

24 November 2025



Thomas Hatfield
Inspector
Planning Inspectorate

Charles Collins MSc, MRTPI

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Guildford
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Dear Sir,

Examination of the Surrey Heath Local Plan - Letter in Advance of the 8th December Hearing Session

I write on behalf of Vistry Plc and ADP Fairoaks Ltd ('the Parties') to respond to your letter of 28th October 2025 titled 'ID6 - Inspector Letter re Consultation and Further Hearing'.

The Parties have appended to this letter the following notes;

- A note titled 'Wastewater Infrastructure Review for the Surrey Heath Local Plan' produced by SLR Consulting Limited.

The HBF will be submitting a note that responds to 'SHBC27: Council's note on alternative 5 year supply scenarios' that is supported by Vistry Plc and ADP Fairoaks.

HBF Note

The joint HBF note produced with Savills and ADP Fairoaks Ltd raises a number of points relevant to our Hearing Statements for Matters 1, 2, 3 and 7 in particular. The note but reiterates and updates previous points due to 5YHLS figures put forward by the Council in SHBC27. The letter addresses the Parties' concerns that:

- The alternative scenarios prepared by SHBC do not correctly take into account the backlog of housing between 2023 and 2026 based on the Council's land supply estimates;
- The certainty over delivery of a large proportion of housing sites within Camberley;
- The land supply shortages from 2029 and so soon after the Local Plan is due to be adopted;
- Insufficient flexibility in supply to ensure local plan deliverability;
- Local Government Reorganisation and the likelihood of further delays for the next local plan and;
- the necessity for a review clause for the emerging Local Plan (for which draft policy wording is suggested).

The note also includes several alternative scenarios all with a base date that commence in 2023/24 but include and exclude further scenarios that the Parties consider to be important (e.g. Hart DC delivery, buffers to supply, withdrawal of key Camberley sites from the first five years post adoption).

Wastewater Infrastructure Review Note

The Wastewater Infrastructure Review note sets out the Environment Agency's concerns relating to capacity issues at Lightwater STW and Camberley STW which serve the planned housing growth for the emerging Local Plan. Furthermore, planned upgrades to these STW's are some years away, with increased housing growth in the meantime increasing the risk of environmental deterioration under WFD regulations. The Parties judge the situation to be accepted by both SHBC and Thames Water – though it does not appear to have been realistically outlined in the emerging housing trajectory.

The note states that Fairoaks would be served by Chertsey STW, where there is spare capacity and reduced risk of pollution of waterbodies, however the emerging Local Plan only assesses developments that would

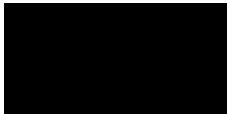


connect into the three treatment works experiencing capacity issues. This is a significant oversight from SHBC and an updated Water Cycle Study, with input from both the EA and Thames Water, should be produced.

As is outlined in our Regulation 19 representations, and relevant hearing statements – SHBC are strongly encouraged to find a sound spatial strategy that enables a deliverable five-year housing land supply and includes greater plan contingency/ flexibility – i.e. through a buffer on the housing requirement or supply.

We shall attend the further Hearing session scheduled for 8th December to elaborate on these points as required.

Yours sincerely,



Charles Collins MSc MRTPI
Director - Head of Office

Dear Inspector

SURREY HEATH LOCAL PLAN – COMMENTS ON SHBC 27

1. Thank you for the opportunity to comment on the additional evidence and commentary provided by the Surrey Heath Borough Council (SHBC) with regard to the additional evidence on the five year housing land supply in SHBC 27. HBF, Vistry Plc and ADP Fairoaks Ltd (the Parties) are concerned that the scenarios provided by the Council are not accurate and do not correctly take into account the backlog of housing between 2023 and 2026 based on the Council's land supply estimates in Appendix 7 of the updates to the Strategic Land Availability Assessment (SHBC18G). In order to illustrate our concern a rolling trajectory has been provided in an appendix to this letter with the position for each of the scenarios summaries in the table below¹.

Table 1: Five year land supply for 2026/27 to 2030/31 based on Council's trajectory in SHBC18G.

	5% buffer	20% buffer
Local Plan assumptions	7.68	6.72
Plan base dated to 2023	7.26	6.35
Plan base dated to 2023 and no contribution from Hart.	5.94	5.20

2. While these are relatively small adjustments, they are significant should key sites not come forward as expected. As was noted at the hearings there was considerable doubt that key sites in Camberley would come forward within five years. This included the sites comprising the London Road Block (HA2), Land East of Knoll Road (HA3) and Camberley Station (HA1/03) amongst others. As can be seen in the table below, the land supply on adoption falls below five years once the 20% buffer is applied from July 2026 as required by NPPF24 if these marginal sites do not come forward as suggested by the Council. This position will worsen still should other sites discussed at the hearing not come forward. As the inspector will be aware Savills, on behalf of Vistry Plc, queried the inclusion of a 1,346 homes within the five year land supply as well as the level of windfall that can be expected to come forward.

¹ All 5YHLS assessments based on the Sedgfield approach.

Table 2: Five year land supply using amended trajectory moving HA2, HA3 and HA1/03 out of five year supply.

	5% buffer	20% buffer
Local Plan assumptions	7.68	6.72
Plan base dated to 2023	6.32	5.53
Plan base dated to 2023 and no contribution from Hart.	5.18	4.53

3. What is also notable from the rolling trajectories in appendix A is that even on the Council's supply estimates and including supply from Hart to 2031 they will not have a five year land supply from 2029, only three years after the local plan is adopted. There is clearly the need to boost land supply in the short term to address these shortcomings – even more so given the immediate strategic planning context and the fact that under the transitional arrangements SHBC are planning considerably below the up to date Standard Method (as set out in the Parties statements for matters 1, 2 and 3). The Parties recognise that the housing minister has written to the Chief Executive of the Planning Inspectorate outlining his support for Inspectors being flexible and pragmatic when considering such matters in order to expedite the adoption of local plans where these significantly boost land supply. However, this plan does not boost land supply in the short term, nor does it meet housing needs fully over a plan period that is consistent with national policy. As can be seen from the trajectories in the appendices there is a shortfall over the extended plan period of either 563 homes or 932 homes depending on whether delivery from Hart is included in supply – a shortfall that could be addressed now through additional allocations.
4. Should the plan be brought forward commencing from the year in which the housing needs were assessed (2023/24) but not extended there remains a smaller shortfall of 5 or 95 homes, again depending on whether delivery from Hart is included in supply. However, if the plan period only extends for 12 years post adoption there should be greater emphasis on the flexibility in supply to ensure the plan is deliverable over the plan period. While there is no specific guidance as to how many additional homes are required deliver the necessary flexibility many local plans seek to include a buffer of between 10% and 20% to ensure that needs can be met in full. This would require the Council to find sufficient sites to deliver between 481 and 962 additional new homes over the plan period to what is currently being planned for to 2037/38.
5. This is of particular importance for SHBC as there is a strong possibility that there will not be a new local plan for the area for a number of years due to local government reorganisation, which will see SHBC become part of a new unitary authority for West Surrey from May 2027. Experience from similar reorganisation elsewhere is that plan making is slow. Buckinghamshire Council, for example, do not expect to adopt a local plan until December 2027 at the earliest – nearly 8 years after the authority was founded. As such, there is a significant risk that this plan will be in place for a number of years and as such it is essential that it seeks to ensure that there is sufficient flexibility in supply to ensure as a minimum the needs identified in this plan are met in full.

6. If the inspector is not minded to require additional allocations, then it is essential that a review clause is included in the local plan that requires a new plan to be submitted by a specific date and that if it is not submitted then the policies relating to housing need are considered out of date for the purposes of decision making. This is necessary for soundness and would ensure the plan is effective and consistent with the transitional arrangements set out in paragraph 236 of NPPF24. The following policy is suggested:

Policy x - Reviewing the Local Plan

The Council will undertake a review of the Local Plan, which will commence immediately. The updated replacement plan will be submitted for examination no later than two and a half years after the date of adoption of this plan. In the event that this submission date is not adhered to, the policies in the Local Plan which are most important for determining planning applications for new dwellings will be deemed to be 'out of date' in accordance with paragraph 11 d) of the National Planning Policy Framework 2024.

Yours sincerely,

Mark Behrendt
Regional Planning Manager

Charles Collins
Director – Savills on behalf of Vistry Plc

Mike Evans
Consultant - on behalf of ADP Fair Oaks Ltd

Appendix: A Rolling trajectory Council's assumptions Delivery from Hart included.

Base date 2023/24, end date 2040/41 – 5% buffer in 2026/27

	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	40/41
Requirement	280	280	280	280	280	280	280	280	280	321	321	321	321	321	321	321	321	321
Cumulative	280	560	840	1,120	1,400	1,680	1,960	2,240	2,520	2,841	3,162	3,483	3,804	4,125	4,446	4,767	5,088	5,409
Delivery	322	221	216	508	557	378	448	366	305	240	232	242	276	271	138	42	42	42
Cumulative	322	543	759	1,267	1,824	2,202	2,650	3,016	3,321	3,561	3,793	4,035	4,311	4,582	4,720	4,762	4,804	4,846
Surplus/deficit	-	-17	-81	-	-	-	-	-	-	-	-	-	-	-	-	-5	-284	-563
Five year requirement	1,400	1,400	1,400	1,400	1,400	1,441	1,482	1,523	1,564	1,605	1,605	1,605	1,605	1,605				
add deficit/surplus	1,400	1,400	1,417	1,481	1,400	1,441	1,482	1,523	1,564	1,605	1,605	1,605	1,605	1,605				
5% Buffer	70	70	71	74	280	288	296	305	313	321	321	321	321	321				
Total req	1,470	1,470	1,488	1,555	1,680	1,729	1,778	1,828	1,877	1,926	1,926	1,926	1,926	1,926				
Five year supply	1,824	1,880	2,107	2,257	2,054	1,737	1,591	1,385	1,295	1,261	1,159	969	769	535				
Surplus/deficit	354	410	619	702	374	8	-187	-443	-582	-665	-767	-957	-1,157	-1,391				
5YHLS	6.20	6.39	7.08	7.26	6.11	5.02	4.47	3.79	3.45	3.27	3.01	2.52	2.00	1.39				

Base date 2023/24, end date 2040/41 – 20% buffer from 2026/27

	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	40/41
Requirement	280	280	280	280	280	280	280	280	280	321	321	321	321	321	321	321	321	321
Cumulative	280	560	840	1,120	1,400	1,680	1,960	2,240	2,520	2,841	3,162	3,483	3,804	4,125	4,446	4,767	5,088	5,409
Delivery	322	221	216	508	557	378	448	366	305	240	232	242	276	271	138	42	42	42
Cumulative	322	543	759	1,267	1,824	2,202	2,650	3,016	3,321	3,561	3,793	4,035	4,311	4,582	4,720	4,762	4,804	4,846
Surplus/deficit	-	-17	-81	-	-	-	-	-	-	-	-	-	-	-	-	-5	-284	-563
Five year requirement	1,400	1,400	1,400	1,400	1,400	1,441	1,482	1,523	1,564	1,605	1,605	1,605	1,605	1,605				
add deficit/surplus	1,400	1,400	1,417	1,481	1,400	1,441	1,482	1,523	1,564	1,605	1,605	1,605	1,605	1,605				
20% Buffer	70	70	71	296	280	288	296	305	313	321	321	321	321	321				
Total req	1,470	1,470	1,488	1,777	1,680	1,729	1,778	1,828	1,877	1,926	1,926	1,926	1,926	1,926				
Five year supply	1,824	1,880	2,107	2,257	2,054	1,737	1,591	1,385	1,295	1,261	1,159	969	769	535				
Surplus/deficit	354	410	619	480	374	8	-187	-443	-582	-665	-767	-957	-1,157	-1,391				
5YHLS	6.20	6.39	7.08	6.35	6.11	5.02	4.47	3.79	3.45	3.27	3.01	2.52	2.00	1.39				

Appendix B – Rolling trajectory Council's assumptions. Delivery from not Hart Included

Base date 2023/24, end date 2040/41 – 5% buffer in 2026/27

	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	40/41
Requirement	321	321	321	321	321	321	321	321	321	321	321	321	321	321	321	321	321	321
Cumulative	321	642	963	1,284	1,605	1,926	2,247	2,568	2,889	3,210	3,531	3,852	4,173	4,494	4,815	5,136	5,457	5,778
Delivery	322	221	216	508	557	378	448	366	305	240	232	242	276	271	138	42	42	42
Cumulative	322	543	759	1,267	1,824	2,202	2,650	3,016	3,321	3,561	3,793	4,035	4,311	4,582	4,720	4,762	4,804	4,846
Surplus/deficit	-	-99	-204	-17	-	-	-	-	-	-	-	-	-	-	- 95	-374	-653	-932
Five year requirement	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605				
add deficit/surplus	1,605	1,605	1,704	1,809	1,622	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605				
5% Buffer	80	80	85	90	324	321	321	321	321	321	321	321	321	321				
Total req	1,685	1,685	1,789	1,899	1,946	1,926	1,926	1,926	1,926	1,926	1,926	1,926	1,926	1,926				
Five year supply	1,824	1,880	2,107	2,257	2,054	1,737	1,591	1,385	1,295	1,261	1,159	969	769	535				
Surplus/deficit	139	195	318	358	108	-189	-335	-541	-631	-665	-767	-957	-1,157	-1,391				
5YHLS	5.41	5.58	5.89	5.94	5.28	4.51	4.13	3.60	3.36	3.27	3.01	2.52	2.00	1.39				

Base date 2023/24, end date 2040/41 –20% buffer from 2026/27

	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	40/41
Requirement	321	321	321	321	321	321	321	321	321	321	321	321	321	321	321	321	321	321
Cumulative	321	642	963	1,284	1,605	1,926	2,247	2,568	2,889	3,210	3,531	3,852	4,173	4,494	4,815	5,136	5,457	5,778
Delivery	322	221	216	508	557	378	448	366	305	240	232	242	276	271	138	42	42	42
Cumulative	322	543	759	1,267	1,824	2,202	2,650	3,016	3,321	3,561	3,793	4,035	4,311	4,582	4,720	4,762	4,804	4,846
Surplus/deficit	-	-99	-204	-17	-	-	-	-	-	-	-	-	-	-	-95	-374	-653	-932
Five year requirement	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605				
add deficit/surplus	1,605	1,605	1,704	1,809	1,622	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605				
20% Buffer	80	80	85	362	324	321	321	321	321	321	321	321	321	321				
Total req	1,685	1,685	1,789	2,171	1,946	1,926	1,926	1,926	1,926	1,926	1,926	1,926	1,926	1,926				
Five year supply	1,824	1,880	2,107	2,257	2,054	1,737	1,591	1,385	1,295	1,261	1,159	969	769	535				
Surplus/deficit	139	195	318	86	108	-189	-335	-541	-631	-665	-767	-957	-1,157	-1,391				
5YHLS	5.41	5.58	5.89	5.20	5.28	4.51	4.13	3.60	3.36	3.27	3.01	2.52	2.00	1.39				

Appendix C: Rolling Trajectory adjusted to remove delivery from HA2, HA3 and HA1/03 from the first five year post adoption. Delivery from Hart included.

Base date 2023/24, end date 2040/41 – 5% buffer in 2026/27

	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	40/41
Requirement	280	280	280	280	280	280	280	280	280	321	321	321	321	321	321	321	321	321
Cumulative	280	560	840	1,120	1,400	1,680	1,960	2,240	2,520	2,841	3,162	3,483	3,804	4,125	4,446	4,767	5,088	5,409
Delivery	322	221	216	508	557	378	308	216	385	390	292	242	276	271	138	42	42	42
Cumulative	322	543	759	1,267	1,824	2,202	2,510	2,726	3,111	3,501	3,793	4,035	4,311	4,582	4,720	4,762	4,804	4,846
Surplus/deficit	-	-17	-81	-	-	-	-	-	-	-	-	-	-	-	-	-5	-284	-563
Five year requirement	1,400	1,400	1,400	1,400	1,400	1,441	1,482	1,523	1,564	1,605	1,605	1,605	1,605	1,605				
add deficit/surplus	1,400	1,400	1,417	1,481	1,400	1,441	1,482	1,523	1,564	1,605	1,605	1,605	1,605	1,605				
5% Buffer	70	70	71	74	280	288	296	305	313	321	321	321	321	321				
Total req	1,470	1,470	1,488	1,555	1,680	1,729	1,778	1,828	1,877	1,926	1,926	1,926	1,926	1,926				
Five year supply	1,824	1,880	1,967	1,967	1,844	1,677	1,591	1,525	1,585	1,471	1,219	969	769	535				
Surplus/deficit	354	410	479	412	164	-52	-187	-303	-292	-455	-707	-957	-1,157	-1,391				
5YHLS	6.20	6.39	6.61	6.32	5.49	4.85	4.47	4.17	4.22	3.82	3.16	2.52	2.00	1.39				

Base date 2023/24, end date 2040/41 – 20% buffer from 2026/27

	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	40/41
Requirement	280	280	280	280	280	280	280	280	280	321	321	321	321	321	321	321	321	321
Cumulative	280	560	840	1,120	1,400	1,680	1,960	2,240	2,520	2,841	3,162	3,483	3,804	4,125	4,446	4,767	5,088	5,409
Delivery	322	221	216	508	557	378	308	216	385	390	292	242	276	271	138	42	42	42
Cumulative	322	543	759	1,267	1,824	2,202	2,510	2,726	3,111	3,501	3,793	4,035	4,311	4,582	4,720	4,762	4,804	4,846
Surplus/deficit	-	-17	-81	-	-	-	-	-	-	-	-	-	-	-	-	-5	-284	-563
Five year requirement	1,400	1,400	1,400	1,400	1,400	1,441	1,482	1,523	1,564	1,605	1,605	1,605	1,605	1,605				
add deficit/surplus	1,400	1,400	1,417	1,481	1,400	1,441	1,482	1,523	1,564	1,605	1,605	1,605	1,605	1,605				
20% Buffer	70	70	71	296	280	288	296	305	313	321	321	321	321	321				
Total req	1,470	1,470	1,488	1,777	1,680	1,729	1,778	1,828	1,877	1,926	1,926	1,926	1,926	1,926				
Five year supply	1,824	1,880	1,967	1,967	1,844	1,677	1,591	1,525	1,585	1,471	1,219	969	769	535				
Surplus/deficit	354	410	479	190	164	-52	-187	-303	-292	-455	-707	-957	-1,157	-1,391				
5YHLS	6.20	6.39	6.61	5.53	5.49	4.85	4.47	4.17	4.22	3.82	3.16	2.52	2.00	1.39				

Appendix D: Rolling Trajectory adjusted to remove delivery from HA2, HA3 and HA1/03 from the first five year post adoption. Delivery from Hart not included.

Base date 2023/24, end date 2040/41 – 5% buffer in 2026/27

	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	40/41
Requirement	321	321	321	321	321	321	321	321	321	321	321	321	321	321	321	321	321	321
Cumulative	321	642	963	1,284	1,605	1,926	2,247	2,568	2,889	3,210	3,531	3,852	4,173	4,494	4,815	5,136	5,457	5,778
Delivery	322	221	216	508	557	378	308	216	385	390	292	242	276	271	138	42	42	42
Cumulative	322	543	759	1,267	1,824	2,202	2,510	2,726	3,111	3,501	3,793	4,035	4,311	4,582	4,720	4,762	4,804	4,846
Surplus/deficit	-	-99	-204	-17	-	-	-	-	-	-	-	-	-	-	-95	-374	-653	-932
Five year requirement	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605				
add deficit/surplus	1,605	1,605	1,704	1,809	1,622	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605				
5% Buffer	80	80	85	90	324	321	321	321	321	321	321	321	321	321				
Total req	1,685	1,685	1,789	1,899	1,946	1,926	1,926	1,926	1,926	1,926	1,926	1,926	1,926	1,926				
Five year supply	1,824	1,880	1,967	1,967	1,844	1,677	1,591	1,525	1,585	1,471	1,219	969	769	535				
Surplus/deficit	139	195	178	68	-102	-249	-335	-401	-341	-455	-707	-957	-1,157	-1,391				
5YHLS	5.41	5.58	5.50	5.18	4.74	4.35	4.13	3.96	4.11	3.82	3.16	2.52	2.00	1.39				

Base date 2023/24, end date 2040/41 – 20% buffer from 2026/27

	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	40/41
Requirement	321	321	321	321	321	321	321	321	321	321	321	321	321	321	321	321	321	321
Cumulative	321	642	963	1,284	1,605	1,926	2,247	2,568	2,889	3,210	3,531	3,852	4,173	4,494	4,815	5,136	5,457	5,778
Delivery	322	221	216	508	557	378	308	216	385	390	292	242	276	271	138	42	42	42
Cumulative	322	543	759	1,267	1,824	2,202	2,510	2,726	3,111	3,501	3,793	4,035	4,311	4,582	4,720	4,762	4,804	4,846
Surplus/deficit	-	-99	-204	-17	-	-	-	-	-	-	-	-	-	-	-95	-374	-653	-932
Five year requirement	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605				
add deficit/surplus	1,605	1,605	1,704	1,809	1,622	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605	1,605				
20% Buffer	80	80	85	362	324	321	321	321	321	321	321	321	321	321				
Total req	1,685	1,685	1,789	2,171	1,946	1,926	1,926	1,926	1,926	1,926	1,926	1,926	1,926	1,926				
Five year supply	1,824	1,880	1,967	1,967	1,844	1,677	1,591	1,525	1,585	1,471	1,219	969	769	535				
Surplus/deficit	139	195	178	-204	-102	-249	-335	-401	-341	-455	-707	-957	-1,157	-1,391				
5YHLS	5.41	5.58	5.50	4.53	4.74	4.35	4.13	3.96	4.11	3.82	3.16	2.52	2.00	1.39				

To: Alex Barker Simpson
From: Drew Bennett
Company: Vistry Group
SLR Consulting Limited
cc: James Greene, Charles Collins
(Savills)
Date: 19 November 2025
Project No. 439.061349.00001

**RE: Examination of the Surrey Heath Local Plan
Wastewater Infrastructure Review**

1.0 Introduction

SLR Consulting have been instructed by Vistry Group to provide a wastewater infrastructure review in relation to the Surrey Heath Borough Council (SHBC) Local Plan.

Limitations

SLR have been provided with the following information for review as part of this technical memorandum, and the following sections have been produced on this basis:

- REP 1A, Environment Agency position statement regarding water quality risks due to wastewater capacity pressures related to the Lightwater STW.
- REP 1B, Environment Agency position statement regarding water quality risks due to wastewater capacity pressures related to the Camberley STW.
- REP3, Surrey Heath Local Plan Wastewater Infrastructure Updated, dated September 2025.
- Statement of Response, JBA Consulting, dated October 2025.
- Surrey Heath Water Cycle Study, Stage 2, JBA Consulting, dated March 2025.
- Statement of Common Ground SCG08, Pre-Submission with Submission Update with Thames Water, dated November 2024.
- Statement of Common Ground SCG05 with the Environment Agency, Surrey Heath Borough Council, dated November 2024.
- A Vision for Fair Oaks Garden Village, Stantec, Vistry Group, Savills, SLR, dated September 2024.
- Consultation Statement, Appendix 4, Surrey Heath Borough Council, dated July 2024.
- Hart, Rushmoor and Surrey Heath Water Cycle, AECOM Water, dated May 2017.

2.0 Background

Thames Water is the sole water and wastewater service provider for Surrey Heath Borough. It collects and treats wastewater from domestic and commercial premises, with some areas operating combined foul and surface water systems. The Surrey Heath Local Plan (2019–2038) proposes significant housing and employment growth, which will place additional pressure on existing wastewater infrastructure.

Under the Water Framework Directive (WFD), waterbodies must not deteriorate and should achieve “Good Status” by 2027. Water companies, such as Thames Water, are duty holders under the WFD regulations and have a variety of responsibilities to invest in infrastructure to reduce pollution, improve resilience and ensuring operations do not cause deterioration of water body status. As stated in the JBA Consulting Statement of Response, Thames Water has duties under the Water Industry Act to provide wastewater collection and treatment, and the EA regulates the discharges in accordance with the Environmental Permitting Regulations.

The Environment Agency (EA) is the competent authority for England, and has a variety of responsibilities, including monitoring waterbodies and classifying status, setting environmental objectives, advising on planning and permitting for activities that could affect waterbodies, and enforcing compliance through permits, including taking action against polluters such as water companies.

The UK has a variety of key challenges in meeting the WFD objectives. Most UK waterbodies do not meet “good ecological status”, for reasons such as nutrient enrichment, sedimentation, and physical modifications to rivers. Additional challenges/causes are listed below:

- Pollution from agriculture due to run-off containing fertilisers, pesticides, and waste.
- Stormwater runoff and combined sewer overflows (CSOs) discharging untreated sewage during heavy rainfall.
- Aging sewer infrastructure and population growth.
- Climate change impacts increasing frequency of extreme weather events.
- Groundwater contamination.
- Funding and investment gaps from water companies.
- Regulatory and government complexity can lead to fragmented decision making.

Thames Water, and other water companies, use the AMP (Asset Management Process) process to plan and invest in infrastructure over fixed periods. This process is overseen by Ofwat and ensures that water companies maintain and improve assets by balancing service quality, environmental compliances, and affordability for customers. As part of this process, water companies must align with environmental regulations (EA permits, WFD), whilst taking into account customer expectations and climate resilience. With regard to wastewater infrastructure upgrades, the key focus areas are reducing storm overflows, upgrading treatment works, network resilience and digital monitoring.

Thames Water operates in 5-year funding cycles, AMP8 for the period 2025–2030, and AMP9 for the period 2030–2035.

3.0 Literature Review

The supplied documentation has been reviewed, specifically in the context of wastewater infrastructure related to the SHBC Local Plan. A summary of the four key documents in relation to the wastewater infrastructure is provided below:

REP 1A, Environment Agency position statement regarding water quality risks due to wastewater capacity pressures related to the Lightwater STW.

Lightwater Sewage Treatment Works (STW) serves Lightwater, Bagshot, and parts of Sunningdale within Surrey Heath Borough. As stated in Section 2, under the Water Framework Directive (WFD), waterbodies must not deteriorate and should achieve “Good Status” by 2027. The document states that the current status of Hale/Mill Bourne waterbody is “Moderate”, mainly due to phosphate pollution from water industry discharges.

Phosphate pollution in waterbodies causes eutrophication, which is a process where excess nutrients stimulate growth of algae and aquatic plants. This can cause loss of biodiversity, water quality issues, and sediment accumulation.

The EA highlighted a number of key issues relating to capacity issues at Lightwater STW, and risk to water quality and meeting statutory environmental objectives. Through the EA’s regulatory duties, it has been noted that Lightwater STW has exceeded its permitted Dry Weather Flow (DWF) limits Q80 and Q90 flow in 3 of the last 4 years, indicating capacity pressures.

DWF is the average daily flow of wastewater in a system during dry weather conditions, i.e., no rainfall, and is used in sewer design and treatment plant sizing to ensure capacity for normal conditions. The Q80 and Q90 limits are used to design and monitor compliance, and are the flow value that is exceeded 80% and 90% of the time respectively. The EA uses the Q90 limit as the trigger for enforcement or requiring investigation by the operator.

Exceedances of this kind increase risk of environmental deterioration under WFD regulations, and the consistent exceedance of Q80 highlights the need for an updated DWF permit to protect the environment and allow “good” status of Hale/Mill Bourne waterbody to be achieved.

Thames Water has not yet applied for a new DWF permit or committed to upgrades, creating uncertainty about future capacity. At the stage of writing the response, the EA stated that they have no assurances on when upgrade will be delivered, and do not believe there will be sufficient capacity at the Lightwater STW to cope with increased discharges.

New developments connecting to mains sewer will increase load on Lightwater STW, raising nutrient concentrations and water quality risks. For non-EIA developments, individual impact is likely small, but cumulative impacts from multiple developments and planned growth pose significant risks.

With regard to the Local Plan, the following is stated within the response:

- Surrey Heath Local Plan (2019–2038) acknowledges Lightwater STW is at capacity and requires upgrades.
- A Water Cycle Study (Feb 2025) confirms the need for increased flow permits and treatment capacity.
- Engagement between LPA and Thames Water is ongoing to align growth with infrastructure improvements.

The recommendations within the response are summarised as follows:

- Cumulative impact assessment of planned growth undertaken to assess risk to water quality due to increased discharges to the Lightwater STW.
- LPAs should liaise with Thames Water for timelines and strategies to ensure wastewater capacity aligns with growth.
- Thames Water must provide future flow projections (Q80/Q90) and a detailed foul water strategy with timelines for STW improvements.
- Upgrades should include tighter nutrient discharge limits, increased treatment capacity, and storm tank enhancements.

REP 1B, Environment Agency position statement regarding water quality risks due to wastewater capacity pressures related to the Camberley STW.

Camberley STW serves Camberley, Frimley, and Farnborough across Surrey Heath and Rushmoor districts. As stated in Section 2, under the Water Framework Directive (WFD), waterbodies must not deteriorate and should achieve “Good Status” by 2027. The document states that the current status of Blackwater waterbody is “Moderate”, due to phosphate and macrophyte-related issues linked to water industry discharges.

Phosphate and macrophyte pollution in waterbodies cause eutrophication, which is a process where excess nutrients stimulate growth of algae and aquatic plants. This can cause loss of biodiversity, water quality issues, reduced flow and navigation issues, and sediment accumulation.

The EA highlighted a number of key issues relating to capacity issues at Camberley STW, and risk to water quality and meeting statutory environmental objectives. Through the EA’s regulatory duties, it has been noted that Camberley STW has exceeded its permitted Dry Weather Flow (DWF) limits (Q80 and Q90) in 2023 and 2024, indicating capacity pressures.

Thames Water has not yet applied for a new DWF permit or committed to upgrades, creating uncertainty about future capacity. At the stage of writing the response, the EA stated they are uncertain that there will be sufficient capacity at the Camberley STW to cope with increased discharges due to new development.

With regard to the Local Plan, the following is stated within the response:

- Hart Local Plan (2032) and Surrey Heath Local Plan (2019–2038) acknowledges Camberley STW is at capacity and requires upgrades.
- Water Cycle Study (Feb 2025) confirms the need for increased flow permits and treatment capacity.
- Engagement between LPA and Thames Water is ongoing to align growth with infrastructure improvements.

The recommendations within the response are summarised as follows:

- Cumulative impact assessment of planned growth is undertaken to assess risk to water quality due to increased discharges to the Camberley STW.
- LPAs should liaise with Thames Water for timelines and strategies to ensure wastewater capacity aligns with growth.
- Thames Water must provide future flow projections (Q80/Q90) and a detailed foul water strategy with timelines for STW improvements.
- Upgrades should include tighter nutrient discharge limits, increased treatment capacity, and storm tank enhancements.

REP3, Surrey Heath Local Plan Wastewater Infrastructure Updated, dated September 2025.

As discussed in Section 2, Thames Water operates in 5-year funding cycles, and the document details planned upgrades in both AMP8 and AMP9.

Upgrades are planned at both Lightwater STW and Camberley STW in AMP8, with anticipated completion expected around 2028. These upgrades will focus on improving treatment capability and reduce untreated discharges during wet weather. However, the upgrades will not provide an increase in volumetric capacity. The planned upgrades are summarised below:

Lightwater STW:

- Inlet works with new screens
- New balancing tanks
- New storm tanks
- Minor modifications

Camberley STW:

- Inlet works modification
- New storm tanks
- Minor modifications

Further upgrades are planned at Lightwater STW and Camberley STW in AMP9 (2030 – 2035) to increase capacity for growth.

Thames Water conclude that the proposed development contained within Surrey Heath Borough Council's Local Plan would not contribute to unacceptable levels of water pollution as it would not cause deterioration of a quality element to a lower status class. The document

addresses the EA position statements summarised above and concludes that the EA findings are not supported by the outcome of the Water Cycle Study.

Statement of Response, JBA Consulting, dated October 2025.

JBA Consulting prepared a statement responding to representations from the EA and Thames Water regarding wastewater treatment capacity and water quality risks for the Surrey Heath Local Plan.

Following a review of the representations (REP1A, REP1B, REP3) provided a response, which assessed four questions, as follows:

- To what extent has SHBC sought to identify capacity issues in wastewater infrastructure, and to communicate these to the EA and Thames Water?
- What contribution will the Local Plan policies make to the exceedance of capacity at Camberley and Lightwater WwTW (Waste Water Treatment Works)?
- Has sustainable growth been promoted in the Local Plan?
- Will the Local Plan growth lead to an unacceptable level of water pollution?

The Statement of Response goes on to conclude the following:

- The Local Plan evidence base has already assessed the cumulative impact on planned growth, which has been based on growth projected to 2038, the end of the Local Plan period.
- Local Plan growth will not cause unacceptable water pollution if planned upgrades occur.
- The exceedance of the permitted dry weather flows at Lightwater and Camberley are not as a result of planning policy, and are legacy issues caused by the failure of Thames Water and their regulators to plan for growth.
- SHBC have considered sustainable growth in the context of directing growth towards settlements with greater wastewater treatment capacity. With all three treatment works in SHBC experiencing capacity issues, there is no more sustainable location for development in relation to wastewater.
- The cumulative impact modelling shows that the increased om wastewater discharges will not cause a deterioration as defined in accordance with the WFD.

4.0 Discussion

Following the review of the documents in Section 3, it is clear that capacity of the Camberley and Lightwater STW are an issue, with a variety of conclusions taken from the Surrey Heath Water Cycle Study completed by JBA Consulting.

Within the context of the Water Cycle Study, additional challenges should be considered given the current issues with Camberley WwTW and Lightwater WwTW, as follows:

- Growth Pressure: Increased population and per-capita consumption will overload existing sewerage infrastructure, creating risks of sewer flooding and increased storm overflow discharges.
- Climate Change: More intense rainfall and infiltration reduce available headroom at WwTWs.
- Environmental Regulation: The EA may tighten effluent consents to maintain “load standstill” and prevent water quality deterioration, requiring costly upgrades.

Camberley WwTW and Lightwater WwTW are operating at or near capacity and have exceeded Dry Weather Flow (DWF) limits in recent years. Exceedances increase risk of environmental deterioration under the Water Framework Directive (WFD). In addition in four monitored storm overflows; one exceeds the investigation threshold (>40 operations/year), and all exceed the long-term target of ≤10 spills/year set for 2050.

The EA have set out their positions in REP1A and REP1B, which refers to statements within the Surrey Heath Water Cycle Study – Stage 2 as follows:

- *“Within Surrey Heath, Camberley WwTW and Lightwater WwTW have been identified as operating at capacity and will require upgrades and/or change in permit to serve additional growth over the Local Plan Period”.*
- *“Lightwater and Camberley WwTW are currently problematic and are likely to be close to or exceed their permit during the plan period. An increase in flow permit, and/or upgrades to treatment capacity will be required at these WwTW”.*

In reference to next steps, the EA state that Thames Water need to provide future Q80 and Q90 flow projections to help assess the environmental risks as part of the Water Cycle.

Within the EA representations there is no reference to the Thames Water representation and the JBA Consulting Statement of Response, and it is therefore assumed that at the stage of writing this Technical Memorandum, that the EA have either not seen the additional documents or have not responded. It is therefore unclear whether the EA will update their recommendations or view with regards to the Water Cycle Study and permit exceedances. With this in mind, it should be considered a significant risk to the development of the existing Local Plan as updated permits may not be supplied to Thames Water.

Thames Water have set on their response in REP3, detailing the proposed upgrades in the AMP8 and AMP9 periods to improve the ability to treat the volumes of incoming sewerage in AMP8 and deliver capacity for growth AMP9. As stated above, it is unclear from the EA responses whether the proposed upgrades have been considered.

As stated in the literature review, Thames Water conclude that the proposed development would not contribute to unacceptable levels of water pollution as it would not cause deterioration of a quality element to a lower status class. The document addresses the EA position statements and concludes that the EA findings are not supported by the outcome of the Water Cycle Study.

The discrepancies in the representations from the EA and Thams Water should be noted, as without timely upgrades, it is likely developments within the Local Plan would face delays or planning conditions restricting occupation. Phased delivery should align with infrastructure improvements, as detailed within the proposed policy amendments in the Statement of Common Ground between the EA and SHBC.

Following the representations by the EA and Thames Water, JBA provided a Statement of Response which generally supported the SHBC Local Plan based upon the cumulative assessment undertaken and confirmation from Thames Water of the planned upgrades at Lightwater and Camberley before the end of the projected growth (2038). This document goes on to state that the exceedances are not as a result of planning policy, and are a result of historic failures by Thames Water and their regulators.

It is stated within JBA Consulting Statement of Response that as all the treatment works are experiencing capacity issues, there is no more sustainable location for development when considering wastewater treatment.

The representations and responses provided do not consider any developments that would not connect into the three treatment works experiencing capacity issues. Chertsey WwTW is not assessed in detail within this Water Cycle Study because it primarily serves growth outside Surrey Heath. However, it is noted in relation to potential future employment sites located on the boundary of Surrey Heath Borough.

Flow data from the last three years indicates that Chertsey WwTW currently has spare capacity. This suggests that while it may serve some boundary sites, its main role will be to accommodate growth from areas outside Surrey Heath. No immediate constraints or upgrade requirements for Chertsey WwTW are identified in this study. It is mentioned alongside Woking WwTW as part of a note on cross-boundary infrastructure considerations. Considering the flow data indicates that Chertsey WwTW has spare capacity, it is likely that developments that connect into this infrastructure will not cause pollution to waterbodies similar to Lightwater

WwTW and Camberley WwTW, which are currently exceeding permits in pollution that will likely cause loss of biodiversity and water quality issues.

It is understood that the Fair Oaks Garden Village development, to be developed by Vistry Group, would connect into Chertsey WwTW. The new village at Fair Oaks Airport, located on the land between Chertsey Road and The Bourne, has significant potential to support Surrey Heath Borough Council in meeting present and future housing needs, with up to 1800 units being provided.

As discussed above, developments connecting into Chertsey WwTW have not been considered as part of the Water Cycle Study, as such potentially viable developments such as Fair Oaks have not been considered. Provided Chertsey WwTW has the available capacity support growth of this scale, it will create significantly less risks to the environment and issues related to the Water Framework Directive, and deterioration of waterbodies within the area. Given there are other potential options within Surrey Heath Borough Council, it can be concluded that there is other “more sustainable” options for development with regards to impacts on wastewater infrastructure.

At the stage of writing this report, the status of Chertsey WwTW permits with the EA is not known, or the existing status of the waterbodies it connects into with regard to the WFD requirements.

5.0 Conclusions/Recommendations

The EA highlighted a number of key issues relating to capacity issues at Lightwater STW and Camberley STW, and risks to water quality and meeting statutory environmental objectives. Through the EA's regulatory duties, it has been noted that Lightwater STW has exceeded its permitted Dry Weather Flow (DWF) limits (Q80 and Q90) over the past 2 – 4 year period, indicating capacity pressures. Exceedances of this kind increase risk of environmental deterioration under WFD regulations.

EA stated that Thames Water have not applied for a new WDF permit or committed to upgrades, and do not believe there will be sufficient capacity at the Lightwater STW and Camberley STW to cope with increased discharges. The EA also state that Thames Water need to provide future Q80 and Q90 flow projections to help assess the environmental risks as part of the Water Cycle.

Thames Water have stated that upgrades are planned at both Lightwater STW and Camberley STW in AMP8, with anticipated completion expected around 2028. These upgrades will focus on improving treatment capability and reduce untreated discharges during wet weather. Further upgrades are planned at Lightwater STW and Camberley STW in AMP9 to increase capacity for growth.

Thames Water conclude that the proposed development contained within Surrey Heath Borough Council's Local Plan would not contribute to unacceptable levels of water pollution as it would not cause deterioration of a quality element to a lower status class.

JBA Consulting produced a response following the representations provided by the EA and Thames Water, with the key conclusions being as follows:

- Local Plan growth will not cause unacceptable water pollution if planned upgrades occur.
- There is no more sustainable location for development in relation to wastewater.
- The cumulative impact modelling shows that the increased in wastewater discharges will not cause a deterioration as defined in accordance with the WFD.

The representations and responses provided do not consider any developments that would not connect into the three treatment works experiencing capacity issues. Chertsey WwTW is not assessed in detail within this Water Cycle Study because it primarily serves growth outside Surrey Heath.

The flow data referenced in the Water Cycle Study indicates that Chertsey WwTW has spare capacity, and it is likely that developments that connect into this infrastructure will not cause pollution to waterbodies similar to Lightwater WwTW and Camberley WwTW.



Developments connecting into Chertsey WwTW have not been considered as part of the Water Cycle Study, as such potentially viable developments such as Fair Oaks have not been considered. It is envisaged that any connections into the Chertsey WwTW would be subject to a similar process, such as the production of an updated Water Cycle Study, and discussions with the EA and Thames Water.

SLR Consulting Limited



Drew Bennett

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