

SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT

ISSUES AND OPTIONS PAPER



MARCH 2013



Great Place • Great Community • Great Future

Information on Consultation

This document explores the issues and options surrounding the need to allocate specific sites in the Borough for housing, employment, retail, transport, settlement boundaries, green spaces and other types of uses.

The public and other stakeholders are now invited to submit comments on the content of this Issues and Options Paper and the accompanying Sustainability Assessment/ Strategic Environmental Assessment Interim Report.

You can comment on both documents between:

28 March 2013 – 26 May 2013

All comments must be received by midnight on 26 May 2013

Comments should be submitted using either:

the online comments form at

- <http://www.surreyheath.gov.uk/IssuesandOptionsCommentsForm>;

or

- downloading the comments form and emailing it to the Planning policy team at planning.policy@surreyheath.gov.uk. The form can be accessed at <http://www.surreyheath.gov.uk/siteissuesoptions>

Comments can also be made by writing to us at

**Planning Policy and Conservation Team,
c/o Surrey Heath Borough Council,
Surrey Heath House,
Knoll Road,
Camberley,
Surrey GU15 3HD**

If you have any queries regarding this document please contact Helen Murch on Ph **01276 707211** or email at planning.policy@surreyheath.gov.uk

For queries regarding the SA/SEA Interim Report please contact John Devonshire on Ph **01276 707211** or email at planning.policy@surreyheath.gov.uk

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1. Introduction

What is site allocations?

- 1.1 In February 2012 Surrey Heath Borough Council adopted its Core Strategy and Development Management Policies Development Plan Document (hereafter referred to as the CS&DMP DPD). The Core Strategy sets out the vision and strategy for the future development of the Borough up until 2028. It deals in broad terms with the amounts and location of future housing, jobs and retail facilities as well as looking at transport, infrastructure, green spaces, biodiversity, climate change, Camberley Town Centre and design.
- 1.2 The Council now needs to decide in detail, and at a more local level, how the Core Strategy vision and policies will be delivered. A key mechanism for achieving this is through allocating sites for a particular type of development or use. These sites are allocated through policies and identified on the Policies Map. This is what the Site allocations Document will do.
- 1.3 The allocations will focus on the following types of uses:
 - Housing
 - Employment
 - Retail
 - Transport
 - Green spaces
 - Major Developed Sites in the Green Belt
- 1.4 The Site Allocations Document will not be allocating the Princess Royal Barracks, Deepcut as a housing sites as this has already been done through the Core Strategy. The site has been allocated for 1200 homes.
- 1.5 In addition, the site allocations work will not allocate sites within Camberley Town Centre. This will be done by the Camberley Town Centre Area Action Plan which is being progressed alongside this document. Figure 1.1 identifies the area of Camberley Town Centre which is excluded from the Site Allocations Document.
- 1.6 The policies within the Site Allocations Document will need to be consistent with the development plan. At the time of writing this consists of the South East Plan and the Surrey Heath Local Plan.
- 1.7 The Surrey Heath Local Plan is currently comprised of the CS&DMP DPD and the remaining saved policies of the 2000 Local Plan. Once adopted the Site Allocations Document will form part of the Surrey Heath Local Plan and it will supercede many of the remaining saved policies in the 2000 Local Plan. It will need to be consistent with the CS&DMP DPD and the South East Plan (if still in place).
- 1.8 The CS&DMP DPD makes reference to the Site Allocations Document and provides direction in relation to the delivery of the CS&DMP DPD objectives and policies. These directions are set out in Appendix 1 of this Paper.



Figure 1.1 – Area excluded from Sites DPD

Why are we doing Site allocations?

1.9 The purpose of the site allocations work is to decide upon the sites that will be needed to help deliver the Core Strategy vision and policies. Preparation of the site allocations document is something the Council must do. It will enable the Council to:

- provide detailed local control over future development in the Borough;
- deliver sustainable development that reflects the vision and aspirations of the Surrey Heath community;
- Comply with the directions relating to site allocation in the CS&DMP DPD.

How does this Paper fit in to the Site Allocations work?

1.10 The process that the Council will follow in preparing the Site Allocations Document is set out in Diagram 1.1.

1.11 This shows that the Issues and Options Document is the first opportunity for local communities and other stakeholders to comment on the sites that have been suggested for possible allocation. This stage is important because it will help the Council to decide on which sites should be included as part of its preferred approach.

Working with local communities

1.12 In making decisions about which sites to allocate the Council is keen to work with local communities and other important stakeholders. This will take place through-out stages 1 & 2 of the process as identified in Diagram 1.1.

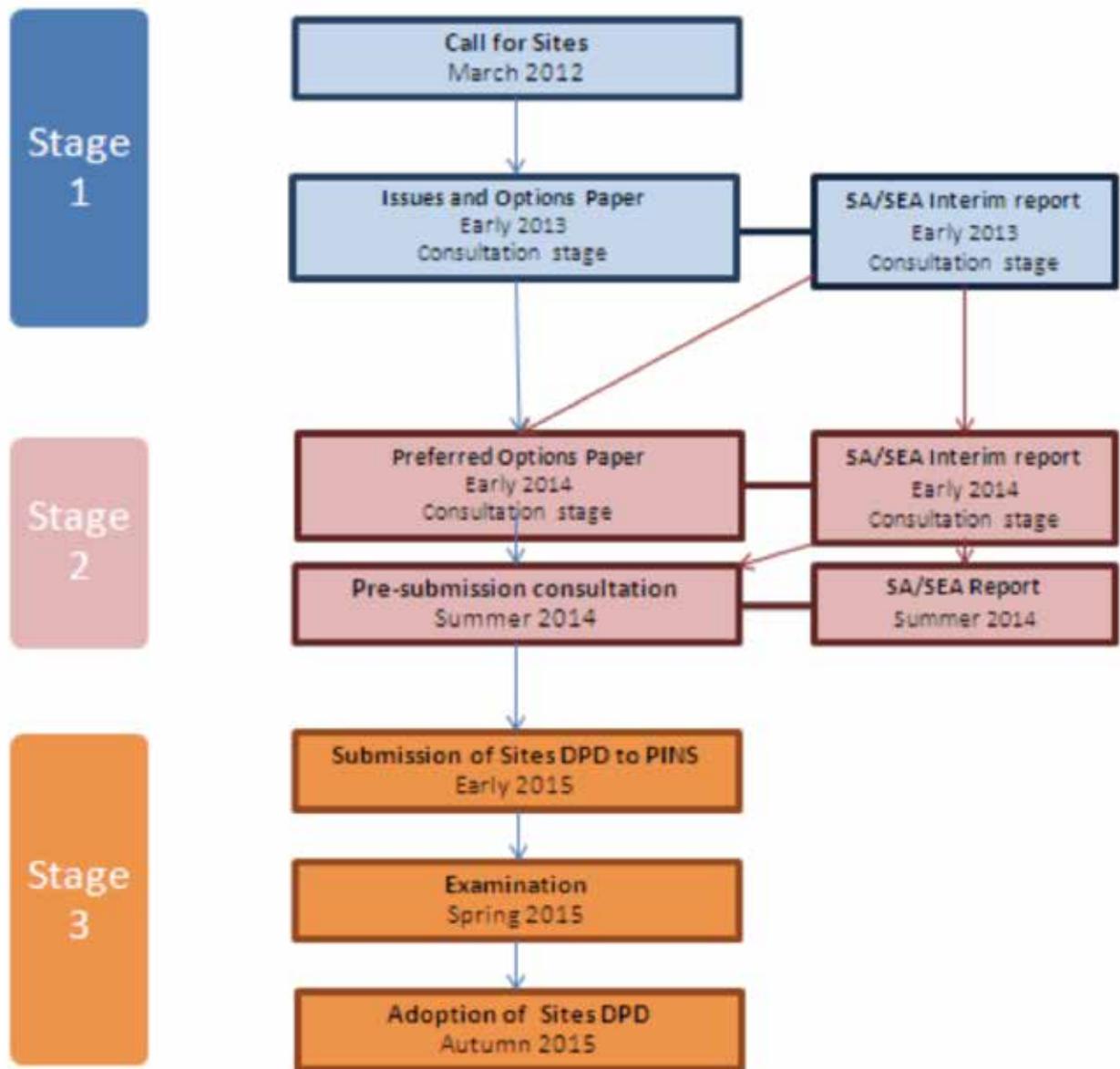


Diagram 1.1 – The Site Allocations Process

1.13 To enable us to work closely with local communities and deliver policies that are relevant to them we have divided the Borough into 11 local areas as shown in Figure 1.2.

How do I use the Issues and Options document?

1.14 We would like to hear your views on the following:

- The suitability of the sites that have been submitted to us and how well they help deliver the Core Strategy requirements;
- Whether we have correctly identified all the issues and options that arise from the Core Strategy requirements and the sites that are currently being submitted.

- 1.15 To help you make comments we have arranged the Issues and Options Paper into the following sections:
- Housing
 - Employment
 - Retail
 - Transport
 - Green space
 - Major developed sites in the Green Belt.
- 1.16 Each section looks at the potential sites at both the borough-wide, and local area levels. The sections conclude with a series of questions to help you think about the matters that are being raised and to guide your responses. However, you are free to express your views on any site allocation matter which you feel should be brought to the attention of the Council.

How do I make comments?

- 1.17 You can comment by completing the on-line response form. The form is available at: <http://www.surreyheath.gov.uk/IssuesandOptionsCommentsForm>
- 1.18 Alternatively you can download a response form from <http://www.surreyheath.gov.uk/siteissuesoptions> and return it to us via email at planning.policy@surreyheath.gov.uk
- 1.19 Comments can also be made by writing to us at Planning Policy and Conservation Team, c/o Surrey Heath Borough Council, Surrey Heath House, Knoll Road, Camberley, Surrey GU15 3HD.
- 1.20 Any comments on the Issues and Options Paper will need to be with us by **midnight on 26 May 2013**

What happens next?

- 1.21 Once the consultation period has expired, the Council will consider the comments made and use this to help us to produce a Preferred Options document which we expect to publish in early 2014.
- 1.22 We will publish all comments on our website later this year.

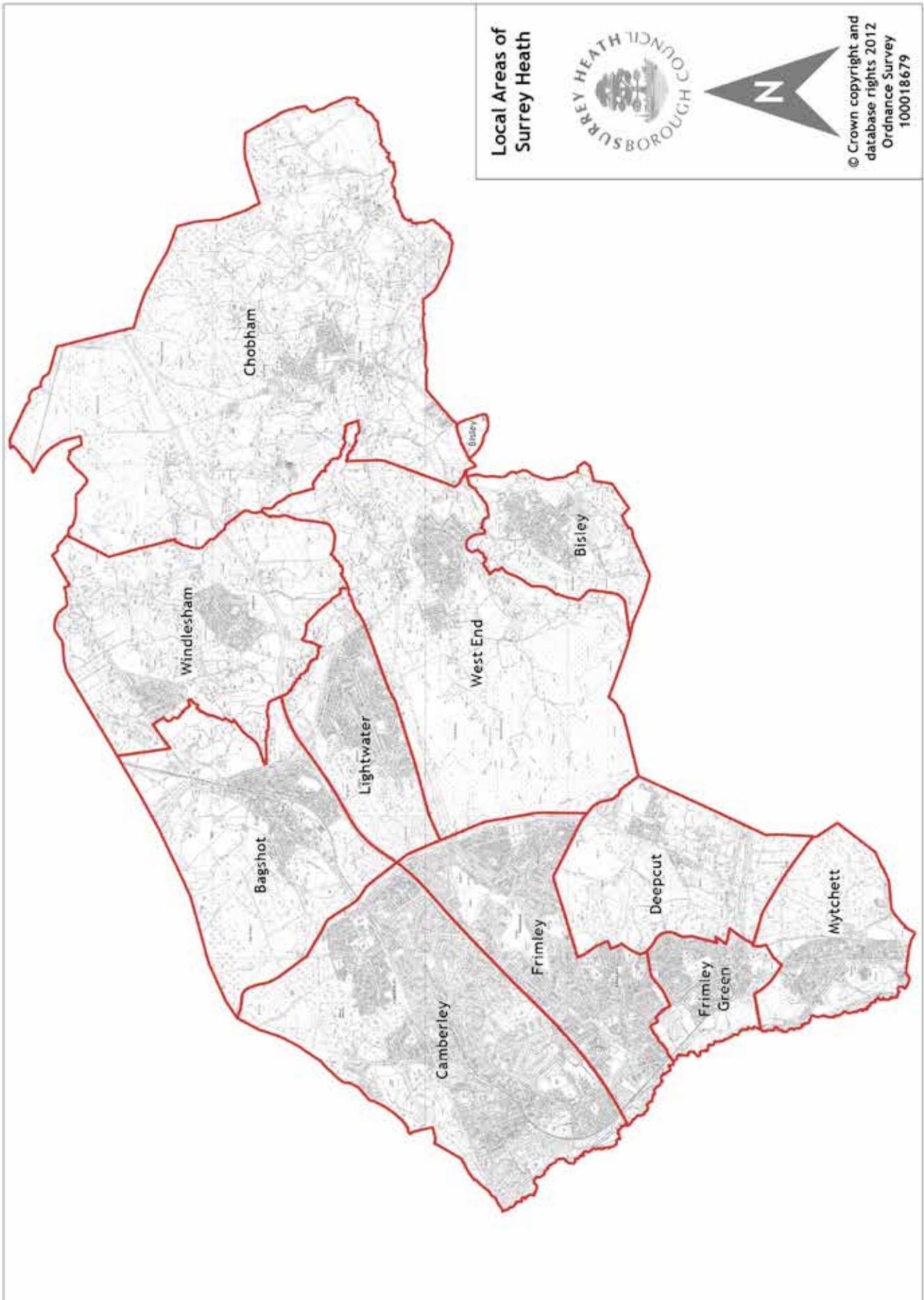


Figure 1.2 – Local Areas of Surrey Heath

2. Context

Policy context

National Planning Policy Framework

- 2.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. The Council will need to heed NPPF policy when determining which sites to bring forward through the site allocations process.
- 2.2 The achievement of sustainable development is the key NPPF policy for the Site Allocations Document. This requires the Site Allocation Document to:
- Contribute to building a strong responsive and competitive economy in Surrey Heath by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation.
 - Provide the supply of housing required to meet the needs of the Surrey Heath community with accessible local services that reflect need and support its well-being.
 - Contribute to protecting and enhancing the natural, built and historic environment.
- 2.3 The Planning Policy for Traveller Sites (PPTS) similarly sets out Government policy for Travellers and it is to be read in conjunction with the NPPF. The key PPTS policy for the Site Allocation Document is the requirement to increase the number of traveller sites in appropriate locations and ensure that these sites are sustainable economically, socially and environmentally.

South East Plan

- 2.4 Whilst the Government has stated its intention to revoke the Regional Spatial Strategy for South East England (The South East Plan), at this time this process has not been completed. Accordingly, the Surrey Heath Local Plan must have regard to, and be consistent with it.¹
- 2.5 RSS policies of particular relevance to the Site Allocations Document are identified in Appendix 2. Most of these policies are referred to later in this Paper when the various land use designations are considered.

The Surrey Heath Local Plan

- 2.6 The Core Strategy & Development Management Policies Development Plan Document (CS & DMP DPD) was adopted in February 2012. The Sites Allocations Document must be in conformity with the Core Strategy. As noted previously, there are a number of policies in the CS & DMP DPD which contain specific directions for the site allocation work. These set out in Appendix 1.
- 2.7 The Local Plan 2000 contains a number of extant 'saved' policies which will be reviewed through the Site Allocations work. These 'saved' policies are detailed in Appendix 2.

¹ Planning and Compulsory Purchase Act 2004 (as amended), and The Town and Country (Local Planning) Regulations 2012

Sustainability Appraisal

- 2.8 The Site Allocation Document must be subject to a Sustainability Appraisal (SA) and a Strategic Environmental Assessment (SEA). The purpose of SA/SEA is to promote environmental protection and contribute to the integration of environmental, social and economic considerations into the preparation and adoption of plans, with a view to promoting sustainable development.
- 2.9 The preparation of each of the various stages of the Sites DPD will be preceded by an SA/SEA which will be used to help shape and form the development of the DPD. A SA/SEA has been prepared for the Issues and Options Paper and this is available on the Council's website at <http://www.surreyheath.gov.uk/siteissuesoptions>

Habitats Regulation Assessment

- 2.10 The Habitats Directive requires the Council to assess the impact of the plan on Natura 2000 sites. This is known as an Appropriate Assessment or Habitats Regulations Assessment. An Appropriate Assessment will be undertaken at a later stage in the preparation of the Site Allocations Document.

Supporting evidence

- 2.11 The policies and allocations proposed in the Site Allocations Document must be supported by evidence (research). The evidence supporting this Issues and Options Stage is set out in Appendix 3.

3. Vision and Objectives

The Vision

- 3.1 As noted previously, the purpose of the Site Allocations Document is to assist in the delivery of the policies of the CS&DMP DPD. As such, the vision and objectives of the CS&DMP DPD will be the main drivers of the Site Allocations Document.
- 3.2 The vision for Surrey Heath set out in the CS&DMP DPD is as follows:

By 2028 residents will continue to enjoy a prosperous and high quality of life based around sustainable growth and a strong economy supporting a healthy, safe and diverse society that enjoys a high quality environment in which the natural heathland environment and character of towns and villages (with their green areas) is protected and enhanced. New development will be climate change resilient and continue to be well designed and of a high quality. This will include housing that meets the needs and aspirations of all sectors of the local community. The community will continue to have good access to high quality employment, healthcare and education. Rates of economic activity will remain high, the local community will be more active with improved access to leisure and recreational facilities and a network of green infrastructure.

- 3.3 This vision reflects not only the needs and aspirations of the Surrey Heath community, but it is also considered to be consistent with the key principles sought in the NPPF. As such it is felt to be a sound basis for the Site Allocations Document.

The Objectives

- 3.4 The Site Allocation objectives are set out below. They are based on the CS&DMP DPD objectives:

- 1 To promote and deliver sustainable development in the Borough.

“Housing, Infrastructure and Environment”

- 2 Provide sufficient housing to meet the Borough’s need without causing harm to areas of importance for biodiversity.
- 3 Provide housing that meets the needs of all sections of the community, including Travellers.
- 4 Deliver a sustainable rural community set within a high quality built and natural environment at Deepcut.
- 5 Protect and enhance biodiversity within the Borough including sites of local importance for biodiversity and aim to deliver Surrey Biodiversity Action Plan (BAP) targets.
- 6 Ensure that new development contributes to environmental, infrastructure and service improvements and minimises impacts upon both the natural and built environment.
- 7 Ensure new development respects the essential character of the local area, including historic structures and environment.

- 8 Maintain and protect the Countryside and Green Spaces in settlement areas and provide an integrated green infrastructure network.
- 9 To minimise impact on climate change and to minimise the effect of climate change upon the Borough through a reduction of greenhouse gas emissions and adoption of more environmentally friendly technologies and practices in both new and existing developments.
- 10 Improve travel choice and transport services to encourage sustainable travel patterns and, in particular, reduce reliance on the private car.

“Economic Development”

- 11 Maintain the economic role of the Borough within the Western Corridor and Blackwater Valley sub-region.
- 12 Maintain the role of Bagshot and Frimley as district centres for local shops, services and community facilities and protect these uses elsewhere in the Borough.
- 13 Identify sites on which employment use should be maintained and growth encouraged.

“Children and Young People”, “Health and Well Being” and “Safer and Stronger Communities

- 14 Support the community through: protection from crime and the fear of crime, reflection of cultural diversity, improved facilities for health, well being and life-long learning.
- 15 Provide and support high quality leisure and cultural facilities that are accessible to all.

- 3.5 These objectives are considered to follow the direction given by the CS&DMP DPD and to reflect the priorities of the NPPF. As such they are considered to be a sound approach for the Site Allocations Document.

4. Housing

- 4.1 This section looks at the site allocation issues surrounding the delivery of the Core Strategy housing policies. The section considers the accommodation requirements for both the settled population and for travellers.²
- 4.2 The section provides you with:
- key facts about each of the housing types;
 - the issues the Council has identified in relation to this land use;
 - the potential site and policy options
 - Questions to help you to comment

General Housing

Policy context

NPPF

- 4.3 The NPPF states that the purpose of the planning system is to contribute to sustainable development. Paragraph 3 identifies 3 dimensions to sustainable development: economic, social and environmental. As part of its economic, social and roles the planning system is expected to:
- ensure that sufficient land of the right type is available in the right places; and at the right time to support growth;
 - provide a supply of housing to meet the needs of present and future generations;
 - contribute to protecting and enhancing the natural, built and historic environment.
- 4.4 Paragraph 47 sets out how LPA's are expected to boost significantly the supply of housing:
- Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, including identifying key sites which are critical to the delivery of the housing strategy;
 - Identify a supply of specific deliverable sites sufficient to provide 5 years worth of sites against their housing requirement with an additional buffer of 5%.
 - Identify a supply of specific deliverable sites or broad locations for growth for years 6-10 and where possible, for years 11 – 15.
- 4.5 In rural areas LPA's are expected to plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites (Paragraph 54). To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities (Paragraph 55).

The South East Plan

- 4.6 Policy H1 of the South East Plan allocates to Surrey Heath a housing target of 3,740 net additional dwellings in the period 2006 – 2026. Policy H2 expects LPA's to work in partnership to allocate and manage land supply to deliver the district housing provision while ensuring appropriate regard to environmental and infrastructure issues.

² Travellers are defined as Gypsy & Travellers and Travelling Showpeople.

Surrey Heath Local Plan

- 4.7 The CS&DMP DP was adopted in February 2012 and has a plan period running from 2011 to 2028.
- 4.8 Policy CP1 sets out the spatial strategy for the borough. It expects new development to come forward largely through redevelopment of previously developed land (PDL) within the western areas of the borough. The Princess Royal Barracks (PRB), Deepcut is identified as strategic site and is expected to deliver a large portion of the future housing supply. The settlements in the eastern part of the borough are seen as having limited capacity for accommodating development. Green Belt boundaries are expected to be maintained.
- 4.9 Policy CP3 states that the Council will make provision for 3,240 (net) additional dwellings in the period 2011 – 2028. A total of 2,730 are to be provided in the period to 2025 with a further 510 to be delivered between 2026 and 2028.
- 4.10 Based on the Borough spatial strategy set out in Policy CP1, Policy CP3 sets out how the new housing should be generally distributed across the settlements of the Borough in the period 2011 to 2025.
- 4.11 Beyond 2025 Policy CP3 states the Council will make provision for a further 510 dwellings within settlement areas. However, it goes on to note that if insufficient settlement sites come forward, sustainable sites within the Countryside Beyond the Green Belt will be released.
- 4.12 Policy CP3 makes provision for small scale affordable housing schemes as rural exception sites outside of settlement boundaries of the rural villages.
- 4.13 The 2000 Local Plan contains two extant saved policies related to housing. Policy H3 identifies Housing allocation sites for the period 2001 – 2006. Several of these remain undeveloped. Policy H8 states that the housing reserve sites at West End and Windlesham are reserved to meet possible long-term development needs.

Key facts

Historic housing delivery

- 4.14 Historically the Borough was a high performer in terms of housing delivery.³ In the period 1991 to 2006, it regularly exceeded the annual delivery requirements by a significant amount (Figure 4.1).
- 4.15 With the introduction of the SPA in 2005 the Borough's ability to maintain housing delivery became severely constrained and for 3 years Surrey Heath faced a moratorium on housing developments of 10 units and above. The introduction of SANG as a mechanism to provide SPA avoidance measures has since facilitated the delivery of housing but the difficulty in providing SANG still acts as a heavy brake on housing provision in the Borough. As a consequence from 2006 the Borough has been unable to meet its annual housing requirement.

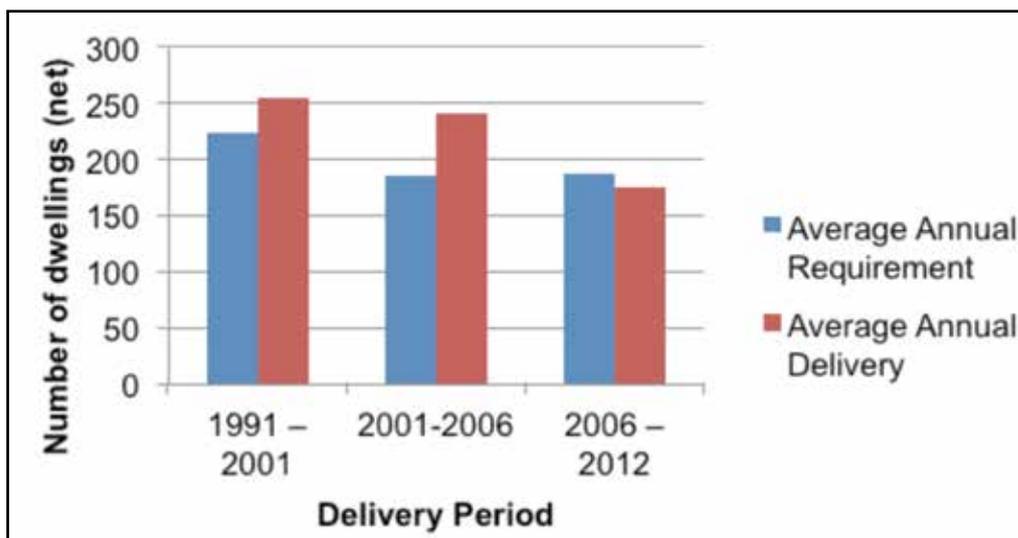


Figure 4.1: Average annual delivery against annual requirement 1991 - 2012

Current requirements

- 4.16 Policy CP3 of the Core Strategy requires the Council to make provision for 3,240 net new dwellings in the period 2011 to 2028. The policy requires 2,730 of the new dwellings to be provided in the settlements in the period to 2025 with the remaining 510 to be delivered between 2026 and 2028. In this later period, sites are expected to come from the settlement areas although provision is made for sites within Countryside Beyond the Green Belt (CBGB) to be used where there are insufficient settlement sites.
- 4.17 As at 31st March 2012 596 units had already been provided, were under construction, or were in unimplemented permissions. A further 1400 homes are expected to be provided in Camberley Town Centre and the Princess Royal Barracks, Deepcut. Windfalls are anticipated to provide for a further 188 units. As Table 4.2 shows, this leaves 1,056 dwellings still to be delivered in the period up to 2028. Within this total, 556 need to be provided within the settlements by 2025.⁴

	No units (net)
Housing to be provided in period 2011	3240
Housing already delivered or committed:	
● Housing already delivered in period up to March 2012	179
● Housing under construction	185
● Housing to be provided in key sites in period 2011 - 2028 (net)	
● Camberley Town Centre	200
● PRB, Deepcut	1200
● Housing in unimplemented permissions (March 2012)	232
● Anticipated windfalls 2012 to 2028	188
Total	2184
Housing remaining to be delivered by 2028	1056

Table 4.3 – Progress on delivery of Policy CP3 (as at March 2012) for period to 2028

⁴ Site Allocations Technical Background Paper – Provision for Housing 2012 – 2028; December 2012

4.18 A key purpose of the Site Allocations process is to identify which sites in the Borough these remaining 1,056 dwellings will be delivered through.

4.19 When considering which housing sites to allocate the Sites Allocations Document will only concern itself with sites with a net capacity of 5 plus units. Sites with a capacity below this are treated as windfalls and will not be allocated.

Housing supply

4.20 A supply of potential housing sites has been identified that could be allocated through the Site Allocations Document to help meet the residual Core Strategy housing targets of 1056 net new units.⁵ The supply has a total of 93 sites accommodating a potential 2403 net new dwellings. The sites are distributed across the local areas and through both urban and countryside locations.

4.21 The full list of the supply sites is contained in Appendix 4 and a summary of their locations is set out in Table 4.3.

4.22 The following types of sites have not been included in this supply:

- Sites within Camberley Town Centre AAP area;
- The PRB, Deepcut;
- Sites under construction
- Sites with unimplemented planning permissions;
- Sites with under 5 net new units. These are considered to be windfalls and too small to allocate;
- Sites falling entirely within 400m of the TBH SPA.

Local Area	Net additional dwellings identified within settlement	Net additional dwellings identified outside settlement	Total identified housing in local area
Bagshot	155	238	393
Bisley	130	9	139
Camberley (excluding CTC)	324	0	324
Chobham	42	155	197
Deepcut (excluding PRB)	12	336	348
Frimley	258	0	258
Frimley Green	31	48	79
Lightwater	17	0	17
Mytchett	38	50	88
West End	0	325	325
Windlesham	20	215	235
TOTAL	1027	1376	2403

Table 4.3: Potential housing site supply by location - 2011 to 2028

⁵ The site supply has been compiled from Unimplemented 2000 Local Plan housing allocations, 2012 SHLAA findings and Sites submitted to the Council since the publication of the SHLAA.

- 4.23 With 2403 net new dwellings potentially available in sites this suggests that the Borough has more than a sufficient supply to deliver the 1056 new homes which remain to be provided through the Site Allocations Document.

Distribution

- 4.24 Over the CS&DMP DPD plan period Policies CP1 and CP3 expect new housing to be delivered in the settlements, and primarily within the Western Urban Area. Policy CP3 also sets out a more detailed distribution pattern for new housing in the period up to 2025. This is given below in Table 4.4, all be it with the PRB and CTC allowances removed.

Settlement area	Net additional dwellings
Bagshot	270
Bisley	45
Camberley (excluding CTC)	660
Chobham	55
Deepcut (excluding PRB)	35
Frimley	120
Frimley Green	20
Lightwater	40
Mytchett	55
West End	20
Windlesham	20
TOTAL	1340

Table 4.4: Policy CP3 Housing distribution 2011 to 2025

- 4.25 Analysis of the provision of housing to date and the supply of potential housing in light of Policy CP3 2025 distribution shows that there is a supply of 672 units in settlement sites for the period up until 2025 giving a surplus of 79 potential housing units.⁶ The Western Urban area⁷ benefits from a surplus of 91 units above that which is required. The supply for this period is also considered to be in general conformity with the spatial distribution requirements of Policy CP3.
- 4.26 For the period from 2026 to 2028 Policy CP3 expects 510 net new units to be delivered. These are expected to be settlement sites although provision is made in the policy for CBGB sites to be used if insufficient settlement sites are available. At present the Borough has a potential supply of 1027 units within the settlements for the period from 2012 to 2028. This is slightly short of the 1056 net new units required. As there is a surplus in the period to 2025 this indicates a slight shortfall for the period from 2026 to 2028. This potential shortfall occurs some 13 years into the future where there is a degree of uncertainty over site supply.
- 4.27 Outside of the settlement areas there is a supply of 1376 potential units in areas outside of the settlements. Many of the sites cluster in 6 broad areas, 3 of which lie fully within CBGB with a further 2 partially within. The locations of these 6 broad areas is shown in Appendix 5.

⁶ Site Allocations Technical Background Paper – Provision for Housing 2012 – 2028; December 2012

⁷ The Western Urban Area is composed of the Camberley, Frimley, Frimley Green and Mytchett neighbourhoods.

- 4.28 The housing supply currently has 940 housing units in CBGB areas, well in excess of the 510 units the Core Strategy expects to be delivered in the period 2026 to 2028. The two housing reserve sites at West End and Windlesham fall within this CBGB supply.
- 4.29 The Core Strategy requires the Green Belt boundary to be retained during the plan period. When considering the CS&DMP DPD at Examination the Inspector concluded that exceptional circumstances to justify alteration of the Green Belt boundary were not demonstrated. A review of Green Belt boundaries is not a function of the Site Allocations work document and would need to be done through a review of the Core Strategic policies. Such a review will not take place within the current Plan period.

Phasing

- 4.30 The housing delivery strategy set out in the Core Strategy is not front loaded as the Borough does not have a 5 year housing land supply due to the difficulty in providing SANG. At March 2012 the housing land supply stood at 2.5 years. The majority of the housing delivery is thus expected to occur in the period from 2016 to 2026. A major contributor to this is the PRB development at Deepcut which is expected to deliver the majority of its housing in the 6 to 15 year period.
- 4.31 The phasing of the potential housing supply with the settlement areas is set out in Table 4.5. The phasing data is based on the information contained in the 2012 SHLAA.

Local Area	<5 years	6 to 10 years	11 to 15 years	>15	Total
Bagshot	29	24	57	45	155
Bisley	0	5	0	125	130
Camberley (excluding CTC)	85	206	5	28	324
Chobham	0	35	0	7	42
Deepcut (excluding PRB)	0	0	12	0	12
Frimley	23	141	0	94	258
Frimley Green	0	0	0	31	31
Lightwater	0	17	0	0	17
Mytchett	15	0	18	5	38
West End	0	0	0	0	0
Windlesham	0	0	0	20	20
TOTAL	152	428	92	355	1027

Table 4.5: Potential phasing of the in-settlement housing supply

- 4.32 From this it can be seen that 672 units of the potential in-settlement housing supply are expected to be delivered within 15 years. The majority of the units will be delivered in the 6 to 15 year phasing and thus towards the end of the 2012 - 2025 period. This broadly reflects the phasing pattern identified in Paragraph 5.16 of the Core Strategy.

Princess Royal Barracks development

- 4.33 Although the Princess Royal Barracks (PRB) development is a strategic site with its own allocation policy in the Core Strategy, it is of interest to the site allocations work because of its implications for phasing of other sites.

- 4.34 The PRB site in Deepcut accounts for 1200 new homes, almost half of the housing that the Borough is expected to deliver over the CS&DMP DPD plan period.
- 4.35 The outline application currently before the Council for determination and proposes that the site delivers the new housing units in the following phasings:

Phase	Period	No. of dwellings
Phase 1	End 2016-end 2018	458
Phase 1a	2019	31
Phase 2	Mid 2019-end 2022	381 dwellings
Phase 3	end 2022-early 2025	330 dwellings

- 4.36 All housing units are thus expected to be delivered by 2025. Although some units are expected to be delivered in the first 5 years of the plan period, most will come forward in years 6 to 15.

Issues

Meeting full need

- 4.37 Paragraph 47 of the NPPF expects Councils to ensure that their Local Plan meets the full, objectively assessed housing needs. For Surrey Heath full need would be represented by the findings of the 2009 SHMA.
- 4.38 In preparing the CS&DMP DPD consideration was given to meeting full need as identified in the SHMA. This would have provided for 12,830 new homes in the 2011-2028 period. The option was rejected on the basis of insufficient housing land and SANG supply, an unacceptable requirement to release Green Belt and pressure on employment land. After considering all the options before it to meet need, the Council decided to meet the South East Plan target. This was considered by the Council to be an objective and realistic approach to meeting housing need in the Borough and the approach was supported by the Inspector at Examination of the CS&DMP DPD. In light of this it is not considered that the Site Allocations Document will need to allocate sites to meet full need as represented by the SHMA.
- 4.39 The Site Allocations Document will thus follow the adopted housing requirement set out in the CS&DMP DPD.

Meeting need to 2025

- 4.40 The Council currently has a healthy supply of sites in the settlements that is in general conformity with the spatial pattern laid down in Policy CP3. On the basis of the current supply it is not anticipated that the Borough will have difficulty in identifying sufficient sites to meet policy requirements to 2025. The excess of sites will enable the borough to have a choice in selection.
- 4.41 In view of the historic rate at which previously unidentified sites have come forward for development it is currently considered that this supply of settlement sites will continue to remain adequate, even if sites are lost or their capacities reduced as a result of further detailed analysis and consultation processes during the preparation of the Site Allocations Document.

Meeting need 2026 – 2028

- 4.42 There is currently a potential small shortfall of settlement sites at the end of the plan period. At some 13 years into the future there is a degree of uncertainty over site supply. Several factors will have a bearing on supply certainty which pull in different directions. These are:
- The potential for further unidentified settlement sites to come forward unexpectedly;
 - The anticipated on-going delivery of NPPF non-compliant windfalls;
 - Further detailed analysis of sites, and public consultation could result in a reduction in the number and/or capacity of sites in the current housing supply.
- 4.43 At a result of the above it is not possible at this stage to say with certainty that all of the required 510 units needed for the 2026 – 2028 period can be delivered through settlement sites.
- 4.44 Policy CP3 does make provision for this possibility by allowing sites within Countryside Beyond the Green Belt (CBGB) areas to come forward in the period after 2025 if there are insufficient sites within settlement areas. With around 940 units in CBGB locations the Borough has a very healthy excess of sites to draw down upon if required.
- 4.45 Consideration will need to be given to whether the Borough wishes to:
- Try to ensure all of its residual requirement to 2028 is provided through sites in settlement areas. A greater degree of certainty over the delivery of this would be obtained further into the plan period and it may be best achieved through limiting site allocations to the period to 2025 and having a plan or housing policy review in 2021 to allocate sites for the 2026 – 2028 period.
 - Try to provide certainty of in the delivery of the 2026-2028 Core Strategy Housing target by allocating all sites at this early stage. In this case it is likely that sites in CBGB areas would need to be allocated.
- 4.46 If it is decided that CBGB sites do need to be drawn down upon, the Council will have to decide which CBGB sites to allocate. In making its decision, the Council would need to consider Core Strategy policy requirements, the sustainability of the CBGB locations, their viability, whether they can deliver their own SANG and whether they would be brought forward as urban extensions or stand-alone allocations. The reserve sites at West End and Windlesham will need to be considered alongside other CBGB sites in terms of need and suitability for allocation.
- 4.47 The site allocations work should explore the possibility of improving the supply of settlement sites in the 2026 to 2028 period by establishing through the consultation processes whether any of the sites in the current >15 year supply could be phased forward.

5 year supply

- 4.48 The lack of a 5 year land supply and the proposed phasing of delivery continuity of delivery was a matter addressed by the Inspector at the Core Strategy Examination. Although he identified that the plan's approach conflicted with national policy he recognised that it represented a pragmatic attempt to address a real and pressing local constraint on housing delivery generated by the need to locate land for SANG. He was satisfied that these circumstances justified departing from national policy in respect of ensuring a continuous delivery of housing through the plan period.

- 4.49 Since the adoption of the Core Strategy the NPPF has been introduced. This expects councils to identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. LPAs with a record of persistent under-delivery are expected to provide a 20% buffer (Paragraph 47).
- 4.50 It was noted in Section 2 that prior to the introduction of the SPA the Borough has been a high performer in terms of housing delivery. The introduction of the SPA and the subsequent requirement to provide SANG has acted as a serious constraint on the Borough's ability to deliver housing since 2005. The SPA and its impacts on housing delivery is a matter that is outside of the control of the Council.
- 4.51 On the basis of the Council's historic good delivery performances, and the pressing local constraints generated by SPA and SANG requirements and the Inspector's findings, it is considered that Surrey Heath should not be expected to provide a 20% buffer on top of the 5 year supply requirement.
- 4.52 The site allocations work will however, explore the possibility of improving the 5 year supply by establishing through the consultation whether any of the sites identified could be phased forward.

Impacts of potential delayed delivery of PRB

- 4.53 If delivery of the PRB site housing was delayed it would have a significant impact on the Borough's ability to achieve the provision of 2,740 net new homes in the borough by 2025. The anticipated phasings set out in Paragraph 5.16 of the Core Strategy would also be affected.
- 4.54 Given the size of this project and its significance to the achievement of Core Strategy policies CP1 and CP3, the Site Allocations Document will need to provide for flexibility in phasing if the PRB site does not come forward as expected. This could involve an early review of the whole Site Allocations Document or just the housing policies in 2021, if delivery targets are not met.

Rural exception sites

- 4.55 The Council recognises the need to provide affordable housing within the rural areas of the borough. It is also recognised that there will be limited opportunities to provide housing within the rural settlements at a scale which will deliver significant levels of affordable units. As such, the Council will consider permitting development in the countryside outside of defined rural settlements and within the settlement of Chobham, provided a need can be demonstrated and the scheme constitutes 100% affordable housing (Policies CP3 & DM5).
- 4.56 The site allocations work will need to give consideration to whether any rural exception sites should be allocated.

Extant housing sites

4.57 A number of the 2000 Local Plan housing allocations remain unimplemented. Consideration will need to be given to whether to retain or delete these allocations.

SANG provision

- 4.58 Ensuring an on-going supply of SANG is critical to the delivery of the Core Strategy.
- 4.59 The existing public SANG supply is very limited. It serves the Borough for schemes up to net 9 units and schemes to 100 units within its catchment. The catchment is essentially the Western Urban Area only. There is currently no SANG provision for 10-100 unit schemes in the eastern half of the Borough.
- 4.60 SANG will be needed for the 1056 units which will be the focus of the site allocations work. A total of 20ha will be required. As 75% of the sites in the settlement supply are reliant on the provision of off-site public SANG it is very important that new public SANG are identified and delivered to meet need through-out the plan period. At the moment this supply does not exist.
- 4.61 The possibility of the Borough not being able to bring forward SANG to maintain housing supply is a significant risk to the delivery of Policy CP3. The Site Allocations Document will need to address this risk. If SANG delivery is not keeping pace with housing delivery, consideration may need to be given to prioritising the use of sites that are capable of delivering their own SANG.

Options

4.62 The issues surrounding the delivery of housing are complicated and involve supply, distribution, phasing and SANG matters. Although separate, these issues are interlinked. If they are considered as a whole, rather than in their individual constituent parts the Council has a number of potential policy options to deal with the allocation of housing to assist in meeting the requirements of Policy CP3. These policy options are shown in Table 4.6:

Ref.	Policy option	Approach	Advantages/disadvantages
1	<i>Do nothing</i>	Rely only on windfalls and existing commitments (including Camberley Town Centre and PRB, Deepcut). In this option the Council would not allocate any further sites and would not pursue further SANG provision.	<p>This option would leave the Council with a shortfall in housing numbers to 2025, and from 2026 to 2028, and could result in an inability to deliver windfalls as a result of potential SANG shortage.</p> <p>The Core Strategy policies would not be delivered under this option.</p>

Ref.	Policy option	Approach	Advantages/disadvantages
2	<i>Use the existing SANG and settlement housing supplies</i>	Rely on windfalls, existing commitments and allocate settlement sites from the existing supply. The Council would also rely on the existing SANG supply and not actively pursue the allocation of further SANG.	<p>This option would deliver sufficient settlement housing numbers to 2025 but it may not be sufficient to provide settlement sites in the period 2026 to 2028. If no further public SANG was forthcoming the Council would be unable to deliver much of the housing supply.</p> <p>The Core Strategy policies would not be delivered under this option.</p>
3	<i>Use the existing settlement supply and develop new SANG</i>	Rely on windfalls, existing commitments and allocate settlement sites from the existing supply. The Council would rely on the existing SANG supply and would actively pursue the allocation of further public SANG.	<p>This option would deliver sufficient settlement housing numbers to 2025 but it may not be sufficient to provide settlement sites in the period 2026 to 2028.</p> <p>If a full component of SANG is delivered, and further settlement sites come forward in the period 2026 – 2028, and the PRB site is delivered as scheduled the Core Strategy policies would be delivered under this option. It represents a low to medium risk strategy in terms of delivering housing numbers.</p>
4	<i>Phase forward large sites in CBGB to meet potential 2026 to 2028 shortfall</i>	<p>Rely on windfalls, existing commitments and allocate settlement sites from the existing settlement supply. If insufficient settlement sites were available, suitable sites within the CBGB which can provide their own SANG would be draw down on. The Council would relying on the existing SANG supply and actively pursuing the allocation of further public SANG to support the settlement site delivery.</p> <p>The policy would:</p> <ol style="list-style-type: none"> 1. identify settlement sites to be allocated in the period to 2025 and in the period 2026 - 2028, along with their capacities and phasings, 2. identify sites within the CBGB which would be brought forward in the period 2026 – 2028. Such sites would be capable of delivering their own SANG. 	<p>If a full component of SANG is delivered and the PRB site is delivered as scheduled, the Core Strategy policies would be delivered under this option. It represents a low risk strategy in terms of delivering housing numbers.</p>

Ref.	Policy option	Approach	Advantages/disadvantages
5	<i>Shorter plan period for housing policies with early review</i>	Housing policies in Document to have a plan period to 2025. Rely on windfalls, existing commitments and allocate settlement sites from the existing supply to meet Policy CP3 housing targets and distribution to 2025. The Council would rely on the existing SANG supply and would actively pursue the allocation of further public SANG. Document to contain a provision which provides for a review in 2021 to consider the delivery of housing in the remainder of the Core Strategy plan period 2020 - 2028.	The plan would provide certainty on housing numbers to 2025 and the early review would facilitate certainty over the delivery of housing in the later periods of the plan.
6	<i>Site Allocations Document Review</i>	Document to contain a provision which brings forward a review of the Site Allocations Document if construction had not commenced on dwellings at PRB, Deepcut by 31 st March 2021.	The risk that the required housing numbers over the 2011 – 2028 plan period would not be delivered is very low under this option.

Table 4.6 – Housing Policy Options

Questions to consider

Question 4a

Appendix 4 sets out the potential housing sites known to the Council at this stage. Are you aware of any other potential housing sites that are available and which are not identified in Appendix 4? If so, please supply details on the new site form which can be accessed at <http://www.surreyheath.gov.uk/siteissuesoptions>

Question 4b

Appendix 4 also sets out the possible capacities and phasings of the potential housing sites. Do you consider the Council has correctly identified the capacities and phasings for the sites? If not, please explain your reasoning and suggested capacity and/or phasing.

Question 4c

Which of the sites in Appendix 4 do you feel should be allocated through the Site Allocations Document? Please explain why you think this.

Question 4d

Are there any sites in Appendix 4 that you would not wish to see allocated? Please explain why you think this.

Question 4e

Do you feel the Council has identified all the possible policy options with regards to housing allocation? If not, please provide details.

Question 4f

Which of the identified policy options do you feel is the most appropriate? Please explain why you think this.

Question 4g

If the Council is required to release sites within Countryside Beyond the Green Belt which of the sites identified in Appendix 4 do you feel the Council should focus on? Please explain your reasoning.

Question 4h

If the Council is required to release sites within Countryside Beyond the Green Belt which of the broad search areas identified in Appendix 5 do you feel the Council should focus on? Please explain your reasoning.

Question 4i

Do you believe the Council should be considering other broad search areas? If so, please identify them and explain why you think they should be considered.

Question 4j

Are there any sites that you feel could be allocated as rural exception sites? If so, please identify them and explain why you think they should be considered.

Housing - Travellers

Policy Context

Planning Policy for Traveller Sites

- 4.63 National planning policy for gypsies, travellers and travelling showpeople is contained in 'Planning Policy for Traveller Sites – March 2012' (PPTS). It should be read alongside the NPPF.
- 4.64 The PPTS states that it is the Government's overarching aim to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.
- 4.65 The PPTS expects local authorities to develop fair and effective strategies to meet need through the identification of land for sites. It is the aim of the Government to ensure that plan-making aims to reduce the number of unauthorised developments and encampments and make enforcement more effective.
- 4.66 The PPTS also expects local authorities to be able to demonstrate an up-to-date five year supply of deliverable sites (Paragraph 9).
- 4.67 Traveller sites are expected to be sustainable economically, socially and environmentally (Paragraph 11).
- 4.68 Paragraph 13 encourages LPA's to consider using a rural exception policy to allocate and release small rural sites outside of settlements solely for affordable traveller provision where there is a lack of provision.
- 4.69 Traveller sites in the Green Belt are identified as inappropriate development and should not be approved except in very special circumstances (Paragraph 14).

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- 4.70 Policy CP7 states that the Borough will seek to provide an additional 19 pitches for Gypsies and Travellers in the period up to 2027. Provision for Travelling Showpeople is to be made in accordance with a review of the GTAA.
- 4.71 Policy DM6 sets out the criteria the Council will have regard to when assessing applications and site allocations for the Travelling community. These are:
- (i) Site should promote the effective use of land within settlement areas in particular previously developed land;
 - (ii) Sites should be accessible to public transport, cycling or pedestrian networks and facilities capable of meeting day to day needs;

The Council will also consider allocations in rural locations outside of the Green Belt giving priority to rural fringe locations that comprise previously developed land and meets criterion (ii) above

Any proposals within the Green Belt will have to demonstrate very special circumstances.

Key facts

Existing provision

4.72 The Borough currently contains 3 authorised Traveller sites:

Kalima, Chertsey Road, Chobham	Publically owned accommodation for gypsies & travellers	15 pitches
Swift Lane, Bagshot,	Publically owned accommodation for gypsies & travellers	15 pitches
Bond Drive, Pennypot Lane, Chobham (Formerly known as Field 2100)	Privately owned accommodation for travelling showpeople	6 plots

4.73 The Borough does not have any of the following types of sites:

- Private gypsy and traveller sites;
- Temporary pitches
- Pitches tolerated for over 10 years

4.74 There is a small population of travellers in bricks and mortar accommodation.

4.75 The Borough has 2 unauthorised sites, each with one unauthorised pitch.

4.76 Surrey Heath experiences fairly regular incursions.

Need

4.77 In 2008 the Council undertook a Gypsy and Travellers Accommodation Assessment (GTAA) in order to understand the accommodation needs of the Surrey Heath travelling community. The GTAA identified a need within Surrey Heath for additional pitches for travellers in line with the following:

- 19 pitches for Gypsies and Travellers between 2006 and 2011;
- 10 plots for Travelling Showpeople between 2006 and 2011.

The need identified via the 2008 GTAA was translated into Policy CP7 of the Borough's adopted Core Strategy. To date, none of the 19 pitches for the gypsies and traveller community have been provided. 6 of the 10 plots required for the travelling showpeople have been delivered.

4.78 The accommodation assessment is currently being up-dated.

Issues

Supply

4.79 The need to find traveller sites is important for the following reasons-

- the borough has an identified need for 19 gypsy & traveller pitches. To date the borough has not been able to meet any of this need;
- the borough does not have an up-to-date 5 year supply of deliverable traveller sites.
- the existing authorised sites in the borough suffer from overcrowding;
- there are currently several unauthorised traveller pitches;
- the borough suffers from fairly regular incursions;

Without a supply of sites the Council will find it hard to resist future applications for the grant of temporary planning permission and to take effective enforcement action against unauthorised sites.

4.80 The Council has not yet identified a supply of potential sites around the Borough which might be capable of being allocated to help deliver the traveller housing requirements of Policy CP7.

4.81 The land take required to provide for 19 pitches is expected to be approximately 1.2ha. This is a small amount when considered in light of the 100 ha or more expected to be needed to provide the 3,240 homes for the settled population in the period 2011 to 2028.

4.82 Despite the small land area that is required to meet the projected accommodation needs of gypsy and travellers no sites have been put forward for allocation. The Council has not yet been able to identify a 5 year supply of sites.

4.83 The identification of sites to meet the needs of the Surrey Heath travelling community will be an important role of the Site Allocations Document.

Distribution of sites

4.84 Existing authorised traveller sites are located in the Green Belt in the eastern part of the Borough. There are no sites in the western urban area, or in other settlements in the Borough. Consideration needs to be given to whether this pattern of distribution should be continued or whether a more even distribution across the Borough should be sought.

4.85 National and local planning policies expect new traveller housing sites to be sustainable. A hierarchy of preference for the location of future Traveller sites is identified in Policy DM6 of the CS&DMP DPD as follows:

- PDL in settlements
- Land within settlements
- Sustainable PDL in rural fringe locations located in areas outside of the Green Belt
- Other Countryside Beyond the Green Belt areas
- Sites in Green Belt that can demonstrate very special circumstances for development.

4.86 When allocating Traveller sites through the Site Allocations Document the Council will need to ensure that sites that meet criteria at the top of the hierarchy are preferred over those lower down. This is likely to give a more even distribution of traveller sites around the Borough.

SANGs

4.87 As Traveller accommodation is a form of residential development it is subject to the constraints of the TBH SPA designation. This means that any net increase in Traveller accommodation is not acceptable within 400m of the SPA and SANG contributions will be required.

4.88 Ensuring a supply of SANG is therefore important to the delivery of Policy CP7.

Options

4.89 The following policy options for the provision of Traveller accommodation is set out in Table 4.7 below:

Ref.	Policy option	Approach	Advantages/disadvantages
1	<i>Do nothing</i>	Rely on sites coming through the Development Management process and not identify or allocate specific sites for Travellers.	<p>This option would leave the Council without a 5 year supply of traveller sites and thus make it vulnerable to sites being imposed through the planning appeal process.</p> <p>The Core Strategy policies are unlikely to be delivered under this option and it represents a high risk strategy in terms of the managed delivery of traveller accommodation.</p>
2	<i>Allocate a series of small sites to meet Policy CP7 across all neighbourhoods</i>	Allocate sites across the Borough to meet the accommodation needs of the travelling community. The sites would be small – up to 3 pitches/plots per site.	<p>This option would introduce traveller sites into new communities in the Borough.</p> <p>The Core Strategy policies in terms of numbers would be delivered under this option. It would also allow for the delivery of sites in accordance with policy DM6</p>

Ref.	Policy option	Approach	Advantages/disadvantages
3	<i>Expand the existing sites to meet Policy CP7 requirements</i>	Allocate sites to meet the accommodation needs of the travelling community through expansion of the existing sites at Kalima, Swift Lane and Bonds Drive.	<p>This option would intensify provision of traveller accommodation at existing locations.</p> <p>The Core Strategy policies in terms of numbers would be delivered under this option. It would further concentrate the provision of sites within the Green Belt and very special circumstances would need to be demonstrated for this approach.</p>
4	<i>Provision of new large sites</i>	Allocate one or more large sites to meet the accommodation needs of the travelling community.	<p>This option could introduce traveller sites into new communities in the Borough.</p> <p>The Core Strategy policies in terms of numbers would be delivered under this option. It would also allow for the delivery of sites in accordance with policy DM6.</p>

Table 4.7 – Traveller Policy Options

Questions to consider

Question 4k

Are you aware of any potential traveller housing sites that could be considered for allocation in the Site Allocations Document? If so, please supply details on the new travellers site form which can be accessed at: <http://www.surreyheath.gov.uk/siteissuesoptions>

Question 4l

Do you feel the Council has identified all the possible policy options with regards to travellers housing allocation? If not, please provide details.

Question 4m

Which of the identified policy options do you feel is the most appropriate? Please explain why you think this.

5. Employment

- 5.1 This section looks at the site allocation issues surrounding the delivery of the Local Plan employment policies. It deals with the existing employment designations, potential new sites, need and supply and the employment issues raised by the NPPF.
- 5.2 The section provides you with:
- A policy context
 - Key employment facts;
 - The issues the Council has identified in relation to this land use;
 - Options
 - Questions to help you to comment

Policy context

NPPF

- 5.3 Securing sustainable economic growth is a key government commitment set out in the NPPF. Local Planning Authorities are expected to help deliver this through:
- Planning proactively to meet the needs of business and support an economy fit for the 21st century (Para 20)
 - Setting out a clear economic vision and strategy for the area (Para 21)
 - Setting criteria or identifying strategic sites to meet anticipated needs over the plan period (Para 21)
 - Supporting existing business sectors and plan for new or emerging sectors likely to locate in the area (Para 21).
 - Provision of flexible policies (Para 21)
 - Identify priority areas for economic regeneration, infrastructure and environmental enhancement (Para 21)
 - Regularly reviewing land allocations to avoid long term protection of employment sites where there is no need (Para 22)
 - Supporting the sustainable growth of all types of businesses in rural area (Para 28).

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- 5.4 Policy RE3 states that, based on the evidence from employment land reviews and other market intelligence, provision should be made for a range of sites to meet needs in locations that are accessible, make efficient use of sites, focus on urban areas and promote public transport.
- 5.5 Policy RE3 also requires the particular needs of rural communities to be addressed.
- 5.6 Policy RE6 identifies the Blackwater Valley as one of the most economically successful parts of the region. The Council is expected, along with other bodies, to actively seek to maintain and enhance its competitiveness.
- 5.7 Policy WCBV2 expects need for additional new employment floorspace to be met through the more efficient use of employment land. Priority is to be given to the retention of existing employment land in employment use.

The Surrey Heath Local Pla

- 5.8 Policy CP8 of the CS&DMP DPD states the Council will make provision for up to 7,5000 new jobs in the period up to 2027. It will do this by ensuring a flexible supply of high quality employment floorspace utilising existing employment areas and promoting more intensive use of sites. Core Employment areas identified on the Policies map will be retained for employment use.
- 5.9 The 2000 Local Plan contains 2 extant saved policies which seek the regeneration of particular areas of the Borough. Saved Policy E6 identifies 2 Employment Revitalisation Areas where the Council will encourage development for business, office and retail floorspace. These areas are located at Yorktown (Nos. 411-543 London Road) and Osnaborough Hill (Nos. 279-299 London Road and nos 309-369 London road with nos 1-17 Frimley Road, Camberley). Saved Policy E8 of the 2000 Local Plan encourages redevelopment of land lying between the A30 and Half Moon Street, Bagshot for industrial, office, residential and some retail.

Key facts

- 5.10 An Employment Land Review (ELR) was undertaken jointly in 2009 with Hart and Rushmoor District Councils. This review concluded that overall the study area has a relatively strong local economy. The service and knowledge sectors are strongly represented with only a modest manufacturing base. The economic strengths of the area are its good transport accessibility, high levels of skills, entrepreneurship and representation of knowledge based growth sectors.
- 5.11 Most of the employment space in Surrey Heath is clustered together in estates located within Camberley and Frimley and they form part of a large business cluster based in and around the Blackwater Valley towns. The estates are gradually undergoing regeneration but are physically constrained with little room for expansion.
- 5.12 There are also several large individual employment sites located in other parts of the borough. Most of these are located in rural areas, rather than settlements.
- 5.13 Surrey Heath has a small office market and over time this role has declined as new and better located business parks have been constructed elsewhere. High vacancy levels have persisted over time and in 2009 were recorded at 21%.⁸
- 5.14 Industrial space in the Borough had low levels of vacancy in 2009 – around 5%.

Issues

Core Employment Areas

- 5.15 The NPPF expects Local Plans to identify sites to meet anticipated employment needs. Need and supply was identified in the 2009 ELR. This found that the existing industrial supply was sufficient to meet future needs while an oversupply of office space was identified. Based on its findings Policy CP8 of the CS&DMP DPD was developed. This sets out a strategy for employment which makes provision for up to 7,500 new jobs in the period to 2027 and relies on ensuring a flexible supply of floorspace using existing employment areas. Retention of the Core Employment Areas for employment is key to this.

8 Employment Land Review for Surrey Heath, Hart and Rushmoor, Nathaniel Lichfield and Partners, November 2009

- 5.16 Although the ELR was undertaken in 2009, its findings, and Policy CP8 on which it is based are still considered to be relevant and up-to-date. The Borough has not experienced pressure in recent years to increase the supply of employment sites and there is an on-going surplus office of sites.
- 5.17 A key issue for the Site Allocations Document will be to consider the appropriateness of the Core Employment Area boundaries and whether they are still suitable to meet the identified employment need. Policy CP8 expects the Core Employment areas to be maintained but their boundaries have not been reviewed since the late 1990's. A number of issues arise in relation to these areas which will need to be addressed through the Site Allocations work:
- There has been recent pressure on the Core Employment Areas in terms of both enlargement and reduction:
 - A number of industrial sites were identified in the 2012 Call for Sites. One of these lies between the Thames Water Sewage Site and the A331. It has been suggested that the Yorktown Core Employment area should be enlarged to include this site. This site is identified in Appendix 6
 - There is a large amount of vacant land within the Lyon Park Industrial Estate which currently is not contributing to economic activity or growth. A planning application has been received to allow part of this land to be used for non-employment activities associated with the nearby Frimley Park hospital
 - Applications and enquiries have been received seeking permission to use various Core Employment Sites for non-employment activities.Consideration needs to be given to whether the Core Employment boundaries need to be adjusted to take into account these market pressures.
 - There remains significant surplus office space within the Core Employment Areas. Consideration needs to be given to whether and how, surplus office sites could be used more effectively to generate the economic growth sought by the NPPF and the Core Strategy.
 - Although the Borough appears to have adequate levels of industrial space to meet its future needs, vacancy rates continue to remain very low, despite the on-going economic recession. In the 2012 Call for Sites several potential new employment sites were put forward. Consideration will need to be given to whether these sites should be formally allocated for employment use. These are identified in Appendix 6.

Employment Revitalisation Area

- 5.18 Parts of the A30 in Frimley and Yorktown suffer from environmental and traffic problems. These areas are on the key route into Camberley Town Centre and can be seen as part of the Town Centre gateway. Saved Policy E6 of the Local Plan 2000 sought to revitalise the areas through comprehensive mixed use schemes involving office, retail, replacement residential and other appropriate uses. These areas are identified on the Policies Map.
- 5.19 Although policies were put in place over 12 years ago to secure the regeneration of these areas little progress has been made in securing their revitalisation. The policy and designation has not been reviewed since that time. The Site Allocations document will need to consider the effectiveness and appropriateness of this policy and designation.

Land at Half Moon Street Bagsho

5.20 The land between the A30 and Half Moon St, Bagshot has been identified for comprehensive redevelopment since 1994. Despite the fact that saved Policy E8 of the 2000 Local Plan has been in existence for 18 years to encourage regeneration of this land no development has yet come forward. The effectiveness and appropriateness of this policy and designation needs to be considered through the Site Allocations Document.

Options

5.21 The options that the Council needs to consider in relation to the Core Employment Areas are:

Ref.	Policy option	Approach	Advantages/Disadvantages
1	<i>Do nothing</i>	Not allocate any new employment sites and maintain the existing Core Employment Area boundaries.	The Core Strategy policies would be delivered under this option and it represents a low risk strategy in terms of the managed maintenance and delivery of employment land.
2	<i>Amend Core Employment Area boundaries</i>	Adjust the boundaries of the Core Employment areas where it was found to be necessary. This could include losses of employment land to reflect current circumstances, but equally it could result in an increase, especially if any of the sites put forward in Appendix 5 were incorporated.	The Core Strategy policies in would be delivered under this option. It represents a low risk strategy in terms of the managed maintenance and delivery of employment land.
3	<i>Delete Core Employment Areas</i>	Remove the Core Employment Area policy designation.	The Core Strategy policy CP8 would not be delivered under this option. It represents a high risk strategy in terms of maintaining and supporting employment in the Borough.

Table 5.1 – Core Employment Policy Options

5.22 The options that the Council needs to consider in relation to the Employment Revitalisation Areas are:

Ref.	Policy option	Approach	Advantages/disadvantages
1	<i>Do nothing</i>	Maintain the existing Employment Revitalisation Area boundaries and retain Policy E6.	This would represent a high approach to the allocation and would be likely to be found unsound.
2	<i>Delete saved Policy E6 and retain existing Employment Revitalisation Area boundaries</i>	The Council would delete saved Policy E6 and maintain the existing boundaries.	The employment revitalisation areas map designation would be unsupported by policy This would represent a high risk approach to the allocation and would be likely to be found unsound.
3	<i>Create policy and retain Employment Revitalisation Area boundaries</i>	Supersede Policy E6 with a new policy to support the Employment Revitalisation Area designation and would maintain the existing boundaries.	This option represents a low risk strategy in terms of maintenance and environmental improvements to this mixed use area.
4	<i>Create policy and amend Employment Revitalisation Area boundaries</i>	Supersede Policy E6 with a new policy to support the Employment Revitalisation Area designation and adjust the boundaries of the Employment Revitalisation Areas where it was found to be necessary. This could include losses of land to reflect current circumstances, but equally it could result in an increase.	This option represents a low risk strategy in terms of maintenance and environmental improvements to this mixed use area.
5	<i>Delete Employment Revitalisation Areas</i>	Remove the Employment Revitalisation Area policy designation and the area to remain unallocated for any specific use.	This option represents a medium risk strategy in terms of maintaining employment in this area and securing environmental improvements.
6	<i>Redesignate Employment Revitalisation Areas</i>	Remove the Employment Revitalisation Area policy designation and replace it with a new designation and policy which supported environmental and character improvements to this the area as part of the gateway approaches to Camberley Town Centre.	This option would facilitate improvements to an area of mixed character which forms a key approach to Camberley town centre. It represents a medium risk strategy in terms of maintaining employment in this area.

Table 5.2 – Employment Revitalisation Areas Policy Options

5.23 The options that the Council needs to consider in relation to the Land at Half Moon St, Bagshot are:

Ref.	Policy option	Approach	Advantages/Disadvantages
1	<i>Do nothing</i>	Maintain saved Policy E8 and the designation boundaries.	Under this option the status quo would be maintained. It would represent a low risk approach to the policy and allocation.
2	<i>Delete saved Policy E8 and retain existing boundaries</i>	Delete saved Policy E6 and maintain the existing boundaries.	The Land at Half Moon Street map designation would be unsupported by policy This would represent a high risk approach to the allocation and would be likely to be found unsound.
3	<i>Create policy and retain Land at Half Moon Street boundaries</i>	Supercede Policy E8 with a new policy to support the Land at Half Moon Street designation and maintain the existing boundaries.	This option represents a low risk strategy in terms of securing improvements to this mixed use area.
4	<i>Create policy and amend Land at Half Moon Street boundaries</i>	Supercede Policy E8 with a new policy to support the Land at Half Moon St designation and adjust the boundaries where it was found to be necessary. This could include losses of land to reflect current circumstances, but equally it could result in an increase.	This option represents a low risk strategy in terms of securing improvements to this mixed use area.
5	<i>Delete Land at Half Moon St policy and designation</i>	Remove the Land at Half Moon St policy and designation.	This option represents a medium risk strategy in terms of securing redevelopment of this mixed use area.
6	<i>Redesignate Employment Revitalisation Areas</i>	Remove the policy designation and Land at Half Moon St policy and designation and replace it with a new designation and policy for uses and purposes not covered by the existing.	This option would allow an alternative scheme to bring forward the redevelopment of the site and improvements to it. It represents a medium risk strategy in terms of maintaining employment in this area.

Table 5.3 – Land at Half Moon St, Bagshot Policy Options

Question 5a

Should any the sites in Appendix 6 be allocated through the Site Allocations Document as employment sites? Please explain why you think this.

Question 5b

Are there any sites in Appendix 6 that you would not wish to see allocated? Please explain why you think this.

Question 5c

Do you feel the Council has identified all the possible policy options with regards to the various employment allocations? If not, please provide details.

Question 5d

Which of the identified policy options do you feel is the most appropriate? Please explain why you think this.

6. Retail

6.1 This section looks at the site allocation issues and options surrounding the delivery of the Local Plan retail policies. The section encompasses the district centres of Frimley and Bagshot as well as the local neighbourhood centres and parades. It does not cover Camberley Town Centre as this will be the subject of a separate development plan document in the form of an Area Action Plan.

6.2 The section provides you with:

- Policy context
- Key retail facts;
- Issues the Council has identified in relation to this land use;
- Options
- Questions to help you to comment

Policy context

NPPF

6.3 The NPPF expects planning policies to be positive and promote competitive town centre environments and set out policies for the management and growth of centres over the plan period.⁹ Local Planning Authorities are expected to help deliver this through:

- Defining the extent of town centres and primary shopping areas (Para 23)
- Allocating a range of suitable sites to meet the scale and type of retail development needed in town centres. LPA's should undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites (Para 23)
- Allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. (Para 23)
- Set policies for consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres(Para 23). This includes an option of locally setting a floorspace threshold for the requirement of impact assessments. (Para 26)
- Encourage residential development on appropriate sites; (Para 23)
- Where town centres are in decline, plan positively for their future to encourage economic activity (Para 23).

6.4 Within rural areas local plans are expected to promote a strong rural economy. Promoting the retention and development of local services and community facilities is seen as part of this (Para 28).

6.5 Paragraph 70 expects Local Plans to:

- plan positively for the provision and use of community facilities and other local services;
- guard against the loss of values community facilities and services; and
- ensure established shops, facilities and services are able to develop in a way that is sustainable.

The South East Plan

6.6 Retail policies in the South East Plan primarily relate to an identified network of strategic town centres. The retail centres that are the subject of this Site Allocations Document are not part of this strategic network.

6.7 Policy TC2 expects plans promote investment of an appropriate scale in town centres.

⁹ The NPPF defines town centres as city centres, town centres, district centres and local centres but excludes small parades of shops of purely local significance.

The Surrey Heath Local Plan

6.8 The hierarchy role of retail centres in the Borough is set out in Policy CP9 of the CS&DMP DPD:

- Town – Camberley
- District – Bagshot & Frimley
- Local – Chobham, Deepcut, Frimley Green, Lightwater and Windlesham
- Neighbourhood – Bisley, West End and other neighbourhood parades.

6.9 Policy DM16 states the Council will consider alterations to the District and Local Centre and Neighbourhood Parade boundaries, changes to primary and secondary frontages and allocation of sites in a Site Allocations DPD.

6.10 The 2012 adopted Policies Map contains several retail designations – Primary Shopping Area and Local Shopping Centre/Parade.

Key facts

6.11 The Borough contains a hierarchy of retail centres serving different catchments and needs. At the top of the hierarchy lies Camberley Town Centre. The remainder of the hierarchy is as follows:

District centres	Bagshot Frimley
Local Centres	Chobham Deepcut, Frimley Green Lightwater Windlesham
Neighbourhood Parades	Bisley West End Mytchett Parade Beaumaris Parade Old Dean Parade London Road/Frimley Road Parade Frimley Road Parade Farm Road Parade Heatherside Parade Chertsey Road, Chobham Parade

6.12 Both Frimley and Bagshot contain designated primary shopping areas and secondary areas in the form of local parades. These are shown on the Adopted Policies Map 2012. The extent of the other smaller retail centres are also identified on the Policies Map as Local Centres and Parades.

6.13 The identified need for retail growth is expected to be largely accommodated in Camberley Town Centre. Other centres, with the exception of Deepcut are not identified as needing to expand to accommodate additional growth although there may be minor changes to primary and secondary frontages.¹⁰

¹⁰ CS&DMP DPD Paragraph 5.62

Issues

- 6.14 National and local planning policy expect Local Plans to define the role and extent of retail centres and plan positively for their management and growth. The CS&DMP DPD sets out a hierarchy of centres and provides pro-active policies to support and enhance the district, local centres and neighbourhood parades. The extent and suitability of the retail designations has not been reviewed since before 2000 and this is an issue that the Site Allocations is expected to address.
- 6.15 The Surrey Heath Retail Study 2007 found that Bagshot and Frimley successfully filled their roles as district shopping centres. There was no indication these centres could support any major expansion of retail uses. The study also found that the centres of Chobham, Frimley Green, Lightwater and Windlesham functioned as local centres. Bisley and West End were found to function only as neighbourhood centres. The study was updated in 2010 to include Deepcut.
- 6.16 A review of the retail centres in 2012 (excluding CTC)¹¹ found that all the retail centres were performing well with very low vacancy rates. In a number of centres potential was identified to expand the retail designations. The review also highlighted the need to correct several of the designations which appear to be incorrectly applied. Table 6.1 sets out the boundary changes proposed by the review. The proposed changes are outlined in Appendix 7 in both table and map form
- 6.17 Appendix 7 of this paper identifies on a local area basis the sites which have been put forward for consideration for allocation as retail sites. Key issues for these sites will be related to need and their compliance with national and local plan policy.

Options

- 6.18 The options that the Council needs to consider in relation to the retail sites are:

Ref.	Policy option	Approach	Advantages/Disadvantages
1	<i>Do nothing</i>	Not allocate any new retail sites and would maintain the existing boundaries of the district, neighbourhood and parade retail centres.	Policy DM12 of the CS&DMP DPD would be delivered under this option and it represents a low risk strategy in terms of the managed maintenance and delivery of the district, neighbourhood and parade retail centres.
2	<i>Amend the retail centre boundaries</i>	Adjust the boundaries of the district, neighbourhood and parade retail centres where found to be necessary. This could include losses of retail land to reflect current circumstances, but equally it could result in an increase.	Policy DM12 of the CS&DMP DPD would be delivered under this option. It represents a low risk strategy in terms of the managed maintenance and delivery of the district, neighbourhood and parade retail centres.

¹¹ Retail Site Survey - Background Paper ; 2012

Ref.	Policy option	Approach	Advantages/Disadvantages
3	<i>Delete the retail area designations</i>	Not allocate any new retail sites and remove the district, neighbourhood and parade designations from the Policies Map.	Policy DM12 of the CS&DMP DPD would not be delivered under this option. It represents a high risk strategy in terms of maintaining and supporting retail uses in the Borough.
4	<i>Allocate new retail sites</i>	Allocate new retail sites as either neighbourhood centres and parades.	Policy DM12 of the CS&DMP DPD would be delivered under this option. It represents a low risk strategy in terms of the managed maintenance and delivery of the district, neighbourhood and parade retail centres.

Table 6.1 – Retail Policy Options

Questions to consider

Question 6a

Should the retail centre boundaries outlined in Appendix 7 be amended? Please explain why you think this.

Question 6b

Are there any sites which currently lie outside of the existing retail designations which you believe should be allocated as either neighbourhood centres or parades? If so, please supply details on the new sites form which can be accessed at <http://www.surreyheath.gov.uk/siteissuesoptions> and explain why you think this.

Question 6c

Do you feel the Council has identified all the possible policy options with regards to retail allocations? If not, please provide details.

Question 6d

Which of the identified policy options do you feel is the most appropriate? Please explain why you think this.

7. Transport

7.1 This section looks at the site allocation issues surrounding the delivery of the Local Plan transport policies. It deals with the existing transport designations, potential new sites, need and the transport issues raised by national policy.

7.2 The section provides you with:

- A policy context
- Key transport facts;
- The issues the Council has identified in relation to this land use as well as issues arising for transport from other land use allocations;
- Options
- Questions to help you to comment

Policy context

NPPF

7.3 The NPPF sees transport policies having an important role to play in facilitating sustainable development but also contributing to wider sustainability and health objectives (Para 29). Local Plans are expected to support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport (Para 30). However, development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe (Para 32).

7.4 Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods and people (Para 35). Local Planning Authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice (Para 41).

The South East Plan

7.5 The focus of the transport policies in the South East Plan is on facilitating and improving sustainable modes of travel.

7.6 In relation to parking a restraint based approach is taken.

The Surrey Heath Local Plan

7.7 Policy CP11 of the CS&DMP DPD states the Council will support proposals to improve public transport in the Borough. It also states that where appropriate, land will be safeguarded. A commitment to working with the highway authority is given to:

- secure improvements to the transport system while reducing the need to travel
- encourage the use of sustainable modes of transport; and
- reduce the impact of traffic on residential areas.

7.8 Policy CP11 also expects new development that will generate high number of trips to be directed towards Previously Developed Land (PDL) in sustainable locations, or be required to demonstrate that it can be made sustainable. All new development is expected to be appropriately located in relation to public transport and the highway network.

7.9 Policy DM11 of the CS&DMP DPD notes that development which would adversely impact flow of traffic on the highway network will not be permitted unless it can be demonstrated that measures to reduce and mitigate impacts to acceptable levels can be implemented.

- 7.10 The 2000 Local Plan contains a number of saved transport policies and designations which are still extant. These are:
- Major Highway Proposals , (saved Policy M1)
 - Additional car parking (saved Policy M4),
 - Rear servicing (saved Policy M9) and
 - Safeguarded Land for Future Public Transport Provision (saved Policy M18).

- 7.11 These policies and designations need to be reviewed through the site allocations work.

Major Highway Proposals

Key facts and issues

- 7.12 Surrey County Council is the highways authority for the Borough of Surrey Heath. The Highways Agency is the highways authority for the strategic road network (SRN), which in Surrey Heath covers the M3. The Borough Council works with the County Council and other partners in seeking to manage impacts on the highway and public transport network and to improve connectivity between people and places.
- 7.13 The Local Plan currently has 2 highway proposal for road improvements. These are set out in Saved Policy M1 and are:
- A322 (Bisley) Southern Extension; and
 - A325, Frimley roundabout
- 7.14 The A322 southern extension was originally part of a bypass proposal for Bisley and West End. However, in 1997 this was formally abandoned by Surrey County Council due to the inability to obtain funding. The intention in 2000 was to promote local highway improvements through the County's own Transport Feasibility Studies, including a proposed Bisley common to Brookwood Crossroads bypass. No progress has been made on the delivery of this scheme and it is not identified in the Council's Infrastructure Delivery Plan 2010-2027.
- 7.15 The improvements to the Frimley roundabout (also known as the Toshiba roundabout) are intended to improve junction capacity and traffic flows at the junction of the A325 and the B3411. The junction is a continued source of traffic delays, particularly as the A325 serves Frimley Park Hospital site. Developer contributions have been collected to deliver the scheme. It is understood that Surrey County Council expect to deliver the improvements by 2015.
- 7.16 The Site Allocations Document will have to consider the justification for retaining or deleting these existing designations.
- 7.17 Although the Site allocations work puts forward potential sites allocation it is not considered likely at this stage that there is a need for any new major highway proposals to accommodate any potential impacts on local roads. A Transport Assessment was undertaken in 2010 by Surrey County Council as part of the work on the Core Strategy. The Assessment looked at the development proposed in the Core Strategy (including the 3,240 net additional homes outlined in Policy CP3). The Transport Assessment did not highlight a need for any major highways infrastructure on the local highway network to support the development set out in the Core Strategy.
- 7.18 The Council continues to work with the Highways Agency, Surrey County Council, Hampshire County Council, Rushmoor Borough and Hart and Bracknell District Councils to assess the cumulative impact of development on the M3. A joint study undertaken by this group (The 'Transport Assessment for the M3 Corridor J3-4A (2011)) found that by 2026 the cumulative

level of development planned within the M3 study area may require mitigation measures on the SRN although this is not seen as a bar to development.

Additional car parking

- 7.19 Saved Policy M4 states that the Council will seek to provide additional short term public car parking provision at:
- land to the rear of the Parade, Frimley
 - land to rear of Half Moon Street and High Street Bagshot as part of any major redevelopment of the land. This parcel of land is subject to a separate employment policy and is considered in detail under the employment section.
- 7.20 In the Local Plan 2000 the Council recognised that there was a shortage of suitable public car parking in Frimley. It was intended to tackle this problem through a combination of management of privately owned carparks and the addition of increased car parking capacity. The Council's Carparking Services have identified that there continues to be a need for additional parking provision in Frimley.
- 7.21 The Council's Carparking Services have indicated that there currently is an overprovision of parking spaces in Bagshot.
- 7.22 A potential new carparking allocation has been identified through the 2012 Call for Sites and is shown in Appendix 8. This suggests extending the car park at Chobham centre to meet local needs. However, no evidence of need has been supplied to support this potential allocation.

Rear Servicing

- 7.23 Policy M9 states that the Council will seek to achieve rear service roads through redevelopment schemes at:
- The rear of No.s 423-469 London Road, Yorktown
 - Rear No.s 319-369 London Road and 1-13 Frimley Road, Camberley
 - Rear of 279-299 London Road, Camberley
 - Land to rear of Half Moon St/High Street, Bagshot

The provision of rear service roads is intended to reduce on-street parking and servicing and assist in a reduction in the number of existing accesses onto the A30.

- 7.24 It is not clear at this stage whether these rear service roads are still required. Further work with Surrey County Council will be needed in this area.

Safeguarded Land for Future Public Transport Provision

- 7.25 Saved Policy M18 states that the Council and the County Council will safeguard land at Sturt Road "Chord", Frimley Green to ensure that inappropriate development does not prejudice its future re-use for rail transport. The "Chord" is a disused railway route on a largely intact embankment which, when last used by trains, linked the main line to London Waterloo with Frimley, Camberley and Bagshot.
- 7.26 Camberley is currently not served by a direct and fast route to London Waterloo. Journey times to London from Camberley are generally 1 hour 15 minutes and involve 1 - 2 changes. The lack of a fast and direct access to London has been identified as a problem for many years, limiting the town's attractiveness to businesses, particularly offices.

- 7.27 A study by Surrey County Council in 1995¹² identified that passenger through-put at Camberley justified better rail services than were provided at that time. The Sturt “Chord” was identified as a possible way of providing the needed direct rail services and improving commuting times. Although the study concluded that re-opening the Chord would not be viable at present, it acknowledged that this could change as a result of Government policies to designed to deter car use. This view was re-inforced in 1996 when the then Secretary of State endorsed his Inspector’s recommendations on an appeal where the proposed development would have led to severance of the embankment contrary to the objectives of the Surrey Structure Plan 1994 and PPG13. As a result of this the Council decided to continue to safeguard the land for a future rail link in the 2000 Local Plan via Policy M18.
- 7.28 The Surrey Structure Plan policies have now been superceded by the RSS and the NPPF. Both of these documents seek to rebalancing the transport system in favour of sustainable transport modes to give people a real choice about how they travel. Where there is robust evidence, the NPPF expects Local Planning Authorities to protect sites which could be critical in developing infrastructure to widen transport choice.
- 7.29 In 2012 the Sturt Road Chord still remains as a disused rail link in open countryside on the edge of Frimley Green. The viability of re-opening the link still remains unresolved but the need for a fast and direct rail route from Camberley to London still also remains.
- 7.30 One of the issues for the Site Allocations work is to address is whether there is robust evidence justifying the identification and protection of the Sturt Road Chord. Further work is being undertaken on this matter as part of the work on the emerging Surrey Rail Strategy.

Options

- 7.31 The options that the Council needs to consider in relation to the Major Highway Proposals are:

Ref.	Policy option	Approach	Advantages/disadvantages
1	<i>Do nothing</i>	Maintain saved Policy M1 and the existing major Highway Proposals designations on the Policies Map.	If the highway improvements are still needed this option represents a low risk strategy in terms of delivery of required highway improvements. If they are not required the approach could be found unsound.
2	<i>New policy and retain major highway proposal boundaries</i>	Create a new policy to support the major highway proposal designation and would maintain the existing boundaries.	This option represents a low risk strategy in terms of delivery of required highway improvements.
3	<i>New policy and amend major highway proposal boundaries</i>	Create a new policy to support the major highway proposal designation and adjust the boundaries where it was found to be necessary.	This option represents a low risk strategy in terms of delivery of required highway improvements.

¹² Rail Line Improvements in Surrey; Surrey County Council; 1995

Ref.	Policy option	Approach	Advantages/disadvantages
4	<i>Delete major highway proposal boundaries</i>	Remove the Major Highway Proposal designation.	If the highway improvements are still needed, this represents a high risk strategy in terms of delivery. If they are not required then it represents a sound approach.

Table 7.1 – Major Highway Proposals Policy Options

7.32 The options that the Council needs to consider in relation to the additional carparking:

Ref.	Policy option	Approach	Advantages/Disadvantages
1	<i>Do nothing</i>	Maintain saved Policy M4 and the existing additional car parking designation on the Policies Map.	If the additional car parking is still needed this option represents a low risk strategy in terms of delivery. If they are not required the approach could be found unsound.
2	<i>Create policy and retain Additional Carparking boundaries</i>	Create a new policy to support the Additional Parking designation and maintain the existing boundaries.	This option represents a low risk strategy in terms of making provision for additional future parking in Frimley.
3	<i>Create new policy and amend Additional carparking boundaries</i>	Create a new policy to support the additional Parking designation and adjust the boundaries of the additional parking designation where it was found to be necessary. This could include losses of land to reflect current circumstances, but equally it could result in an increase, including the designation of new sites.	This option represents a low risk strategy in terms of making provision for additional future parking in Frimley and elsewhere.
4	<i>Delete Additional Carparking designation</i>	Remove the Additional Carparking designation and the area remain unallocated for any specific use.	If the parking improvements are still needed, this represents a high risk strategy in terms of delivery. If they are not required then it represents a sound approach.
5	<i>Redesignate Additional Car Parking designation</i>	Remove the Additional Carparking designation and replace with a new designation and policy for another use.	This option would facilitate improvements to an area of undeveloped land lying to the rear of Frimley Town Centre. If the parking improvements are still needed, this represents a high risk strategy in terms of delivery. If they are not required then it represents a sound approach.

Table 7.2 – Additional Carparking Policy Options

7.33 The options that the Council needs to consider in relation to the rear servicing designation are:

Ref.	Policy option	Approach	Advantages/Disadvantages
1	<i>Do nothing</i>	Maintain existing saved policy M9 and the Rear Servicing designations on the Policies Map.	If the rear servicing is still needed this option represents a low risk strategy in terms of delivery. If they are not required the approach could be found unsound.
2	<i>Create new policy and retain Rear Servicing boundaries</i>	Create a new policy to support the Rear Servicing designation and maintain the existing boundaries.	This option represents a low risk strategy in terms of securing provision for rear servicing.
3	<i>Create new policy and amend Rear Servicing boundaries</i>	Create a new policy to support the rear servicing designation and adjust the boundaries of the designation where found to be necessary. This could include losses of land to reflect current circumstances, but equally it could result in an increase.	This option represents a low risk strategy in terms of providing for rear servicing.
4	<i>Delete Rear servicing designation</i>	Remove the rear servicing designation.	If rear serving is still required in the identified locations, this represents a high risk strategy in terms of delivery. If they are not required then it represents a sound approach.

Table 7.3 – Rear Servicing Policy Options

7.34 The options that the Council needs to consider in relation to the Safeguarded land for Future Public Transport Provision (Sturt Chord):

Ref.	Policy option	Approach	Advantages/Disadvantages
1	<i>Do nothing</i>	Maintain the existing saved policy M18 and retain the Sturt Chord designation on the Policies Map.	If the Sturt Road Chord is still needed this option represents a low risk strategy in terms of delivery. If it is not required the approach could be found unsound.
2	<i>Create new policy and retain Safeguarded land for Future Public Transport Provision (Sturt Chord) boundaries</i>	Create a new policy to support the Sturt Chord designation and maintain the existing boundaries.	If the land still needs to be safeguarded this option represents a low risk strategy. If it is not required it represents a high risk strategy and is likely to be found unsound.

Ref.	Policy option	Approach	Advantages/Disadvantages
3	<i>Create new policy and amend Safeguarded land for Future Public Transport Provision (Sturt Chord) boundaries</i>	Create a new policy to support the Sturt Chord designation and adjust the boundaries of the designation where it was found to be necessary. This could include losses of land to reflect current circumstances, but equally it could result in an increase.	If the land still needs to be safeguarded this option represents a low risk strategy. If it is not required it represents a high risk strategy and is likely to be found unsound.
4	<i>Delete Safeguarded land for Future Public Transport Provision (Sturt Chord designation)</i>	Remove the Sturt Chord designation and the area would return to just having the CBGB designation on it.	If the Sturt Chord designation is still needed, this represents a high risk strategy in terms of delivery. If it is not required then it represents a sound approach.
5	<i>Redesignate Safeguarded land for Future Public Transport Provision (Sturt Chord designation)</i>	Remove the Sturt Chord designation and replace it with a new designation and policy for another use.	If the land still needs to be safeguarded for public transport this represents a high risk strategy in terms of delivery.

Table 7.4 – Sturt Chord Policy Options

Questions to consider

Question 7a

Are there any other sites which should be allocated through the Site Allocations Document as transport sites? Please explain why you think this.

Question 7b

Are there any sites in Appendix 8 that you would not wish to see allocated for transport? Please explain why you think this.

Question 7c

Do you feel the Council has identified all the possible policy options with regards to the various transport allocations? If not, please provide details.

Question 7d

Which of the identified policy options do you feel is the most appropriate? Please explain why you think this.

8. Green spaces

8.1 This section looks at the site allocation issues surrounding the delivery of the Local Plan policies relating to Green Spaces. These are defined as:

- Green spaces within Settlement Areas
- Sites of Nature Conservation Importance (SNCI's)
- Suitable Alternative Natural Green Space (SANGs)

8.2 The section provides you with:

- Policy context
- Key facts about each of the green space types;
- Issues the Council has identified in relation to each green space land use;
- Options
- Questions to help you to comment

Policy context

NPPF

8.3 The NPPF states that planning policies should be based on robust and up-to-date assessments of the needs for open space and opportunities for new provision. Information gained from the assessments should be used to determine what open space is required (Para 73).

8.4 Local communities should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in special circumstances (Para 76).

8.5 Planning policies are expected to identify and map components of the local ecological networks, including locally designated sites of importance for biodiversity. (Para 117)

The South East Plan

8.6 Policy CC8 expects local authorities and partners to work together to plan, provide and manage connected and substantial networks of accessible multi-functional green space. Networks should be planned to include both existing and new green infrastructure.

8.7 The designation and management of green infrastructure will be particularly important in areas where there is a need to enhance the existing environmental capacity of an area.

The Surrey Heath Local Plan

8.8 Policy CP11 of the CS&DMP DPD states the Council will plan for a network of accessible and integrated green infrastructure across the Borough and linked to neighbouring areas.

8.9 Policy CP14a states that the Council will seek to conserve and enhance biodiversity within Surrey Heath. Particular regard will be had to a number of important habitats, including Sites of Nature Conservation Interest (SNCI).

8.10 Under Policy DM15 green spaces within settlements will be identified on the Policies Map. These will be subject to review through the Site Allocations Document.

Green Spaces Within Settlement Areas

Key facts

- 8.11 The Borough contains a significant number of green spaces within its rural and urban settlement areas. These spaces are identified on the Policies Map as Green Spaces within Settlement Areas (Green Spaces). In total 118 Green Spaces have been identified.
- 8.12 These spaces perform a number of roles for the communities they lie in including:
- Formal recreation such as sports grounds, school playing fields and golf courses;
 - Informal recreation such as parks and gardens, playgrounds, allotments, woodlands and amenity areas;
 - Visual breaks in the urban area;
 - Wildlife habitats
- 8.13 A list of these spaces is contained in Appendix 9. This list identifies the neighbourhoods these spaces fall within, along with the reason for their designation.

Issues

- 8.14 The existing Green Spaces were last surveyed some 20 or more years ago and the Local Plan indicates that they need to be reviewed with any amendments, deletions or additions undertaken through the Site Allocations Document.
- 8.15 A survey of the Green Spaces was undertaken in 2012.¹³ The site section criteria methodology is contained in this survey and for the sake of completeness we are also publishing and consulting on this survey as part of the background evidence to this Issues and Options Paper.
- 8.16 The 2012 Green Space Survey found that:
- the majority of the spaces still functioned in accordance with their original designation (106 Green Spaces)
 - 2 sites could potentially be deleted
 - 10 sites potentially needed boundary amendments
 - 8 potential new green space sites.
- 8.17 Appendix 9 lists all the existing and potential Green Space sites with the survey findings and identifies in map form those sites where the potential for change has been identified. Consideration will need to be given through the Site Allocations process to whether these potential changes should be included within the Green space network designations.
- 8.18 Paragraphs 76 to 77 of the NPPF makes provision for local communities to identify for special protection green areas of particular significance to them. These spaces, (Local Green Spaces) should only be designated when a Local Plan is prepared or reviewed and must be capable of enduring beyond the end of the plan period. The NPPF goes on to state that the Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used where the green space is:
- reasonably close to the community it serves and is local in character and not an extensive tract of land;
 - demonstrably special to the local community and holds a particular local significance.

13 Surrey Heath Site Allocations Background Paper – Urban Green Space Survey; Surrey Heath Borough Council, December 2012

Paragraph 78 states that the policy for managing development within a Local Green Space should be consistent with policy for Green Belts.

- 8.19 The existing Green spaces within Settlement Areas meet the criteria for the spaces to be local in character, close to the communities they serve and most are relatively small in extent. In line with the NPPF requirements, the Site Allocations work will need to explore whether the local community wish to identify any of the Green spaces within Settlement Areas for special protection and to be treated akin to Green Belt areas. This could be all or just some of these spaces. Consideration will also need to be given to whether a specific policy should be created to support any Green Space designation.
- 8.20 Consideration also needs to be given to whether the proposed green space network on the PRB site in Deepcut should be identified and included within the urban green space network. The broad location of the key green space elements such as the village green, school and park have been identified through the Deepcut Supplementary Planning Document (SPD). Although there are other key elements, these are expected to lie outside of the Deepcut settlement and thus are not likely to form part of any urban green space network. Designation of the village green, park and school playing field through the Site Allocations DPD would fix the boundaries of these spaces, give them a policy protection and help ensure their delivery. Consideration needs to be given to whether the precise boundaries of these spaces should be fixed through the Sites DPD.

SNCI

Key facts

- 8.21 The Borough contains 58 spaces which are designated for their local nature conservation importance. These spaces are found in both rural and urban areas and range in size from 0.5 to 139ha.
- 8.22 The SNCI spaces form part of the Borough's green infrastructure network and are protected through policies CP13 and CP14 of the CSDMP DPD. The existing spaces are shown on the 2012 Policies Map and are identified on a local basis in Appendix 8.

Issues

- 8.23 The SNCI sites shown in the 2012 Proposals Map were based on surveying undertaken some 10 or more years ago. The designations are expected to be reviewed through the Site Allocations Document.
- 8.24 Surrey Wildlife Trust, on behalf of Surrey Heath Borough Council, undertook re-surveying of the SNCI sites in 2011 & 2012. The Trust based their surveying and appraisal of the sites on the Guidance for the Selection of SNCIs in Surrey 2008. For the sake of completeness we will publish and consult on this methodology for the selection of Surrey Heath's SNCIs alongside this Issues and Options Paper.
- 8.25 Appendix 10 lists all sites with the survey findings and identifies in map form those sites where the potential for change has been identified. Consideration needs to be given to the extent and appropriateness of each of the SNCI designations and whether these potential changes should be included within the SNCI network designations.

SANG's

Key facts

- 8.26 The Borough lies entirely within 5km of the Thames Basin Heaths Special Protection Area (TBH SPA) and thus any net new residential development must provide appropriate measures to avoid adverse effects on the SPA. One of the key avoidance measures used by the Borough is SANG. These semi natural or natural spaces are intended to act as alternative informal recreation areas to the SPA
- 8.27 Policy CP14a of the Core Strategy sets out the requirement for net new residential development to provide or contribute to the provision of SANG. Policy CP14a states that SANG will be provided at a standard of at least 8ha per 1,000 new occupants. Policy CP13 of the Core Strategy protects the long term status of these sites by recognising them as forming a strategic part of the Borough's Green infrastructure network.
- 8.28 More detailed guidance relating to SANG is provided in the Thames Basin Heaths Special Protection Area Avoidance Strategy SPD (2012). Paragraph 5.13 of the SPD states that SANG are expected to be provided and funded "in perpetuity".
- 8.29 The Borough currently has five operational SANG of which only one has capacity:

SANG	Neighbourhood	Status ¹⁴	Public or Private?
Chobham Place Woods,	Chobham	Full	Public
Clewborough House School	Deepcut	Full	Public
Diamond Ridge Woods	Camberley	Full	Public
Hawley Meadows and Blackwater Valley	Camberley	Open	Public
Notcutts	Bagshot	Full	Private

Table 8.1: Existing SANG in Surrey Heath

Issues

- 8.30 SANG are important recreational spaces which form part of the Borough's Green Infrastructure (Policy CP13). They are expected to be provided in perpetuity. Other green spaces in the borough (urban green spaces and SNCI's) are currently identified on the Policies Map but the SANG spaces are not.
- 8.31 Of the five existing SANG identified four are full and the 5th is expected to be full very shortly. There is an urgent need for the Council to identify further SANG to support the housing development set out in the Core Strategy.
- 8.32 Table 8.2 sets out potential SANG sites which have been suggested to serve Surrey Heath's need. The location and extent of these sites is identified in Appendix 11.

¹⁴ Surrey Heath Site Allocations Background Paper – Urban Green Space Survey; Surrey Heath Borough Council, December 2012

Potential SANG	Size (ha)	Suggested by?
Land to East of St Catherine’s Road & North of Lake Road, Deepcut	26	Developer
Frimley Fuel Allotments, Deepcut	24	Developer
New Road, Bagshot	25	Developer
Woodlands Lane, Windlesham	10	Developer
Little Heath Nursery, Chobham	2	Developer
Pankhurst Farm, West End	8	Developer
Old House Lane, West End	3	Developer
Heather Farm, Chobham	? ²	Council
Bisley Common, Bisley	24	Council

Table 8.2: Potential SANG sites

SANG have also been suggested at Snow’s Ride, Windlesham and at the former DERA site, Chobham to serve development needs of other Borough’s.

- 8.33 All of the developer suggested SANG are associated with housing proposals. Some are of sufficient size that they may have the capacity to meet some of the Borough’s wider SANG needs. Some are only capable of serving their own SANG requirement. Consideration will need to be given in the Sites DPD to the suitability of these SANG proposals and whether any should be identified as potential SANG on the Policies Map.
- 8.34 Paragraph 5.107 of the CS&DMP DPD states that the Site Allocations Document will identify SANG to support Policy CP13 of the Core Strategy. Consideration needs to be given to how the SANG spaces will be treated. In particular, whether the Policies Map should show existing and potential SANG, and whether their status should be shown.

Green Space Options

8.35 The options that the Council needs to consider in relation to the Green Spaces within Settlement Areas are:

Ref.	Policy option	Approach	Advantages/Disadvantages
1	<i>Do nothing</i>	No change to the existing green space designations on the Policies Map.	Policy DM15 of the CS&DMP DPD would be delivered under this option and it represents a low risk strategy in terms of the managed maintenance and delivery of urban green spaces.
2	<i>Amend the Green Space boundaries</i>	Adjust the boundaries of the green space designations where found to be necessary. This could include losses of land to reflect current circumstances, but equally it could result in an increase in size of the existing sites and the designation of new sites.	Policy DM15 of the CS&DMP DPD would be delivered under this option and it represents a low risk strategy in terms of the managed maintenance and delivery of green spaces.
3	<i>Delete the Urban Green Space designation</i>	Remove the Green Space designations from the Policies Map and the area would remain unallocated for any specific use.	Policy DM15 of the CS&DMP DPD would not be delivered under this option. It represents a high risk strategy in terms of maintaining and supporting green space uses in the Borough.
4	<i>Re-designate Green Space land</i>	Remove the Green Space designation from the Policies Map and replace it with a new type of designation for another use.	Policy DM15 of the CS&DMP DPD would not be delivered under this option. It represents a high risk strategy in terms of maintaining and supporting green space uses in the Borough.
5	<i>Designate all Green Spaces as Local Green Spaces and create policy</i>	Designate all Green Spaces within Settlements as Local Green Spaces on the Policies Map and rely on Policy DM15 of the CS&DMP DPD.	Paragraph 76 of the NPPF would be delivered although designation of all the Green Spaces within Settlements may not be in accordance with the NPPF requirements relating specialness.
6	<i>Designate some of the Green Spaces as Local Green Spaces and create policy</i>	Designate all Green Spaces within Settlements as Local Green Spaces on the Policies Map and create a policy to support and manage the designation.	Policy DM15 of the CS&DMP DPD and Paragraph 76 of the NPPF would be delivered under this option.
7	<i>Designate no Local Green Spaces</i>	No Local Green Spaces would be identified on the Policies Map.	-

Table 8.2 – Green Space Policy Options

8.36 The options that the Council needs to consider in relation to the SNCI's are:

Ref.	Policy option	Approach	Consequences
1	<i>Do nothing</i>	Maintain the existing SNCI designations on the Policies Map.	Policy CP14a of the CS&DMP DPD would be delivered under this option and it represents a low risk strategy in terms of the managed maintenance and delivery of SNCI's.
2	<i>Amend the SNCI boundaries</i>	Adjust the boundaries of the SNCI designations on the Policies Map where it was found to be necessary. This could include losses of land to reflect current circumstances, but equally it could result in an increase.	Policy CP14a of the CS&DMP DPD would be delivered under this option and it represents a low risk strategy in terms of the managed maintenance and delivery of SNCI's.
3	<i>Delete the SNCI designation</i>	Remove the SNCI designation on the Policies Map and the area would remain unallocated for any specific use.	Policy CP14a of the CS&DMP DPD would not be delivered under this option. It represents a high risk strategy in terms of maintaining and supporting SNCI uses in the Borough.
4	<i>Redesignate SNCI land</i>	Remove the SNCI designation on the Policies Map and re-designate land for a new type of use.	Policy CP14a of the CS&DMP DPD would not be delivered under this option. It represents a high risk strategy in terms of maintaining and supporting SNCI uses in the Borough.

Table 8.3 –Sites of Nature Conservation Importance Policy Options

8.37 The options that the Council needs to consider in relation to SANG are:

Ref.	Policy option	Approach	Advantages/disadvantages
1	<i>Do nothing</i>	Not designate any SANG on the Policies Map.	Failure to protect sites for SANG may undermine delivery of future housing. Policy CP3 of the CS&DMP DPD may not be delivered under this option.

Ref.	Policy option	Approach	Advantages/disadvantages
2	<i>Designate existing SANG</i>	Show existing SANG areas on the Policies Map. This would include full and operational SANG.	<p>Policy CP13 of the CS&DMP DPD would be delivered under this option.</p> <p>It represents a low risk strategy in terms of maintaining and supporting SANG uses in the Borough but it does not address future housing need.</p>
3	<i>Designate existing and proposed SANG</i>	Show existing and future SANG commitments on the Policies Map.	<p>Policy CP13 of the CS&DMP DPD would be delivered under this option.</p> <p>It represents a low risk strategy in terms of maintaining and supporting SANG uses in the Borough. It would also provide help to provide certainty around the delivery of housing in the Borough.</p>
4	<i>Designate existing SANG and create a policy to provide selection criteria for new SANG</i>	The Council would show existing SANG areas on the Policies Map and create a policy which set out the site selection criteria for new SANG.	<p>Policy CP13 of the CS&DMP DPD would be delivered under this option.</p> <p>It represents a low risk strategy in terms of maintaining and supporting SANG uses in the Borough. It would also provide help to provide certainty around the delivery of new SANG in the Borough.</p>

Table 8.4 –SANG Policy Options

Questions to consider

Question 8a

Are there any sites which you believe should be included within the green space network and SNCI network which are not currently designated? If so, why? Please provide details of the site on the New Sites Form which can be accessed at: <http://www.surreyheath.gov.uk/siteissuesoptions>

Question 8b

Are you aware of any potential SANG sites which have not been identified in this Issues and Options Paper? Please provide details using the New Sites Form which can be accessed at: <http://www.surreyheath.gov.uk/siteissuesoptions>

Question 8c

Do you feel the Council has identified all the possible policy options with regards to Green space, SNCI's and SANGs? If not, please provide details.

Question 8d

Which of the identified policy options do you feel is the most appropriate? Please explain why you think this.

Question 8e

Do you feel any of the green spaces should be identified for special protection as Local Green Spaces? If so, which spaces and why do you think this?

Question 8f

Do you feel any of the proposed green spaces on the Princess Royal Barracks Site should be identified through the Site Allocations Documents as Green Spaces within Settlement Areas? If so, which spaces should be identified? Should any of these spaces be identified as Local Green Spaces? If so, why?

Question 8g

Do you have any comments on the site selection criteria for the Green Spaces in Settlements and the Sites of Nature Conservation Importance. Do you feel these are appropriate methodologies for the selection of these type of sites within Surrey Heath?

9. Major Developed Sites in the Green Belt

9.1 The Borough contains a number of sites that are designated on the 2012 Policies Map as Major Development Sites in the Green Belt (MDS). This section looks at the MDS policies and designations.

9.2 The section provides you with:

- Policy context;
- Key facts;
- Issues the Council has identified in relation to this land use;
- Options
- Questions to help you to comment

Policy context

NPPF

9.3 MDS were introduced through the 1995 Planning Policy Guidance Note 2: Green Belts. It recognised substantial developed sites such as civil airfields, military establishments and educational establishments were located in the Green Belt and often predated its designation. To provide continuing operational flexibility for these type of green belt sites the Major Developed Sites designation was introduced which allowed limited infilling within the defined boundary.

9.4 PPG2 has now been replaced by the NPPF. The NPPF takes a more permissive approach to development in the Green Belt, allowing for the limited infilling or the partial or complete redevelopment of brownfield land, provided it would not have a greater impact on the openness of the Green Belt and the purposes of including land within it than the existing development (Paragraph 89). The NPPF does not refer to an MDS designation.

The South East Plan

9.5 Policy H1 notes that the housing target for Runnymede includes 2,500 homes for the re-use of the former DERA site. The precise housing contribution from this site will be tested in accordance with Policy LF6 and the allocation will be delivered in the period 2016-2026.

9.6 Policy T9 states that Local Plans will include policies that take account of airport operator masterplans produced in accordance with the Air Transport White Paper.

9.7 Policy LF6 deals specifically with the DERA site. It states that large-scale mixed use development will be brought forward on the site to meet wider regional needs. The precise scale of development, mix of uses and provision of avoidance and mitigation measures to protect the TBH SPA and other European sites and the review of the Green Belt boundaries will be tested through local plans.

The Surrey Heath Local Plan

9.8 Saved Policy RE17 of the Local Plan 2000 deals with Major Developed Sites in the Green Belt. It identifies 3 MDS -

- Fairoaks Airport, Chobham
- DERA Test and Evaluation Centre, Chobham
- Gordons School, West End

These three sites are designated on the 2012 adopted Policies Map as MDS.

- 9.9 The policy deals primarily with the DERA and Gordons School MDS and sets out a number of criteria for infilling and redevelopment on the sites.
- 9.10 Development at Fairoaks airport is subject to Saved Policy M21 of the Plan. This policy is based on the former Surrey Structure Plan policy which identifies the airport as having limited potential for the development of business aviation facilities, subject to limitations. Saved Policy M21 sets out criteria for infilling and redevelopment of the site.
- 9.11 Policy CP1 of the CS&DMP DPD states that Green Belt boundaries will be maintained and that any change to the boundaries of the MDS will be considered through the Site Allocations DPD.
- 9.12 The explanatory text of Policy CP11 of the CS&DMP DPD refers to Fairoaks Airport as an MDS and states that the Council expects the future development of the site to be addressed through an airport masterplan to support its identification as an MDS.

Key facts and Issues

Former DERA Site

- 9.13 The former DERA site lies in the Green Belt and adjacent to Chobham Common (an area that is subject to multiple nature conservation designations including SSSI and SPA). The majority of the site lies within Runnymede Borough Council's area and only a small portion falls within Surrey Heath.
- 9.14 DERA has a specific policy relating to it in the South East Plan and was identified as an MDS in Runnymede's 2001 Local Plan . The small portion of the site lying within Surrey Heath was given the same designation in the 2000 Local Plan to ensure consistency.
- 9.15 Policy LP08 of Runnymede's Pre-submission Local Plan Core Strategy 2013 identifies the vision for that part of the former DERA site lying in Runnymede to be a mixed use community delivering 1500 homes, 79,000 m2 of employment development , educational facilities, upgrades to Longcross station, measures to mitigate adverse impacts on the TBH SPA plus accompanying infrastructure. Policy SP01 states that the site will be taken out of the Green Belt. The former DERA site will lose its MDS designation as a consequence.
- 9.16 Runnymede are already in receipt of planning applications for the redevelopment of the site and further applications are expected to be submitted over the next few years.
- 9.17 The Surrey Heath component of the DERA site lies entirely within the 400m SPA buffer zone and thus its development potential is extremely limited. It is widely anticipated that the Surrey Heath component will be used as SANG to serve the housing development taking place on the Runnymede part of the site.
- 9.18 The Site Allocations Document will have to address whether an MDS designation is still appropriate for the Surrey Heath component of the former DERA site.

Gordons School

- 9.19 In the 1990's Gordons School was keen to expand its 6th form capacity. Designation of the core area of the school as a MDS was designed to help the school facilitate limited infilling and redevelopment as part of this expansion programme. Since the adoption of the 2000 Local Plan the school has obtained permission for expansion of its teaching and sports facilities.
- 9.20 Gordons School MDS would be classed as brownfield land and benefit from the concessions given by Paragraph 89 of the NPPF. The Sites DPD therefore needs to consider whether the extant MDS designation and the related saved policy RE17 is still required, or whether alternative policies and designations are needed to facilitate the productive use of the site.

Fairoaks Airport

- 9.21 Fairoaks Airport was identified in the 1994 Surrey Structure Plan as a General Aviation airport with limited potential for expansion for business aviation facilities. In response the Surrey Heath Local Plan 2000 designated the built up area of the airport as an MDS and also subject it to Saved Policy M21. The large open area of the airfield runway and surrounding space is in Green Belt but not subject to the MDS designation or Saved Policies RE17 and M21.
- 9.22 The Council recognises and supports Fairoaks Airport's role as a provider of business aviation services and an important local employer. The Council expects the future development needs of the site to be addressed through an airport masterplan. This approach is supported by Policy T9 of the South East Plan which requires Local Plan policies to take account of airport operator masterplans produced in accordance with the Air Transport White Paper. To date no airport masterplan has been prepared for Fairoaks Airport. Production of such a document will be critical to the development of future planning policies for the Airport.
- 9.23 Fairoaks Airport MDS would be classed as brownfield land and benefit from the concessions given by Paragraph 89 of the NPPF. The Site Allocations Document therefore needs to consider whether the MDS designation and the related saved policies Re17 & M21 are still required, or whether alternative policies and designations are needed to facilitate the productive use of the airport.
- 9.24 Overall, given the loss of the MDS designation in National planning policy, the Site Allocations Document will need to establish whether there are any local circumstances that would justify continuing with the MDS designation.

Options

9.25 The options that the Council needs to consider in relation to the MDS designation are:

Ref.	Policy option	Approach	Advantages/disadvantages
1	<i>Do nothing</i>	Retain the existing MDS saved Policy RE17 and maintain the MDS boundary on the Policies Map.	<p>If development on the site still needs to be supported with specific policies this option represents a low risk strategy.</p> <p>If not, it represents a high risk approach to the allocation and would be likely to be found unsound.</p>
2	<i>Retain saved Policy RE17 and amend MDS boundaries</i>	Retain the existing MDS saved Policy RE17 and amend the MDS designations boundaries.	<p>If development on the site still needs to be supported with specific policies this option represents a low risk strategy.</p> <p>If it is not required it represents a high risk strategy and is likely to be found unsound.</p>
3	<i>Create new policy and retain existing MDS boundaries</i>	Create a new MDS policy to support the MDS designation and maintain the MDS boundary on the Policies Map.	<p>If development on the site still needs to be supported with specific local policies this option represents a low risk strategy.</p> <p>If there are no local circumstances it represents a high risk strategy and is likely to be found unsound.</p>
4	<i>Create new policy and amend MDS boundaries</i>	Create a new MDS policy to support the MDS designation and adjust the boundaries of the designation where it was found to be necessary. This could include losses of land to reflect current circumstances, but equally it could result in an increase.	<p>If development on the site still needs to be supported with specific policies this option represents a low risk strategy.</p> <p>If it is not required it represents a high risk strategy and is likely to be found unsound.</p>
5	<i>Delete policy RE17 and the MDS designation</i>	Delete saved Policy RE17 and remove the MDS designation. The area would be not be allocated for any specific use apart from Green Belt.	<p>If the MDS designation is still needed, this represents a low risk strategy in terms of facilitating on-going productive use of the site as the policies of the NPPF will prevail.</p> <p>If it is not required then it represents a sound approach.</p>
6	<i>Re-designate</i>	Remove the MDS designation and replace it with a new designation and policy for another type of use e.g. SANG, employment, transport.	This could provide a tailor-made approach to the needs of the occupants of the site.

Table 9.1 – MDS in GB Policy Options

Questions to consider

Question 9a

Do you feel the Council has identified all the possible policy options with regards to Major Developed Sites in the Green Belt? If not, please provide details.

Question 9b

Which of the identified policy options do you feel is the most appropriate for each of the MDS sites? Please explain why you think this.

Question 9c

How compliant is the MDS policy with the NPPF? Do you feel there are any local circumstances that would justify Surrey Heath continuing with the MDS designation?

Glossary

AA	Appropriate Assessment
AAP	Area Action Plan
Camberley Town Centre AAP	A formal DPD which will establish a planning framework for Camberley Town Centre – an area which is intended to be subject to change. The purpose of the AAP is to set out a strategy and proposals for the regeneration of the Town Centre.
Core Strategy	A document which provides an overarching strategy for planning development in Surrey Heath up until 2028.
CS&DMP DPD	Core Strategy and Development Management Policies Development Plan Document
CTC	Camberley Town Centre
HRA	Habitats Regulation Assessment
NPPF	National Planning Policy Framework
PDL	Previously developed land
PRB	Princess Royal Barracks, Deepcut
PPTS	Planning Policy for Traveller Sites
Policies Map	An Ordnance Survey based map showing how the policies in the adopted Local Plan are applied geographically.
Proposals Map	The name for a Policies Map prior to the introduction of the Local Planning Regulations in March 2012.
RSS	Regional Spatial Strategy. Also known as the South East Plan.
SA	Sustainability Appraisal. An SA is required on all emerging DPD's by the Planning and Compulsory Purchase Act 2004. The SA involves identifying the impacts of the emerging DPD on the economy, the community and the environment.
SAC	Special Area of Conservation.
SANG	Suitable Alternative Natural Greenspace
SEA	Strategic Environmental Assessment. European Directive 2001/42/EC requires an Environmental Assessment of plans and programmes to identify any significant effect on the environment. This is commonly known as SEA.
Sites Allocations Document	An abbreviated form of the Site Allocations Development Plan Document
SPA	Special Protection Area
SPD	Supplementary Planning Document
SNCI	Sites of Nature Conservation Interest
SPA	Special Protection Area
SRN	Strategic Road Network
TBH SPA	Thames Basin Heaths Special Protection Area
WUA	Western Urban Area