise to considerable opportunities to realise sustainability objectives, over-and-above piecemeal expansion of settlements. However, the proposed garden village is relatively small in scale, and there are a range of locational issues and constraints. There might feasibly be potential to address the locational challenges, but there would be costs and trade-offs involved, which would need to be fully explored.

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

The preferred growth scenario

It is not the role of the appraisal to arrive at a conclusion on which of the reasonable growth scenarios is best, or ‘most sustainable’ overall. Rather, it is the role of the plan-making authority to arrive at that conclusion, informed by the appraisal. The following statement explains SHBC Officers’ reasons for supporting **Growth Scenario 1**:

The appraisal shows Scenario 1 to perform well in a number of respects, ranking highest or equally highest for the majority of SA topics, specifically: Accessibility; Air Quality; Biodiversity; Climate change adaptation and mitigation; Economy and employment; Historic environment; Land, soils and resources; Landscape; Transport and Water.

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

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

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

SA findings at this stage

Part 2 of the Interim SA Report answers the question “what are appraisal findings at this stage” by presenting an appraisal of the Draft Local Plan. The following is a summary.

Accessibility

The reconfiguration and regeneration of Camberley town centre represents a considerable opportunity to maintain and enhance the town centre’s community function, ensuring that it retains its role as the primary community infrastructure hub within the Borough, is an attractive place to visit and spend time and is easily permeable and navigable on foot. All five town centre allocations represent important components of the overall strategy (albeit one of these is already committed, namely 84-100 Park Street), in particular the two largest allocations, namely London Road Block (which will see an underused site in a town centre core location become a new central focus of the centre) and Knoll Road (which is at the edge of the town centre, and currently comprises a range of uses). Elsewhere there are limited community infrastructure opportunities set to be realised through the proposed growth strategy, and a further consideration is the proposal is to support housing growth at several small sites not linked to settlement boundaries, and hence in less accessible locations, although these sites together comprise only a small element of the overall strategy. With regards to site specific policies, there is a clear focus on use mix and realising opportunities for increasing pedestrian permeability and improving offsite walking/cycling links, which is supported. With regards to borough-wide thematic development management policies, numerous policies are supportive of accessibility objectives, with Policy CTC1 (Camberley Town Centre) considered to be particularly important. Overall, **positive effects of limited or uncertain significance** are predicted. It is worth highlighting that benefits will largely be felt in the long term, given the time that the town centre sites will take to come forward, hence it will be important to maintain a focus on ‘easy win’ opportunities for supporting the town centre in the shorter term.

Air and wider environmental quality

Ahead of transport modelling it is not possible to confirm whether or not the proposed growth strategy will lead to increased traffic through a known air pollution hotspot (which principally means an AQMA). However, early indications are that issues/impacts are limited, mindful that many areas experiencing problematic air pollution are set to see an improving situation over the plan period – all other things being equal – due to the national switch-over to electric vehicles (although issues with particulates will remain, including from brake, tyre and road wear, mindful of heavier EVs).

Regardless, there is a need to carefully consider proposed allocations in proximity to the M3 (just one small site for 9 homes), busy a-roads and/or the railway lines, both from an air quality and a noise/vibrations perspective. With regards to site-specific policies, there is a requirement to consider noise impacts where necessary, although there could be the potential for further detail, e.g. specifying parts of the site that should be left undeveloped. With regards to borough-wide development management policy, in addition to the pollution focused policy (Policy E4), policy for Camberley town centre is of note, including for supporting 20 minute neighbourhood principles. Overall, whilst there are certain tensions with air/noise pollution objectives, **neutral effects** from a borough-wide perspective.

Biodiversity

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

Climate change adaptation

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

Climate change mitigation

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

Communities

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

Economy

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

Historic Environment

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

Housing

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

Land, soils and resources

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

Landscape

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

Transportation

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

Water

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

Conclusions

In conclusion, the appraisal predicts:

- **significant positive effects** in respect of housing objectives;
- **limited 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
- **limited or uncertain negative effects** in terms of biodiversity, climate change adaptation and water objectives.

Significant negative effects are not predicted under any of the topic headings.

Impacts and wider issues / opportunities discussed within this appraisal will be taken into account prior to plan finalisation. A number of specific recommendations are also made within Section 9 of the main report, which will be given consideration, including around the possibility of additional site specific policy.

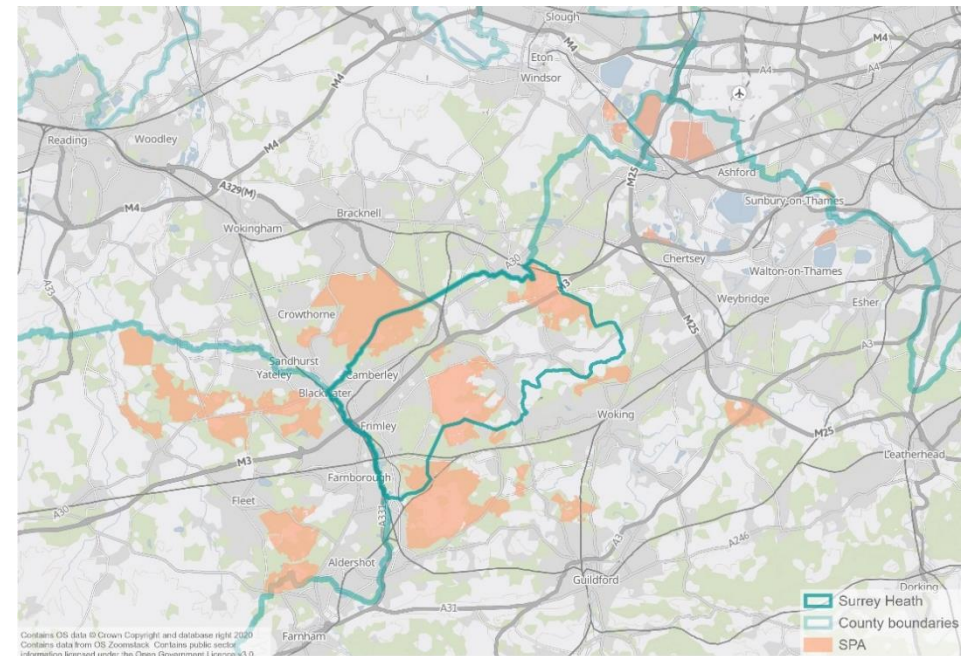
Cumulative effects

The SEA Regulations, which underpin the SA process, indicate that stand-alone consideration should be given to 'cumulative effects', i.e. effects of the Local Plan in combination with other plans, programmes and projects that can be reasonably foreseen. In practice, this is an opportunity to discuss potential 'larger than local' effects. The following bullet points cover some key considerations:

- Housing needs** – the proposed strategy involves unmet needs from Surrey Heath provided for within Hart District, and does not make any provision for the risk of unmet needs arising from elsewhere in the sub-region. However, this is an appropriate strategy because: A) the matter of unmet needs provision in Hart is agreed and set out in an adopted Local Plan, such that it does not need to be revisited at the current time; and B) the environmental constraints affecting Surrey Heath mean that the Borough is not suited to providing for unmet needs from Woking or elsewhere in Surrey, plus there is a need to recognise that Surrey Heath shares a housing market area with the North East Hampshire / Blackwater Valley authorities to the southwest (from where there is little or no risk of unmet needs arising). Work has been undertaken to appraise higher growth scenarios (as discussed above), but only because of the need to explore the possibility of providing for locally arising affordable housing needs more fully and/or providing for a larger 'supply buffer' over-and-above the housing requirement.
- The economy** – the proposed strategy makes limited provision for new employment land, and does support the redevelopment of several employment sites for residential, primarily in the Camberley/Frimley urban area, and most notably Sir William Siemens Square. The primary 'larger-than-local' consideration is the need to support the economy of the Blackwater Valley, and regeneration of Camberley town centre is supported in this respect, as is the proposed protection for strategic employment sites; however, there is a degree of uncertainty/risk ahead of transport modelling. The views of the Enterprise M3 LEP are sought through the current consultation.
- MOD operations** – this is a clear 'larger-than-local' consideration. The appraisal does not highlight any issues or risks, but the views of the MOD are sought through the current consultation.
- Transport corridors** – the appraisal does not highlight any major growth-related issues or opportunities, but there will be a need to revisit matters subsequent to the current consultation, in light of modelling and responses received key stakeholder organisations including National Highways, Transport for the South East and both Surrey and Hampshire county councils. Key corridors include those road corridors that link Woking to the M3 and M25, the M3 itself and the regionally important A331.

- Thames Basin Heath SPA** – the matter of in-combination impacts to the SPA is a focus of a stand-alone Habitats Regulations Assessment (HRA), noting that eleven authorities manage the SPA in partnership. Key considerations include management of Horsell Common in collaboration with Woking Borough, and Chobham Common in collaboration with Runnymede District and RB Windsor and Maidenhead.
- Landscape scale nature recovery** – there is a need to focus efforts on achieving conservation and 'net gain' objectives, in respect of biodiversity and wider natural capital and ecosystem services, at functional landscape scales, including landscape character areas and river corridors. A Local Nature Recovery Strategy (LNRS) will be forthcoming, under the Environment Act, but steps must be taken in the interim. Aside from matters relating to the TBHSPA and its associated heathland and former heathland landscapes, a primary consideration is potentially realisation of opportunities along the Blackwater Valley corridor in collaboration with Rushmoor Borough and Guildford Borough and other partner organisations. Views on constraints and growth-related opportunities are sought from biodiversity, nature-recovery and natural capital-focused organisations including Surrey Nature Partnership.

Surrey Heath within Surrey but linking closely to Berkshire and Hampshire



Next Steps

Publication of the Proposed Submission Local Plan

Subsequent to the current consultation it is the intention to prepare the proposed submission version of the Local Plan for publication in-line with Regulation 19 of the Local Planning Regulations 2012. The Proposed Submission Local Plan will be that which the Council believes is 'sound' and intends to submit for Examination. Preparation of the Proposed Submission Local Plan will be informed by the findings of this Interim SA Report, responses to the current consultation and additional evidence / appraisal work.

The SA Report will be published alongside the Proposed Submission Local Plan. It will provide all the information required by the SEA Regulations 2004.

Submission, examination and adoption

Once the period for representations on the Proposed Submission Local Plan / SA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether the LPU can still be deemed 'sound'. If this is the case, the Local Plan will be submitted for Examination, alongside a statement setting out the main issues raised during the consultation. The Council will also submit the SA Report.

At Examination the Inspector(s) will consider representations (alongside the SA Report) before then either reporting back on soundness or identifying the need for modifications. Modifications to the Local Plan will be prepared (alongside SA if necessary) and then subjected to consultation (with an SA Report Addendum published alongside if necessary).

Once found to be 'sound' the Local Plan will be formally adopted by the Council. At the time of adoption a 'Statement' must be published that sets out (amongst other things) 'the measures decided concerning monitoring'.

Monitoring

In-light of the appraisal monitoring efforts might focus on:

- Agricultural land – it is possible to monitor loss of agricultural land by grade.
- Air quality – the Council might review how air quality monitoring efforts are targeted in light of the Local Plan, including with a view to identifying problem areas outside of formally designated AQMAs, including potentially ecology-related.
- Biodiversity – there will be a need to develop a framework for ensuring that individual developments deliver biodiversity net gain in combination at landscape scales.

- Climate change adaptation –potentially monitor housing in close proximity to a fluvial flood zone (in addition to intersecting); also the 1 in 30 yr surface water flood zone.
- Climate change mitigation – there is a need to carefully consider how Local Plan monitoring links to wider monitoring of borough-wide emissions. On a specific point, it could be appropriate to monitor the proportion of new homes linked to a heat network (e.g. district-level); also the proportion of homes delivered to standards of sustainable design and construction that exceed building regulations.
- Employment land requirements – will require close monitoring, given that the current employment land evidence bases is now nearly two years old, and the regional and national economic context and baseline situation has evolved since that time.
- Housing – the Council already monitors numerous housing delivery related matters through the Authority Monitoring Report, and indicators should be kept under review.
- Transport – in Camberley town centre there will be merit to monitoring the travel behaviours of residents in detail, in order to test the hypothesis that per capita emissions from transport can be minimised at major growth locations.
- Water – ongoing consideration should be given to any risk of capacity breaches at WwTWs and other risks to the status of water courses.

Birds eye view of Camberley town centre

