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Council**
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24th January 2025

Dear Ms Crosby,

Surrey Heath Local Plan: 2019-2038 – Local Plan Examination

Further to my letter dated 16th January 2025 I am writing to respond to your Initial Questions set out in document ID1 regarding the evidence base as set out below:

Q2. The Council explain in their letter dated 10 December, which accompanies the submitted Plan, that since the publication of the Pre-Submission Local Plan in the summer of 2024 the Council has at the request of the Environment Agency commissioned and substantiality completed an updated Strategic Flood Risk assessment and is also in the process of preparing an updated Water Cycle Study. Can the Council please provide a realistic timescale for the completion of this work and whether it is considered that further consultation will be required with the Environment Agency and/or representors on its contents.

SHBC Response

Completion dates for the updated Strategic Flood Risk Assessment (SFRA) and the Water Cycle Study (WCS) are as set out below:

SFRA Level 1 – The Strategic Flood Risk Assessment Level 1 has now been completed and will be published shortly. Please note that mapping associated with the Level 1 Strategic Flood Risk Assessment will be [externally hosted](#).

SFRA Level 2 – The Council has agreed with consultants that the Level 2 Strategic Flood Risk Assessment will be completed by 28th March 2025, subject to there being no significant implications arising from the publication of updated NaFRA2 data that necessitate the undertaking of additional site analysis.

Sequential and Exceptions Test Paper – as above, the Council has programmed that the Sequential and Exceptions Test Paper will be completed by 28th March 2025, subject to there being no significant implications arising from the publication of updated NaFRA2 data later this month.

Water Cycle Study – 28th March 2025

Following completion of the studies it is not anticipated that any further engagement will be required with the Environment Agency on these studies as they have been engaged in the preparation of the studies, including in setting the study briefs, providing relevant information,

commenting on drafts and where possible signing off the final studies. For the SFRA this engagement reflects the cost recover agreement between the Council and the EA in order to support timely engagement.

In the Council's view, the Level 1 Strategic Flood Risk Assessment (SFRA) has not raised issues that would need consulting on with representors or more widely.

It is relevant to note that the outcomes of the SFRA 2021 and the SFRA 2025 are not dissimilar. The extent of Flood Zone 3a and risk of surface water flooding are identical across the studies, whilst key differences between the documents can be summarised as follows:

- Minor refinement to the extent of Flood Zone 2 in the vicinity of Mytchett;
- Flood Zone 3a has been used as a proxy for FZ3b in the absence of modelling for the Bourne catchment;
- Further detailed mapping provided in respect of reservoir flooding and groundwater emergence.

Taking account of the similarities between the studies, the level of flood risk associated with the sites identified within Policies HA1 – HA4 have not, in the Council's opinion, materially changed.

Notwithstanding the above, it is recognised that the Level 1 SFRA (2025) proposes a more conservative methodology for the undertaking of the Sequential Test. The Sequential Test is currently being updated in accordance with the revised methodology and may result in a small number of additional sites being taken through the Exceptions Test than set out in the Interim Sequential and Exceptions Test. The Council does not consider that these revisions will raise issues that would need consulting on.

Q3. It seems the Council is also preparing an updated Strategic Land Availability Assessment and 5 Year Housing Land Supply Statement with an expected completion date of January 2025. Can a more detailed completion date be provided and information on whether the findings are likely to delay the examination

SHBC Response

The SLAA 2024 update and updated 5 Year Housing Land Supply will be completed by 14 February 2025, alongside the further information requested by the Inspector. The SLAA update will not in the opinion of the Council delay the Examination but will actually assist the timely progression of the Examination by providing the most up-to-date housing delivery information to update the SLAA 2023. The 5 Year Housing Land Supply Statement will set out a 5-year supply at adoption based on the Submitted Pre-Submission Surrey Heath Local Plan 2019-2038 housing requirement.

Q4. The Council are working on an updated Indoor and Built Facilities Assessment with completion anticipated in February 2025. Again, what are the consequences of this likely to be for the examination

SHBC Response

In the opinion of the Council, the Indoor and Built Facilities Assessment will have no material consequences for the Local Plan Examination but will provide up to date evidence to support the application of Policy IN7: Indoor and Built Sports and Recreational facilities through the planning application determination process.

Q5. PINS Procedure Guide for Local Plan Examinations (August 2024) advises that Councils must play their part in ensuring that Plans are taken through the examination as quickly and efficiently as possible by ensuring that when they submit their plan it is ready for examination and the evidence base is complete. Can the Council please also explain why the Plan has been submitted for examination with incomplete evidence base and what it is doing to minimise the delay in the examination?

SHBC Response

The Council considers that it is playing its part in ensuring that its Plan is taken through the examination as quickly and as efficiently as possible. This must be viewed in the context of transitional provisions and the advanced stage that the Local Plan has reached and the need for up-to-date Plans to be in place as swiftly as possible. The Council considers that the balance it has struck is calculated to best achieve these imperatives.

The Council considers that it has a robust and substantial evidence base to support the Local Plan. There are a very limited number of evidence base updates that are not yet complete and these are, with the exception of the SLAA update, in response to representations from the Environment Agency and Sport England and the need for these was only identified at a late stage in the plan-making process. However, as these requirements relate to updates to earlier studies, those studies have provided a solid evidential base.

The impacts of these evidence updates on the Examination process are set out in response to the questions above, with the SFRA level 1 now ready for publication and the SLAA to be complete by 14th February. The Council has sought to mitigate impacts by engaging constructively and on an ongoing basis with key bodies, including the Environment Agency and Sport England.

Turning to the specific evidence base studies, in the case of the SFRA the Council has already published a SFRA in 2015 and a further SFRA in 2021. A Sequential Test and an Exceptions Test have been produced and were also submitted with the Local Plan, however, following the production of the latest SFRA 2025 these require updating. The SFRA update has also identified the need for a level 2 SFRA for 8 specific sites. However, the emerging outcomes from the studies have been discussed with the Council's consultants and the EA, and in order to take account of emerging findings at the earliest possible stage.

A Water Cycle Study was published in 2017, and an update is at an advanced stage of production. The need for an update was identified by the EA at the Regulation 19 stage and has been progressed as quickly as possible by the Council's consultants in discussion with the EA and Thames Water. It is expected that the study will identify the need for mitigation measures and that these will be addressed at a site-specific level through the planning application determination process.

An Indoor Facilities Assessment was published in 2016 and as noted above, an updated Indoor and Built Facilities Assessment is timetabled to be completed in February. The Council has engaged Sport England and relevant bodies during the process of preparing the assessment, to limit the risk of delay to the completion of the Assessment. Notwithstanding this, as set out above, it is not envisaged that the outcomes of the Assessment will have any material impact upon the Local Plan Examination. The Assessment would however provide up to date data sufficient to inform the determination of planning applications as relevant.

The purpose of the SLAA update we are currently completing is to update the Submitted SLAA in order to ensure the most up-to-date housing delivery information is available to inform the Examination Hearing Sessions. The SLAA update 2024 builds on the content on the SLAA 2023 and provides the most up to date position on completions, permissions and the deliverability and developability of sites.

The Council is minimising the delay in the Examination by progressing these further evidence base studies as quickly as possible, principally through the appointment of consultants to undertake the studies and through early and ongoing engagement with relevant bodies, including principally the Environment Agency and Sport England. In the case of the Environment Agency the Council entered into a Service Level Agreement, for the SFRA, where it is required to pay for advice on the progression of the evidence base studies with the objective of ensuring timely input from the EA. In addition, the Council has entered into early discussion of potential impacts and mitigation with relevant bodies.

The Council has set out previously in this letter, a timetable for the completion and publication of the additional evidence. This sets out that all the further evidence identified will be completed before the end of March 2025. Furthermore, the Council hopes that by proactively engaging with bodies in the production of these studies and seeking to agree the outcomes, that its approach will reduce the areas of disagreement between parties and the number of Hearing sessions required as part of the Local Plan Examination.

As set out in my letter of 16th January, the Council will respond to your remaining Housing questions set out in ID1 by 14th February.

Should you require any further information please do not hesitate to contact me.

Yours sincerely,

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