

**SURREY COUNTY COUNCIL**

**CABINET MEMBER FOR TRANSPORT & INFRASTRUCTURE**



**DATE: 26 APRIL 2022**

**LEAD OFFICER: KATIE STEWART, EXECUTIVE DIRECTOR FOR ENVIRONMENT, TRANSPORT AND INFRASTRUCTURE**

**SUBJECT: SURREY COUNTY COUNCIL RESPONSE TO SURREY'S 2050 PLACE AMBITION CONSULTATION**

**ORGANISATION STRATEGY PRIORITY AREA: GROWING A SUSTAINABLE ECONOMY SO EVERYONE CAN BENEFIT/ TACKLING HEALTH INEQUALITY/ ENABLING A GREENER FUTURE/ EMPOWERING COMMUNITIES**

#### **Summary of Issue:**

This report seeks approval of the proposed County Council's response to the consultation on 'Surrey's 2050 Place Ambition', following consultation with a range of Surrey County Council (SCC) services and teams and takes into account views and comments given at the Member Session held on 28 February 2022. A draft response was submitted in time to meet the consultation deadline with the proviso that it was subject to political sign off following the end of the consultation period and further comments may be provided.

With environmental, economic and social implications, the Place Ambition cuts across all the priority areas in the Council's Organisation Strategy.

#### **Recommendations:**

It is recommended that the consultation response attached at Annex 1 is approved.

#### **Reason for Recommendations:**

Surrey's 2050 Place Ambition presents a collective, long-term ambition and priorities for Surrey local authorities to support and manage growth in a way that helps address the challenges associated with climate change, the existing and future infrastructure deficit, whilst enabling Surrey's economy to grow sustainably and improving the overall quality of the environment and well-being of residents. It provides a framework to align spatial plans, programmes, and infrastructure priorities, enable cross-boundary solutions to meet development needs and for partners to work together on delivery to achieve 'good growth'.

Over the next 15 to 20 years, the scale and pattern of spatial growth across Surrey will be determined through borough and district local plans and will largely take place through regeneration and/or redevelopment in towns, urban extensions and a number of new communities. SCC is a vital partner in managing and influencing how that planned growth is delivered.

The consultation response supports the Place Ambition and suggests several revisions to promote delivery on all the priority areas of the Council's Organisation Strategy and its Community Vision.

## **Executive Summary:**

### **Background**

1. Surrey's 2050 Place Ambition has been developed by the Surrey Future partnership, which includes the Surrey districts and boroughs, the County Council, the LEPs, Gatwick Diamond Business and the Surrey Nature Partnership. It is a non-statutory, strategic spatial growth framework that sets out an overarching medium to long term vision and strategic priorities for Surrey as a whole, bringing together spatial aspects of economic, environmental, transport and social issues and highlighting cross-boundary issues where co-operation is needed to support growth. It presents what Surrey's strategic partners want to collectively achieve in terms of 'good growth' and how it is intended to deliver it.
2. Version 1 of the Place Ambition was published in July 2019, following consultation with leaders, relevant portfolio holders and chief executives in all 12 local authorities. It built on earlier work, agreed by Surrey Leaders, on the Surrey Infrastructure Study (2017) and the Interim Local Strategic Statement for Surrey 2016-2031 and on adopted and emerging Local Plans and district and borough economic strategies. This latest consultation is on Version 2. It refreshes Version 1 to reflect updated work on local and county wide strategies and plans and the implications of the pandemic and urgency of the climate crisis and includes a supporting Implementation Framework setting out how it will be delivered.
3. The refreshed Place Ambition was launched at the inaugural conference on 'Good Growth' held jointly with the [Surrey Development Forum](#) in November 2021, which brought together Surrey councils, community groups, developers and consultants. Partners, stakeholders, businesses and local residents were able to view the documents and provide their own comment during a twelve-week consultation period.
4. The intention is for the final version to be agreed and endorsed by all Surrey local authorities and strategic partners making up the Surrey Future partnership who would then commit to working together on delivery.

### **Surrey's 2050 Place Ambition draft version 2**

5. Version 2 of Surrey's 2050 Place Ambition sets out that 'good growth' for Surrey:
  - Is proportionate and sustainable, focusing on the places where people both live and work.
  - Supports overall improvements to the physical and mental health and well-being of our residents.

- Is supported by the necessary infrastructure investment - including green infrastructure.
  - Delivers high quality design in our buildings and public realm.
  - Increases resilience and flexibility in the local economy.
  - Delivers buildings and infrastructure ready for a zero-carbon future and builds resilience to the impacts of climate change and flooding.
  - Is planned and delivered at a local level while recognising that this will inevitably extend at times across administrative boundaries.
6. The definition has been slightly amended from that in the first version to reflect the importance of addressing mental health post-pandemic and the need to deliver buildings and infrastructure ready for a zero-carbon future.
7. As part of the Ambition's identified strategic spatial priorities (SPs), a new long-term priority, SP4, has also been added, such that there are now four SPs in total:
- SP1. Improve connectivity both within Surrey and between strategically important hubs
  - SP2. Enhance the place offer of Surrey's towns
  - SP3. Maximise the potential of our Strategic Opportunity Areas (these cover key areas Local Plans have identified for growth and where strategic and cross border issues need to be addressed including infrastructure investment)
  - SP4. Invest in natural capital and deliver nature recovery.
8. The refreshed version includes an Implementation Framework to integrate the Place Ambition workstreams across Surrey and ensure policy and investment priorities to achieve good growth are aligned. It sets out:
- An integrated system for delivering good growth - it emphasises the need for a systems approach so that spatial considerations are aligned with economic, social, environmental and infrastructure investment priorities. The framework outlines the local and countywide strategies and plans which will influence how planned growth will be delivered on the ground.
  - Strategic Opportunity Area Interventions - a profile of and priority outcomes for each Strategic Opportunity Area and tables setting out the potential strategic interventions that have been identified to deliver these outcomes and require partnership working.
  - A framework for a Surrey urban strategy to support the delivery of Strategic Priority 2 that includes continued support of the Surrey Development Forum to share best practice and improve the quality of development in Surrey, the holding of an annual conference with community groups and the signposting of relevant guidance that SCC is developing, for example the Healthy Streets for Surrey design guide.

## The proposed response

9. The full draft response, included at Annex 1, was submitted on behalf of the Council by the consultation deadline with the proviso that it was subject to political sign off following the end of the consultation period. The highlights and key points from that response are summarised below.
10. Surrey's 2050 Place Ambition provides an important framework for an integrated systems approach to facilitating good growth across Surrey and should be supported by SCC. However, there are a few areas within the Place Ambition that the Council's response highlights could be strengthened.
11. **Community Vision 2030 and SCC Organisation Strategy priorities** - The Place Ambition sets out an agreed shared vision and set of spatial priorities to facilitate a 'good growth' approach to development that will help deliver these. However, the response recommends that the vision should be revised to include the Council's ambition that 'no one is left behind' and Strategic Priority 2 could reference creating thriving communities and for the health and wellbeing needs of an area to be explicitly addressed. In addition, it is noted that the Community Vision is being refreshed to 2050 and the Place Ambition should be kept under review to reflect changes that are made.
12. **Addressing climate change** – Climate change is a cross-cutting issue in the Place Ambition and was frequently mentioned at the November conference by community groups. The Council's response recommends adding a fifth, specific strategic priority on addressing climate change that includes statements on sustainable design and construction, energy, water efficiency and flood risk as well as retaining existing references that relate to the four current strategic priorities.
13. **Place-based delivery** – The refresh of the Place Ambition is an opportunity to join up across the public sector to deliver a whole place approach as advocated in Surrey's Economic Strategy Statement. The Council is already working with partners and local communities to influence how growth is delivered on the ground in a number of towns, and work being undertaken by partners in places like Horley could helpfully be cited as case studies with the emerging 'PLACE' model methodology for improved place-based working included in the urban strategy. In addition, the response considers that the contribution of culture and heritage to successful placemaking should be acknowledged and the need to integrate flood risk management measures into development given greater emphasis.
14. **Design Quality** – The response suggests that the urban strategy should be developed further and expand on how to deliver connected and high-quality development, recognising the importance of SCC investment to delivering active and sustainable travel modes and 20-minute neighbourhoods (all of which are emerging Local Transport Plan 4 priorities) and contributing to quality public realm. The strategy could promote sustainable design for new buildings and explore urban densification strategies for different town typologies and have an important 'signposting' role to relevant, detailed

guidance that is being developed for example on Healthy Streets for Surrey and green and blue infrastructure best practice.

15. **Natural environment** – The Council’s response recommends a number of specific additions and amendments to elevate the importance of climate resilience and specifically flood risk management within the document. The refresh should refer to the biodiversity elements of the Environment Act 2021 including the strengthened biodiversity duty, biodiversity net gain and the need to produce a Local Nature Recovery Strategy for Surrey.
16. **Monitoring** – The response recommends that monitoring of the Place Ambition’s delivery needs to include tracking of the strategic interventions/projects for each Strategic Opportunity Area and a dashboard approach is suggested. Air quality and access to green spaces are additional indicators that might be considered.
17. **Key diagram** – The response specifically suggests that the Strategic Opportunity Areas and Surrey Hills AONB overlapping on the Ambition’s Key Diagram needs further consideration to clarify the AONB is a protected area as defined in national policy and not a growth area.

#### **Future governance for place partnership working in Surrey**

18. A review of future governance around the countywide place agenda has been commissioned with an intention to complete by end of April. The aim is to streamline governance around economy, growth, infrastructure, planning and housing, and to ultimately enable countywide working on place to become more effective.

#### **Consultation:**

19. Internal consultation has been carried out with relevant SCC services and teams.
20. A Member Development Session was held on 28 February and additional comments arising from that session have been incorporated into the response.

#### **Risk Management and Implications:**

21. The key risk is that the Place Ambition is not afforded the priority or resource it needs to be delivered. This can be mitigated through partners engaging with the current consultation and agreeing and endorsing the document, and through the review of governance around this programme of work, which will help to ensure the identified priorities are effectively delivered.

#### **Financial and Value for Money Implications:**

22. Improved co-ordination and partnership working at a strategic level around the place agenda will support delivery of the Community Vision 2030, the Council's priority objectives, and help deliver the best long-term outcomes for residents.
23. No direct financial implications are known at this stage; however, in the longer term there are potential future savings to be achieved through effective partnership working to deliver on the priorities.

#### **Section 151 Officer Commentary:**

24. Although significant progress has been made to improve the Council's financial position, the medium-term financial outlook beyond 2022/23 remains uncertain. With no clarity on central government funding in the medium term, our working assumption is that financial resources will continue to be constrained, as they have been for the majority of the past decade. This places an onus on the Council to continue to consider issues of financial sustainability as a priority in order to ensure stable provision of services in the medium term.
25. As such, the Section 151 Officer concurs with the consultation response to Surrey's 2050 Place Ambition.

#### **Legal Implications – Monitoring Officer:**

26. The Place Ambition has been developed by the Surrey Future partnership which includes Surrey County Council, Surrey District and Borough Councils and a number of other agencies. Its purpose is to promote a long lasting and co-ordinated approach to growth and planning. This does not raise any legal implications over and above any advice provided to Cabinet in relation to the Community Vision 2030. Any future partnership projects may be the subject of future specific cabinet reports.

#### **Equalities and Diversity:**

27. The refresh of the Place Ambition does not signal a change in policy and so an equalities impact assessment has not been produced for this consultation response. However, a key principle set out in the Place Ambition is the need to work with local communities, making sure that there is wide ranging choice in housing, services, and jobs across Surrey and that places are distinctive, attractive, well designed, full of character and are of the highest quality. Underlying all of this is the ambition to improve the overall quality of health and well-being across Surrey, recognising that healthy places and people are a key factor for long-term prosperity.

#### **Other Implications:**

28. The potential implications for the following council priorities and policy areas have been considered. Where the impact is potentially significant a summary of the issues is set out in detail below.

<b>Area assessed:</b>	<b>Direct Implications:</b>
Corporate Parenting/Looked After Children	No direct implications identified
Safeguarding responsibilities for vulnerable children and adults	No direct implications identified
Environmental sustainability	The consultation response includes comments to strengthen the Place Ambition's address of environmental and sustainability issues.
Compliance against net-zero emissions target and future climate compatibility/resilience	The consultation response includes a suggestion to strengthen the Place Ambition's compliance with net-zero emissions target and assessment of the future climate compatibility/resilience of the consultation material.
Public Health	The consultation response includes comments to strengthen the health aspects of the refreshed Place Ambition.

**What Happens Next:**

29. Next steps are as follows:

- If approved, notice will be sent to the Surrey Future partnership that the draft consultation response has political sign-off and additional comments will be submitted if required.
- Surrey Future's Place Ambition Task Group will review all responses to the consultation and recommend changes to be agreed by the Surrey Future Steering Board.
- The intention is for the final refreshed Place Ambition to be agreed and endorsed by all Surrey local authorities and strategic partners making up the Surrey Future partnership who would then commit to working together on delivery.
- The Place Ambition will be used to engage with stakeholders who have a key role to play in its delivery, including government departments and agencies and developers to access potential funding and investment. It will also be used to engage with neighbouring authorities on cross border strategic planning issues, including the next review of the London Plan.
- Going forward, governance of the Place Ambition programme is being reviewed and will be closely tied to the Surrey Forum and partnership boards.

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**Consulted:**

Tim Oliver, Leader of the Council

Matt Furniss, Cabinet Member for Transport and Infrastructure

Marisa Heath, Cabinet Member for Environment

Relevant county council services affected including Economy and Growth, Highways and Transport, Environment, Infrastructure, Planning and Major Projects, Land and Property, Public Health, Communities and Corporate Strategy and Policy.

**Annexes:**

Annex 1 – Surrey County Council response to Surrey’s 2050 Place Ambition consultation

**Sources/background papers:**

- Surrey Place Ambition Version 2 – Draft for Consultation and Surrey Place Ambition Implementation Framework – Draft for Consultation.  
[PlaceAmbition - Surrey County Council - Citizen Space \(surreysays.co.uk\)](http://surreysays.co.uk)
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1 March 2022

Dear Sir/Madam

### **Surrey's 2050 Place Ambition – Comments from Surrey County Council**

Surrey County Council (SCC) welcomes the opportunity to comment on Surrey Future Partnership's Surrey 2050 Place Ambition. This is a draft response which is being submitted in time to meet the consultation deadline with the proviso that it is subject to formal sign off by the Council's Cabinet following the end of the consultation period and further comments may be provided.

Over the next 15 to 20 years, the scale and pattern of spatial growth across Surrey will be determined through borough and district local plans and will largely take place through regeneration and redevelopment in towns, urban extensions and a number of new communities. We recognise that the county council has an important role and is a vital partner in managing and influencing how that planned growth is delivered. Surrey's 2050 Place Ambition provides an important framework for an integrated systems approach to facilitating good growth across Surrey and, as such, we support it.

Our responses to the consultation questions are set out in the Annex attached to this letter. In particular, the Council would wish to emphasise the following points:

1. The Place Ambition sets out an agreed shared vision and set of spatial priorities to facilitate a 'good growth' approach to development that will help deliver these. However, the Council would strongly encourage the Partnership to revise the vision to include our ambition that 'no one is left behind.' In addition, the Council also believes that Strategic Priority 2 could reference the importance of creating

thriving communities. Further, it is noted that the Community Vision is being refreshed to 2050 and therefore it is recommended that the Place Ambition be kept under review to reflect changes that are made.

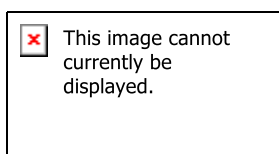
2. The Council, along with other partners across the county, are committed to the county achieving net zero carbon emissions by 2050, and Surrey's Climate Change Strategy and Delivery Plan set out our collective approach to do our part to tackle climate change. It is also worth noting that tackling climate change was seen as one of the main challenges confronting Surrey by various delegates at the November conference. Therefore, while it is noted that climate change is a cross-cutting issue in the Place Ambition which is addressed through Strategic Priorities 1 to 4, the Council recommends that a new strategic priority on addressing climate change is also included (see Section 3 in the Annex). The potential implications if the county does not deliver on our climate change ambitions are increased risk of flooding and extreme heat, disruption to our critical infrastructure, networks and industry, and increased risk to our health and wellbeing. The new strategic priority should include statements on sustainable design and construction, energy, water efficiency and flood risk.
3. The Surrey Health and Well-being Board is steering community-led action across the county to reduce health inequalities. Priority three of the Health and Well-being Strategy states its aim as 'supporting people to reach their potential by addressing the wider determinants of health'. The outcomes for this priority include that the benefits of healthy environments are recognised and valued (including through transport/land use planning). The way in which new developments are planned for and designed has an influence not only on communities' health and wellbeing, but on the choices residents make and their sense of safety, community and identity, and to that end, the Council welcomes that Strategic Priority 2 of the Place Ambition promotes healthy, inclusive, and safe places which contribute positively to people's wellbeing. However, the Covid pandemic has intensified the demand for and pressures on health services, and the Council considers that Strategic Priority 2 could be enhanced by including an aim which requires the health and wellbeing needs of an area to be explicitly addressed in place initiatives (see Section 4 in the Annex).
4. The refresh of the Place Ambition is an opportunity to join up across the public sector to deliver a whole place approach as advocated in Surrey's Economic Strategy Statement. The council is already working with partners and local communities to influence how growth is delivered on the ground in a number of towns and current engagement and work currently underway by partners in Horley could helpfully be cited as a case study and the 'PLACE' model (see Section 4 in the Annex) should be included in the urban strategy. Further, the contribution of culture and heritage to successful placemaking should be acknowledged and the need to integrate flood risk management measures into development given greater emphasis.
5. The urban strategy should be developed further and expand on how to deliver connected and high-quality development, recognising the key role of SCC in delivering active and sustainable travel modes and 20 minute neighbourhoods (which are emerging Local Transport Plan 4 priorities) and contributing to quality public realm (see Section 4 in the Annex). The strategy could promote sustainable design for new buildings and explore urban densification strategies for different town typologies and have an important 'signposting' role to relevant,

detailed guidance that is being developed for example on Healthy Streets and a green and blue infrastructure guide. There is scope to expand on how the Place Ambition will raise design aspirations, celebrate architectural features and places through designing walkable, connected and high quality development. In implementing the Place Ambition our investment needs to focus on delivering active and sustainable travel modes and enhancing quality public realm.

6. The Council recommends a number of specific additions and amendments to elevate the importance of climate resilience and specifically flood risk management within the document (see Sections 3,5 and 6 in the Annex). Implementation could make greater reference to integrated adaptive planning for climate change impacts. Investment in SOAs and town centres has a major overlap with flood risk management investment and resilience work, which also aligns well with Biodiversity Net Gain requirements. The refresh should refer to the biodiversity elements of the Environment Act 2021 including the strengthened biodiversity duty, biodiversity net gain and the need to produce Local Nature Recovery Strategies.
7. The Place Ambition needs to place more emphasis on the Surrey Hills AONB as an important strategic asset to Surrey, regionally and nationally, in terms of landscape, environment, provision of green infrastructure and contribution to the visitor economy. On the key diagram, how the SOAs and Surrey Hills AONB overlap needs further consideration to clarify the AONB is not a growth area (see Section 7 in the Annex).
8. Monitoring needs to include tracking of the strategic interventions/projects for each SOA and could consider including subjective indicators that reflect how residents feel about the places they live in as well as more traditional objective indicators.

The Government's recent Levelling-Up White Paper means there is an even greater need for partners in Surrey to collaborate on funding and securing funding from Government and its agencies and the private sector to deliver projects and interventions to ensure 'good growth' is achieved. To that end, the Council welcomes the ongoing partnership work to finalise and implement the Place Ambition.

Yours sincerely



Matt Furniss, Cabinet Member for Transport and Infrastructure

## **Surrey County Council’s response to Surrey’s 2050 Place Ambition – March 2022**

### **1. Our Vision, Principles and Values**

We suggest that an aim is added to paragraph 3.2 to elevate the importance of climate resilience and specifically flood risk management within the document:

- “Ensuring communities, business and infrastructure are resilient to the impacts of severe weather events including flooding; both now and in the future considering the impacts of climate change”.

### **2. Context and Facts and Figures**

The facts and figures section is useful in providing context and we would suggest including the following:

- Text on Surrey’s environment showing the national importance of the Surrey Hills AONB. AONBs are part of the global network of protected landscapes. The Surrey Hills AONB offers some of South East England’s most stunning and accessible countryside which attracts millions of visitors every year who make an important contribution to the economy of Surrey. Text should also be added to paragraph 2.5.
- Text on page 10 referring to specific flooding from the River Wey and River Mole.
- Text from LTP4 to highlight some of the challenges faced in relation to behaviour change. For example, the average car journey in Surrey is under 2 miles.

### **3. Add a new Strategic Priority on Addressing Climate Change**

Climate change is the most significant threat facing humankind today. While climate change considerations run through the Place Ambition, we would recommend that a new strategic priority is included specifically on addressing climate change. This should include statements on:

- Sustainable design and construction – the requirements which should be applied to residential and non-residential development.
- Energy – the aim to minimise energy demand and maximise energy efficiency and the use of renewable energy.
- Water efficiency – the aim to achieve water efficiency standards for all new developments.
- Flood risk – given the significance of flood risk in the county, a statement should be included on lifting properties out of high flood risk categories and this should be included as an outcome in relevant SOAs.

We strongly believe water management should be included within the system for achieving sustainable growth. Surrey currently experiences periods of severe flooding and also water resource scarcity. These issues can only be significantly addressed in the long term through development and land management approaches. There is no mention of the increase in water consumption and foul water treatment associated with new development, so links should be made to water company approaches and strategies too.

Implementation should ensure that opportunities are taken to make the county more resilient to the impacts of climate change: how well considered this is in the developments we create now and in the future, will determine the resilience, liveability and running costs for future

generations. We would welcome greater reference to integrated adaptive planning for climate change impacts within the Place Ambition.

#### **4. Strategic Priority 2: Enhance the place offer of Surrey's towns**

Health Equality - Spatial planning plays an important role in influencing our physical and mental health. The Place Ambition provides an opportunity to ensure that policies are taken forward that encourage the creation of sustainable, well-designed communities that are safe, socially cohesive and promote active and healthier lifestyles. Strategic Priority 2 could be enhanced by including an aim which requires the health and wellbeing needs of an area to be explicitly addressed and new development to consider how existing community assets could be enhanced to help promote healthy life expectancy.

Existing Urban Areas – Although the Place Ambition is focused on growth and new development, in order to support sustainable urban densification to accommodate new homes and businesses, changes to existing urban areas will be needed through measures such as introducing cycle lanes, pocket parks etc. These aspects need to be explored through the urban strategy.

Place-based delivery – In the medium to long term the pattern of spatial growth across Surrey is set through local plans and will largely take place through regeneration/redevelopment in towns, urban extensions and a number of new communities. The Place Ambition focuses on priorities for growth and infrastructure investment in these areas (identified in the Implementation Framework, SOA interventions and urban strategy). The council is already working with partners and local communities to influence how growth is delivered on the ground in a number of towns and we welcome the references to Farnham, Horley, Staines and Weybridge in Strategic Priority 2. Caterham could also be referenced in the document and current engagement and work in Horley could helpfully be cited as a case study with the 'PLACE' model included in the urban strategy.



The newly formed SCC Placemaking Group has been established to promote collaborative approaches to deliver priorities.

Liveable Neighbourhoods - explicit reference should be made to 'liveable neighbourhoods' as this is an area of focus for SCC. Liveable neighbourhood projects help deliver attractive, healthy, accessible and safe neighbourhoods for communities. Typically, this may involve changes to town centres and their surrounding residential areas to improve conditions for walking and cycling and reduce traffic dominance. To inform the development of projects we are broadening our approach to community engagement in order to hear from a cross section of residents within communities. These types of projects would appear to be particularly relevant to the neighbourhood proportion of CIL funding. Through the implementation of the Place Ambition we would welcome work to explore possible approaches for considering local CIL as one of a number of potential funding sources for projects in line with community aspirations.

Cultural aspects - The Place Ambition effectively brings together most of the aspects of placemaking (including transport, schools, sustainability and economy) that create thriving places that enrich local identity and celebrate uniqueness, maximising economic revitalisation whilst ensuring a sustainable future. It would also be useful to reference the need for cultural aspects that make each area unique such as history, art, libraries, community and event space as these are often left as last minute and token gestures.

Historic environment - There is clear evidence that living and working in well-established historic areas is a key contributor both to economic success and individual health and wellbeing and retention and enhancement of places where existing assets have already created an attractive locale supports this. Strategic Priority 2 references re-use of heritage assets in town centres and this is to be welcomed, but there are heritage assets elsewhere to consider, and of course other assets than buildings such as landscapes, parkland and views (and archaeology) which can all contribute to providing well-designed new development and more attractive places. At the moment, there are national tax incentives against re-using existing buildings which is both wasteful and ignores the environmental benefits of re-use.

A specific revision to paragraph 4.17 has been requested - Improve flood resilience in our communities, working with key bodies such as the Environment Agency to ~~open up new opportunities for development to~~ reduce flood risk overall and use new opportunities for development to reduce existing flood risk.

## **5. Maximise the potential of our Strategic Opportunity Areas**

In taking the Place Ambition forward there will be a need to engage with partners to secure funding for projects identified in the SOAs. This could be through pooling funding, joint lobbying to Government and national agencies for funding and making the case for private investment.

Investment in SOAs and town centres has a major overlap with flood risk management investment and resilience work. A number of additions should be made to further reflect the importance of flood risk management measures across the SOAs:

- Paragraph 4.21 of the Spatial Framework – add an additional bullet “ Integrate flood risk management measures to improve the resilience of communities within the SOAs”.
- SOA 2 Woking Hub - Woking is subject to significant flood risk and this should be included here, specifically in 'key challenges'. Priority outcomes should include 'reduction in flood risk from all sources'.
- SOA 3 Guildford Hub – a rewording of the key challenge is required “Need for flood alleviation of the River Wey and combined surface water catchment through Guildford town centre to maximise regeneration opportunities and provide resilience.”

Guildford town centre is subject to significant surface water flood risk and there is a need for sustainable drainage considerations. We suggest the inclusion of a priority outcome “reduction in flood risk from all sources”.

There is a need for further clarity on a number of the SOAs:

- SOA8 M25 J6/A22 South Godstone – the priority outcome should emphasise the need for solutions to also improve capacity for active and sustainable travel modes in relation to the road network around the SOA.

## **6. Strategic Priority 4: Invest in natural capital and deliver nature recovery**

The Environment Bill was given Royal Assent in November 2021 and became the Environment Act 2021. This strategic priority should refer to the biodiversity elements in the Act including the strengthened biodiversity duty, biodiversity net gain to ensure developments deliver at least 10% increase in biodiversity and the need to produce Local Nature Recovery Strategies to support a Nature Recovery Network. The document also needs to reflect the DEFRA Biodiversity Net Gain consultation published on 11 January 2022.

The distinctive character of Surrey draws heavily from its ‘green’ spaces; the North Downs, Green Belt, our high percentage of tree cover etc but these are all part of what makes Surrey, rather than existing as separate places. In this sense, integration with the natural environment could be further addressed within the Place Ambition. For example there could be more emphasis on and details around methods for integrating green space into development.

There is limited mention of blue and green infrastructure. We would welcome the inclusion of Sustainable Drainage Systems (SuDS) in all new development (not just major applications) and encouragement of retrofitting to reduce existing risk. SuDS should be multifunctional spaces reducing flooding, improving water quality and improving and integrating biodiversity and amenity into developed spaces. This links well with biodiversity net gain requirements and the ambition of ‘Maximising opportunities to enhance the health and wellbeing of Surrey’s residents...’. Similarly, the use of natural flood management across Surrey on a catchment based approach will reduce the number of existing properties at flood risk and reduce water resource impacts; again this links well with Environmental Land Management Scheme subsidies proposed by central government.

This strategic priority could be taken forward by further work on offsetting and whether there is the potential to develop a common approach across Surrey.

We suggest that a bullet is added to paragraph 4.25 to elevate the importance of climate resilience and specifically flood risk management within the document:

- “Utilising a catchment based approach to natural flood management and other water and land management techniques to reduce the impact of severe weather events including flooding, heatwaves and droughts”.

## **7. Key Diagram**

We note that the geographical extent of the SOAs on the key diagram is for illustrative purposes only and hence they have been drawn with fuzzy boundaries. However, there is a need to consider how they overlap with the Surrey Hills AONB. The AONB is not an appropriate place to invest in strategic infrastructure to support long term prosperity as set

out in paragraph 4.18. There is a need to consider amendments to the boundaries of SOA3-SOA8 and possibly to use broken SOA shading where the SOA overlaps with the AONB.

## **8. Integrated System for Delivering Good Growth**

The document recognises that the Place Ambition has been shaped by and will be implemented through a number of strategies. These lists should include reference to the following documents:

- The Surrey Minerals and Waste Plans – paragraph 2.7 should refer to the Surrey Waste Local Plan 2019 and the Surrey Minerals Plan Core Strategy 2011 as existing plans that form part of the Development Plan and guide development within the county. A summary of these documents should be included in the list of Countywide Strategies and Plans in section 2 of the Implementation Framework.
- The Surrey Hills Management Plan 2020-2025 – paragraph 2.7 should refer to the Surrey Hills Management Plan as a statutory document that guides development within the county. A summary of the document should be included in the list of Countywide Strategies and Plans in section 2 of the Implementation Framework.
- The Surrey Flood Risk Management Strategy is currently being updated. It should be included in the list of Countywide Strategies and Plans in section 2 of the Implementation Framework and in the diagram on page 6. Reference could also be made within this section to water company Drainage and Waste Water Management Plans and Water Resource Management Plans.

## **9. Strategic Opportunity Area Interventions**

Surrey County Council role influencing delivery of growth - To deliver on a number of the priorities included in the document strong policy positions are required. This will be an area for greater collaborative working and the county council can provide advice and policy support to assist local plan development and delivery particularly in areas such as transport and planning for climate change and flooding.

## **10. Developing the Surrey Urban Strategy**

We support the delivery of the priorities in the Surrey Urban Strategy as a mechanism for taking Strategic Priority 2 forward. This could be done through the following actions:

- Continue to hold an annual conference that brings together local authorities, developers and representatives from Surrey local communities.
- Exploring further options for engaging with communities and improving links with schools to ensure we meet the needs of younger people. Possibilities, such as 3D modelling and 'Augmented Reality' should be considered.
- Showcasing best practice in Surrey – promote examples of local authority delivery of developments on public sector land to show housing mix, green credentials, affordable housing and urban realm.
- Promoting the Surrey Green and Blue Infrastructure Guide which presents best practice examples of GBI projects that have already been delivered in the county.
- Sharing knowledge and learning from strategic developments e.g. lessons learnt from Longcross as a garden village that can be applied to other areas.
- Promoting the Healthy Streets design guide and producing new guidance documents on design quality
- Setting up design review panels to help to ensure new schemes can meet the priorities identified.



- Building on the relationship with developers and infrastructure providers through the Surrey Development Forum to share best practice and jointly lobby for strategic infrastructure investment.

### **11. Monitoring**

Monitoring needs to focus on how residents feel rather than just Government led statistics, for example percentage of people satisfied with their local area as a place to live. Indicators on air pollution, access to green spaces and cultural aspects of placemaking could all be explored.

We would also like to see the tracking of the strategic interventions/projects for each SOA and a dashboard type approach is suggested.

### **12. General**

Consideration should be given as to whether a Strategic Environmental Assessment should be undertaken for the Place Ambition.

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