

Surrey Heath Borough Council

Local Development Framework 2006 – 2026

Housing Needs Options Consultation Responses and Officer Responses

Section 1 – Definition of Affordable Housing.

Possible Options:

1A – Retain the existing Local Plan definition.

1B – Adopt the definition set out in the new PPS3.

1C – Adopt the definition set out in the Surrey Heath Draft Housing Strategy 2006

1D – Adopt the definition set out in the Surrey Structure Plan 2004

Name	Organisation	Option Selected	Additional Comments	Officer Response
Cllr Mrs Pinder	Surrey Heath Borough Council	1D		Consideration is being given to a preferred option which will be in accordance with current national guidance.
Mr J Russell		1B	The relationship which 1B has with local incomes and local house prices seems highly relevant in achieving a standard for what constitutes affordable housing in the Borough of Surrey Heath.	
Mr D Fish		1B		
Dr E Bridson		1A		
Mr A Bateman	The Planning Bureau	1B		
Mr G Irvin	Showmen's Guild	1C		
Mr D Harman	Mansard Country Homes Ltd	1A		
Mr Couzens		1B		
Mr I Sowerby	Bell Cornwall	1B		

Name	Organisation	Option Selected	Additional Comments	Officer Response
Mr D V Chesneau	The Camberley Society	1C	Definition 1C is all-embracing and admirably brief! Definitions 1B and 1D are long, and they include the policy that affordable housing should remain so in perpetuity. Whilst this policy might be desirable, it has no bearing on whether housing is affordable now.	<p>Consideration is being given to a preferred option which will be in accordance with current national guidance.</p> <p>Evidence of local need for affordable housing will be identified with the supporting text.</p>
Mr J Cheston	GOSE	1B		Consideration is being given to a preferred option which will be in accordance with current national guidance.
Mr T Wells	Chairman of Surrey Heath Tenants Federation		<p>There has been a lot written in the press about affordable housing in the Country.</p> <p>I attend national housing conferences. Over the past 20 years the same problems of scarcity and affordable housing is trotted out by politicians and housing professionals.</p> <p>I believe that the answer is there and they are the people who can make the change, but they will not because they would upset the private landowners, property developers, estate agents, owner occupiers, who find this is a way of maximising monies by selling.</p> <p>I have stated a simple equation, the land mass stays the same but the population is increasing by immigration into this country. The people still expect the countryside, but this will all disappear if present policies continue. The answer is discontinue owner-occupiers/private housing and revert to all good quality social rented housing. This will stop superficial property prices.</p> <p>The Housing problem must be acted on NOW before it is too late.</p>	<p>Government's key housing policy goal is to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live. To achieve this, the Government is seeking a wide choice of high quality homes, both affordable and market housing, to address the requirements of the community. Affordable housing is designed specifically to provide for those individuals whose housing needs are not met by the private market.</p> <p>The Government is also seeking to improve affordability across the housing market by increasing the supply of housing.</p>

Name	Organisation	Option Selected	Additional Comments	Officer Response
Mr T Price	Windlesham Parish Council	1D	It is most important to ensure that subsidise are retained, pro-rate. In perpetuity to maintain continuity of affordability for future occupants.	<p>Agreed. This issue will be addressed in the preferred options for affordable housing and supporting text.</p> <p>Consideration is being given to a preferred option which will be in accordance with current national guidance.</p>
Mr R Evans	Surrey County Council	1B	Using the PPS3 (Housing) definition should avoid potential difficulties arising out of the interpretation of local definitions vis a vis national definitions. We support.	Support noted. Consideration is being given to a preferred option which will be in accordance with current national guidance.

Section 2 – Providing Affordable Housing in Urban Areas

Possible Options:

- 2A – Retain existing Local Plan Policy (H10) of requiring affordable housing on sites of 25 gross or more units at a proportion of 25%.
- 2B – Require affordable housing on sites of 15 net units or more and/or sites of 0.5ha or larger, at a proportion of 30%.
- 2C – Require affordable housing on sites of 15 net units or more and/or sites of 0.5ha or larger, at a proportion of 35%.
- 2D – Require affordable housing on sites of 15 net units or more and/or sites of 0.5ha or larger, at a proportion of 40%.
- 2E – Require affordable housing on sites of 15 net units or more and/or sites of 0.5ha or larger at a proportion of 30%. In addition, require developer contributions towards the provision of affordable housing on all sites of less than 15 net units and/or less than 0.5 hectares.
- 2F – Require affordable housing on sites of 15 net units or more and/or sites of 0.5ha or larger at a proportion of 35%. In addition, require developer contributions towards the provision of affordable housing on all sites of less than 15 units and/or less than 0.5 hectares.
- 2G – Require affordable housing on sites of 15 net units or more and/or sites of 0.5ha or larger at a proportion of 40%. In addition, require developer contributions towards the provision of affordable housing on all sites of less than 15 net units and/or less than 0.5 hectares.

Name	Organisation	Option Selected	Additional Comments	Officer Response
Cllr Mrs Pinder	Surrey Heath Borough Council	2G		Consideration is being given to a preferred option which will reduce the threshold for affordable housing in urban areas to 15 in line with Government guidance. Increasing the proportion to 40% with developer contributions on sites under the threshold is also being considered and will be supported by further work into financial viability as part of the housing market assessment.
Mr J Russell		2B	The key here is surely to ensure there is no shortfall of affordable housing, whatever the figure will be in the updated Housing Needs Survey. It may be that 2B will bring the requirement into balance.	<p>Consideration is being given to a preferred option which will reduce the threshold for affordable housing in urban areas to 15 in line with Government guidance. Increasing the proportion to 40% with developer contributions on sites under the threshold is also being considered and will be supported by further work into financial viability as part of the housing market assessment.</p> <p>The affordable housing annual requirement specified in the Housing Needs Survey (2002), which is currently being updated, is unlikely to be met. However, the Borough Council is committed</p>

Name	Organisation	Option Selected	Additional Comments	Officer Response
				to providing as much affordable housing as is financially viable through new developments.
Mr D Fish			None of the above. Am not convinced that “mixed” housing is a good idea.	The Borough Council is committed to providing sustainable, inclusive, mixed communities in line with national guidance (PPS3).
Dr E Bridson			Suggested new option – require developer contributions to the development of affordable housing in or near to the Borough.	It is unlikely that developer contributions alone will provide for the level of affordable housing needed within the Borough due to the costs associated with obtaining and developing land. Therefore, any preferred option will require the provision of affordable housing on-site as part of a development in addition to developer contributions.
Mr A Bateman	The Planning Bureau	2B	Exceptions for providers of Elderly housing as this also a growing problem in the Borough.	In light of a letter received in from GOSE in February 2006 to all southeast local authorities, all sites over the adopted threshold should make a contribution to affordable housing including sheltered schemes.
Mr G Irvin	Showmen's Guild	2A		Retaining the existing Local Plan policy is unlikely to meet demonstrated need for affordable housing.
Mr D Harman	Mansard Country Homes Ltd	2A		Therefore, consideration is being given to a preferred option which will reduce the threshold for affordable housing in urban areas to 15 in line with Government guidance. Increasing the proportion to 40% with developer contributions on sites under the threshold is also being considered and will be supported by further work into financial viability as part of the housing market assessment.
Mr Couzens		2F	The options will result in the adoption of a single 'blanket' policy covering all sites, with subsequent loss of opportunity and flexibility. A sliding scale policy would widen applications to smaller sites: 0.25 hectares – 0.5 hectares = 25%; 0.5 – 1 hectare = 30% with contribution; over 1 hectare – 40% with contribution.	Consideration is being given to a preferred option which will reduce the threshold for affordable housing in urban areas to 15 in line with Government guidance. Increasing the proportion to 40% with developer contributions on sites under the threshold is also being considered and will be supported by further work into financial viability as part of the housing market assessment. There will

Name	Organisation	Option Selected	Additional Comments	Officer Response
			<p>The selection above represents the most effective 'blanket' policy should flexibility be abandoned.</p> <p>Note – the adopted policy should refer to site size as well as the number of units provided.</p>	<p>be an element of flexibility built into the preferred option to react to different circumstances.</p> <p>The preferred option will refer to both site size as well as the number of units.</p>
Mr I Sowerby	Bell Cornwall	2B	See below.	<p>Consideration is being given to a preferred option which will reduce the threshold for affordable housing in urban areas to 15 in line with Government guidance. Increasing the proportion to 40% with developer contributions on sites under the threshold is also being considered and will be supported by further work into financial viability as part of the housing market assessment.</p>
Mr L Spiller	Frimhurst Farm Industrial Centre Director	2A		<p>Retaining the existing Local Plan policy is unlikely to meet demonstrated need for affordable housing. Therefore, consideration is being given to a preferred option which will reduce the threshold for affordable housing in urban areas to 15 in line with Government guidance. Increasing the proportion to 40% with developer contributions on sites under the threshold is also being considered and will be supported by further work into financial viability as part of the housing market assessment.</p>
Mr J Cheston	GOSE		<p>This is a local decision. As the SA points out, the selection of the preferred policy option will need to be informed by the Housing Market Assessment and the likely impact on viability of housing overall.</p>	<p>Consideration is being given to a preferred option which will reduce the threshold for affordable housing in urban areas to 15 in line with Government guidance. Increasing the proportion to 40% with developer contributions on sites under the threshold is also being considered and will be supported by further work into financial viability as part of the housing market assessment.</p>
Mr T Wells	Chairman of Surrey Heath Tenants Federation	2G	<p>All future housing to be social rented accommodation.</p>	<p>Consideration is being given to a preferred option which will reduce the threshold for affordable housing in urban areas to 15 in line with Government guidance. Increasing the proportion</p>

Name	Organisation	Option Selected	Additional Comments	Officer Response
				<p>to 40% with developer contributions on sites under the threshold is also being considered and will be supported by further work into financial viability as part of the housing market assessment.</p> <p>Options 4A to 4D address the issue of the mix of affordable housing.</p>
Mr T Price	Windlesham Parish Council	2E	Balance of developer contributions against prevailing market conditions should not be too constrictive.	Consideration is being given to a preferred option which will reduce the threshold for affordable housing in urban areas to 15 in line with Government guidance. Increasing the proportion to 40% with developer contributions on sites under the threshold is also being considered and will be supported by further work into financial viability as part of the housing market assessment.
Mr A Ransome	Fairview New Homes Ltd		Fairview New Homes consider that setting specific targets would be unjustified. Guidance in Circular 6/98 states that policies for affordable housing should set 'indicative' targets for specific sites and that the level should be negotiated having regard to site circumstances. PPS3 states that housing targets should reflect the economic viability of land for housing within the area taking into account risks to delivery. FNH request that the level of affordable housing in schemes is determined with regard to individual site characteristics such as site costs and constraints as well as financial viability. FNH objects to options 2A, 2B, 2C, 2D, 2E, 2F and 2G as all these options could have a detrimental effect on the viability of development as they seek specific high-level thresholds with options 2E, 2F and 2G requiring developer contributions towards housing on all sites with less than 15 units. This may prohibit development if applied inflexibly without having the regard to the merits of each case. PPG3 states that LPAs should work with	<p>Guidance in Circular 6/98 no longer applies. This has been replaced by PPS3 and Delivering Affordable Housing.</p> <p>Further work into financial viability is being undertaken as part of the Housing Market Assessment.</p> <p>Affordable housing policies should provide some certainty for developers as to what will be required. However, there will be an element of flexibility built into the preferred option to respond to exceptional circumstances.</p>

Name	Organisation	Option Selected	Additional Comments	Officer Response
			developers to achieve realistic assumptions.	
Mr R Evans	Surrey County Council	2G	With amendments. The policy should require affordable housing on sites of 15 or more dwellings, but not specify an area threshold, in line with PPS3. We would support such an amendment.	<p>Consideration is being given to a preferred option which will reduce the threshold for affordable housing in urban areas to 15 in line with Government guidance. Increasing the proportion to 40% with developer contributions on sites under the threshold is also being considered and will be supported by further work into financial viability as part of the housing market assessment.</p> <p>Although PPS3 does not specifically mention setting area thresholds we consider that there is a specific local need for this to be included within an affordable housing policy. Due to the character of the some parts of the Borough, setting an area threshold will mean that lower density sites will be required to provide affordable housing on-site. This would also help to provide larger family size affordable homes for which there is a specific local need.</p>

Section 3 – Providing Affordable Housing in Rural Areas

Possible Options:

- 3A – Continue to have no differing requirement for affordable housing in rural areas (25 gross units or more and/or on sites of 1 hectare or larger at a proportion of 25%).
- 3B – Require affordable housing on sites of 10 net units or more and/or on sites of 0.35 hectares or larger.
- 3C – Require affordable housing on sites of 5 net units or more and/or on sites of 0.2 hectares.

Further Options relating to Option 3B.

- 3D – At a proportion of 30%.
- 3E – At a proportion of 35%.
- 3F – At a proportion of 40%.
- 3G – At a proportion of 30%. In addition require developer contributions towards the provision of affordable housing on all sites of less than 10 net units and/or less than 0.35 hectares.
- 3H – At a proportion of 35%. In addition require developer contributions towards the provision of affordable housing on all sites of less than 10 net units and/or less than 0.35 hectares.
- 3I – At a proportion of 40%. In addition require developer contributions towards the provision of affordable housing on all sites of less than 10 net units and/or less than 0.35 hectares.

Further Options relating to Option 3C.

- 3J – At a proportion of 30%.
- 3K – At a proportion of 35%.
- 3L – At a proportion of 40%.
- 3M – At a proportion of 30%. In addition require developer contributions towards the provision of affordable housing on all sites of less than 5 net units and/or less than 0.2 hectares.
- 3N – At a proportion of 35%. In addition require developer contributions towards the provision of affordable housing on all sites of less than 5 net units and/or less than 0.2 hectares.
- 3O – At a proportion of 40%. In addition require developer contributions towards the provision of affordable housing on all sites of less than 5 net units and/or less than 0.2 hectares.

Name	Organisation	Option Selected	Additional Comments	Officer Response
Cllr Mrs Pinder	Surrey Heath Borough Council	3C/3O		As there is a more pressing need for affordable housing in rural areas and very few large sites come forward consideration is being given to a preferred option which will reduce the threshold for affordable housing to 5 units. Increasing the proportion to 40% with developer contributions on sites under the threshold is also being considered. This will be supported by further work into financial viability as part of the housing market assessment.
Mr J Russell		3B/3D		
Mr D Fish			Do not favour "mixed" housing.	The Borough Council is committed to providing sustainable, inclusive, mixed communities in line with national guidance (PPS3).
Dr E Bridson		3A/3D		This choice of options does not correspond to the choices offered.
Mr A Bateman	The Planning Bureau	3C/3J		As there is a more pressing need for affordable housing in rural areas and very few large sites come forward consideration is being given to a preferred option which will reduce the threshold for affordable housing to 5 units. Increasing the proportion to 40% with developer contributions on sites under the threshold is also being considered. This will be supported by further work into financial viability as part of the housing market assessment.
Mr G Irvin	Showmen's Guild	3A		Retaining the existing Local Plan policy is unlikely to meet demonstrated need for affordable housing in rural areas. As there is a more pressing need for affordable housing in rural areas and very few large sites come forward consideration is being given to a preferred option which will reduce the threshold for affordable housing to 5 units. Increasing the proportion to 40% with developer contributions on sites under the threshold is also being considered. This will be supported by further work into financial viability as part of the housing
Mr D Harman	Mansard Country Homes Ltd	3A		
Mrs J Davis	The Rural Housing Trust	3A		

Name	Organisation	Option Selected	Additional Comments	Officer Response
				market assessment.
Mr Couzens		3B/3G	<p>Sites of 1 hectare or larger are unlikely to occur within rural settlements, and a larger site policy would be ineffective.</p> <p>Opportunity may arise on smaller sites within the settlement boundaries or adjacent. Additional developer contributions are important in relation to the provision of 100% AH Rural Exception Sites.</p>	<p>Agree. As there is a more pressing need for affordable housing in rural areas and very few large sites come forward consideration is being given to a preferred option which will reduce the threshold for affordable housing to 5 units. Increasing the proportion to 40% with developer contributions on sites under the threshold is also being considered. This will be supported by further work into financial viability as part of the housing market assessment.</p> <p>Rural Exception Sites are addressed in Options 5A-5E.</p>
Mr I Sowerby	Bell Cornwall	3B/3D	<p>Deepcut should be included in the list of rural settlements, rather than as 'an urban area', as it is an identifiable separate settlement of less than 3000 inhabitants surrounded by countryside. This re-designation would accord with PPS3 and the associated guidance note 'Delivering Affordable Housing' (Nov 2006).</p>	<p>Deepcut has previously been treated as an urban settlement and has recently accommodated a large housing allocation on surplus Ministry of Defence land. Land use in Deepcut will continue to be dominated by Ministry of Defence Barracks for the foreseeable future.</p> <p>Deepcut has a local supermarket and bus services which are regular but infrequent. However, the local school has just closed, there is no bank or doctors surgery and, the local shopping parade offers a limited range of shops and requires environmental improvement.</p> <p>Whilst Deepcut will continue to be treated as urban (as large sites have previously come forward), it is considered that existing services have a limited ability to support new development.</p>
Christian Leigh	Leigh & Glennie Ltd	3C/30	<p>Small dwellings in rural areas are needed and should be encouraged as widely as possible. Affordable rural housing in the countryside is needed – not just within settlements but to meet</p>	<p>The provision of small dwellings is addressed by Options 8A-8G.</p> <p>As there is a more pressing need for affordable</p>

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			wider need for a range of low-cost housing.	<p>housing in rural areas and very few large sites come forward consideration is being given to a preferred option which will reduce the threshold for affordable housing to 5 units. Increasing the proportion to 40% with developer contributions on sites under the threshold is also being considered. This will be supported by further work into financial viability as part of the housing market assessment.</p> <p>Rural Exception Sites are addressed in Options 5A-5E.</p>
Mr L Spiller	Frimhurst Farm Industrial Centre Director	3A		<p>Retaining the existing Local Plan policy is unlikely to meet demonstrated need for affordable housing in rural areas. As there is a more pressing need for affordable housing in rural areas and very few large sites come forward consideration is being given to a preferred option which will reduce the threshold for affordable housing to 5 units. Increasing the proportion to 40% with developer contributions on sites under the threshold is also being considered. This will be supported by further work into financial viability as part of the housing market assessment.</p>
Mr J Cheston	GOSE		This is a local decision.	<p>Noted. As there is a more pressing need for affordable housing in rural areas and very few large sites come forward consideration is being given to a preferred option which will reduce the threshold for affordable housing to 5 units. Increasing the proportion to 40% with developer contributions on sites under the threshold is also being considered. This will be supported by further work into financial viability as part of the housing market assessment.</p>
Mr T Wells	Chairman of Surrey Heath Tenants Federation	3C/3O	All social rented houses.	<p>As there is a more pressing need for affordable housing in rural areas and very few large sites come forward consideration is being given to a</p>

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				<p>preferred option which will reduce the threshold for affordable housing to 5 units. Increasing the proportion to 40% with developer contributions on sites under the threshold is also being considered. This will be supported by further work into financial viability as part of the housing market assessment.</p> <p>Options 4A to 4D address the issue of the mix of affordable housing.</p>
Mr T Price	Windlesham Parish Council	3B/3G		<p>As there is a more pressing need for affordable housing in rural areas and very few large sites come forward consideration is being given to a preferred option which will reduce the threshold for affordable housing to 5 units. Increasing the proportion to 40% with developer contributions on sites under the threshold is also being considered. This will be supported by further work into financial viability as part of the housing market assessment.</p>
Mr R Evans	Surrey County Council	3C/3O	<p>In line with the approach adopted in rural areas in other Surrey Districts, i.e. a lower threshold than in urban areas. We support.</p> <p>In terms of the proportion of affordable housing: <i>Option 3O</i> – in line with the requirement in urban areas. We also support.</p>	<p>Support noted.</p> <p>As there is a more pressing need for affordable housing in rural areas and very few large sites come forward consideration is being given to a preferred option which will reduce the threshold for affordable housing to 5 units. Increasing the proportion to 40% with developer contributions on sites under the threshold is also being considered. This will be supported by further work into financial viability as part of the housing market assessment.</p> <p>Although PPS3 does not specifically mention setting area thresholds we consider that there is a specific local need for this to be included within an affordable housing policy. Due to the character of the some parts of the Borough, setting an area threshold will mean that lower density sites will be</p>

Name	Organisation	Option Selected	Additional Comments	Officer Response
				required to provide affordable housing on-site. This would also help to provide larger family size affordable homes for which there is a specific local need.

Section 4 – The Mix of Affordable Housing on Qualifying Sites

Possible Options:

4A – Continue to negotiate the mix of affordable dwelling types required on a case-by-case basis.

4B – Require 70% of units to be social rented with the remainder being other forms of subsidised housing.

4C – Require 60% of units to be social rented with the remainder being other forms of subsidised housing.

4D – Require 50% of units to be social rented with the remainder being other forms of subsidised housing.

Name	Organisation	Option Selected	Additional Comments	Officer Response
Cllr Mrs Pinder	Surrey Heath Borough Council	4D	It wasn't until this point that I realised that the affordable included key workers and low cost to buy. I answered the first question urban and rural incorrectly and had to alter them. I hope other people didn't get it wrong and not realise.	The preferred option will make it clear what constitutes affordable housing. Consideration is being given to requiring 70% of units provided to be social rented due to the high level of demand for this type of accommodation.
Mr J Russell		4A		Consideration is being given to requiring 70% of units provided to be social rented with the remaining being other forms of subsidised housing. This is in accordance with national guidance which stipulates that Local Development Documents should set separate targets for social-rented and intermediate affordable housing and in response to a local need for social-rented accommodation.
Dr E Bridson		4A		
Mr A Bateman	The Planning Bureau	4A		
Mr G Irvin	Showmen's Guild	4A		
Mr D Harman	Mansard Country Homes Ltd	4A		
Mr Couzens		4C	The options refer only to the social rented/subsidised mix. A mix of various types of accommodation is not considered. AH in new development has taken the form of flatted accommodation of up to 2 bedrooms. Family housing is also necessary. AH should form an integral part of residential development and reflect the 'open market' mix i.e. housing with houses and flats with flats. Mixed development should be in matching proportions.	Consideration is being given to requiring 70% of units provided to be social rented with the remaining being other forms of subsidised housing. This is in accordance with national guidance which stipulates that Local Development Documents should set separate targets for social-rented and intermediate affordable housing and in response to a local need for social-rented accommodation. Agreed. The preferred options paper will include

				an option which sets targets for the type and size of affordable housing in line with national guidance (PPS3) and the Housing Market Assessment will provide further guidance on this.
Mr I Sowerby	Bell Cornwall	4A	This will allow site-specific factors to be properly taken into account.	Consideration is being given to requiring 70% of units provided to be social rented. This is in accordance with national guidance which stipulates that Local Development Documents should set separate targets for social-rented and intermediate affordable housing and in response to a local need for social-rented accommodation. The need for this type of accommodation will be monitored and policies altered if required.
Mr D V Chesneau	The Camberley Society	4A	We believe that flexibility to meet changes in needs is important.	
Christian Leigh	Leigh & Glennie Ltd	4B	There is a need to maximise the amount of social rented housing, particularly in rural and countryside areas.	Consideration is being given to requiring 70% of units provided to be social rented due to the high level of demand for this type of accommodation.
Mr L Spiller	Frimhurst Farm Industrial Centre Director	4D		Consideration is being given to requiring 70% of units provided to be social rented due to the high level of demand for this type of accommodation.
Mr J Cheston	GOSE		This is a local decision.	Noted.
Mr T Wells	Chairman of Surrey Heath Tenants Federation	4D	Social rented housing.	Consideration is being given to requiring 70% of units provided to be social rented due to the high level of demand for this type of accommodation.
Mr T Price	Windlesham Parish Council	4A		Consideration is being given to requiring 70% of units provided to be social rented. This is in accordance with national guidance which stipulates that Local Development Documents should set separate targets for social-rented and intermediate affordable housing and in response to a local need for social-rented accommodation.
Mr A Ransome	Fairview New Homes Ltd	4A	Objects to the remaining options which require a set proportion of affordable dwellings being social rented. FNH consider that it would be unjustifiable to stipulate a certain mix of affordable housing sizes and that these should be negotiated on a site	Consideration is being given to requiring 70% of units provided to be social rented. This is in accordance with national guidance which stipulates that Local Development Documents should set separate targets for social-rented and intermediate

			by sites basis taking into consideration issues such as those relating to the sites location and surrounding contexts, the site constraints and the viability of the scheme.	affordable housing and in response to a local need for social-rented accommodation.
Mr R Evans	Surrey County Council		<p>PPS3 requires the LDF to set proportions for the provision of social rented and intermediate housing.</p> <p>The actual proportions for each should be determined in light of the results of the ongoing update to the Housing Needs Survey. We therefore cannot support an option at this stage.</p> <p>The proportions eventually selected should be expressed as an overall target for the Borough. The LDF should identify specific proportions for identified sites, but for windfalls, the Borough-wide targets should be guidelines, with the actual amount on each site to be determined on a case by case basis.</p>	<p>Agreed.</p> <p>Agreed. The preferred option will be developed in light of the Housing Needs Survey update (2006) and further discussions with the Council's Housing Department.</p> <p>The Borough Council believes that setting site targets rather than a Borough-wide target will provide a more robust way of providing different types of affordable housing. Furthermore, PPS3 does not specifically state whether overall or site-by-site targets should be set.</p>

Section 5 – The Role of Rural Exception Sites

Possible Options:

5A – Have no policy relating to Rural Exception Sites.

5B – Include a policy allowing for development of Rural Exception Sites adjoining all rural settlements.

5C – Include a policy allowing for development of Rural Exception sites anywhere in rural areas.

5D – Include a policy allowing for development of Rural Exception Sites adjoining all rural settlements and identify and allocate specific sites where possible.

5E – Include a policy allowing for development of Rural Exception Sites anywhere in rural areas and identify and allocate specific sites where possible.

Name	Organisation	Option Selected	Additional Comments	Officer Response
Cllr Mrs Pinder	Surrey Heath Borough Council	5E		Consideration will be given to a preferred option which will allow for the development and allocation of Rural Exception Sites in line with sustainability criteria.
Mr J Russell		5D		
Dr E Bridson		5D		
Mr A Bateman	The Planning Bureau	5A		It is considered in line with PPS3 that Rural Exception Sites form an important part of delivering affordable housing in rural areas. Due to the limited opportunity for affordable housing in rural settlements and need for this type of accommodation consideration will be given to a preferred option which will allow for the development and allocation of Rural Exception Sites in line with sustainability criteria.
Mr G Irvin	Showmen's Guild	5A		
Mr D Harman	Mansard Country Homes Ltd	5E		Consideration will be given to a preferred option which will allow for the development and allocation of Rural Exception Sites in line with sustainability criteria.
Mr Couzens		5D	Sites should be small (up to 0.5 hectares) and immediately adjoining the existing settlement boundary, thus preserving local characteristics, forming a natural extension in order to prevent subsequent 'infilling' sites to be used for 100% A.H.	Consideration will be given to a preferred option which will allow for the development and allocation of Rural Exception Sites in line with sustainability criteria. The Borough Council does not intend to set a

Name	Organisation	Option Selected	Additional Comments	Officer Response
				maximum site size threshold for rural exception sites as it wishes to support the development of these sites where needed and in sustainable locations.
Mr I Sowerby	Bell Cornwall	5C	This will allow the consideration of suitable brownfield sites in the rural parts of the Borough, even if not adjoining the settlement boundary, thereby increasing the potential supply of affordable housing in rural areas.	Consideration will be given to a preferred option which will allow for the development and allocation of Rural Exception Sites in line with sustainability criteria.
Mr D V Chesneau	The Camberley Society	5E	As the interests of the Society primarily relate to Camberley, we should probably not answer this question on principle. However, we can see no justification for the council having NO policy. On balance the best policy is probably to accept that Exception Sites could be 'anywhere', but to go further and identify specific sites after consultation with those affected.	
Christian Leigh	Leigh & Glennie Ltd	5E	The great need for affordable housing in rural/countryside areas means a rural exception policy is essential for Surrey Heath. The need for such housing is not just simply on the edge of settlements but throughout the countryside - that form development can help sustain local jobs and services. Specific allocations of sites are necessary to provide certainty on rural housing provision for the Council, residents, social landlords and potential developers.	
Mr L Spiller	Frimhurst Farm Industrial Centre Director	5E		It is considered in line with PPS3 that Rural Exception Sites form an important part of delivering affordable housing in rural areas. Due to the
Mr T Wells	Chairman of Surrey Heath Tenants Federation		No developments on rural exception sites.	

Name	Organisation	Option Selected	Additional Comments	Officer Response
				limited opportunity for affordable housing in rural settlements and need for this type of accommodation consideration will be given to a preferred option which will allow for the development and allocation of Rural Exception Sites in line with sustainability criteria.
Mr T Price	Windlesham Parish Council	5D	Rural Exception sites should be planned and identified and form an integral part of established communities.	Noted. This issue will be addressed within the supporting text to the preferred option.
Mr R Evans	Surrey County Council	5D	PPS3 requires the adoption of policies for rural exceptions sites. We support <i>Option 5D</i> , but the wording should be amended to allow for exceptions on sites well-related to rural settlements, rather than simply adjoining. We would support an amended approach.	Agreed. The Borough Council considers that the term 'well-related' is too vague and open to interpretation and therefore proposes that a preferred option will refer to rural exception sites 'adjoining' existing settlements.
Mrs J Davis	The Rural Housing Trust	5B		Consideration will be given to a preferred option which will allow for the development and allocation of Rural Exception Sites in line with sustainability criteria. The allocation of sites will hopefully aid their development.

Section 6 – Provision for Older and Disabled People

Possible Options:

6A – Continue to seek the provision of units for older persons and/or people with disabilities on sites of 25 or more units

6B – Make no requirement for units for older people or people with disabilities.

6C – Require affordable housing for older people and people with disabilities on sites of 15 net units or more and/or on sites of 0.5 hectares or larger based on a demonstrated need.

6D – Require a commuted payment towards affordable units for older people and people with disabilities on sites of 15 net units or more and/or on sites of 0.5 hectares or larger.

Name	Organisation	Option Selected	Additional Comments	Officer Response
Cllr Mrs Pinder	Surrey Heath Borough Council	6D		<p>The Draft Older and Disabled Persons Housing Needs Survey does not identify a high level of need for older and disabled accommodation. Therefore a policy requiring such a provision on large developments/ developer contributions could not be justified.</p> <p>The private market is currently supplying a large quantity of older and disabled person's accommodation. Specialist affordable housing will be provided through the preferred policy option (4A – 4D) which relates to the mix of affordable housing for those people whose housing needs cannot be met by the private market.</p>
Mr J Russell		6C		
Mr D Fish		6C		
Dr E Bridson		6D		
Mr A Bateman	The Planning Bureau	6D	Exempt from A H contributions for builders of Elderly Housing.	<p>The Draft Older and Disabled Persons Housing Needs Survey does not identify a high level of need for older and disabled accommodation. Therefore a policy requiring such a provision on large developments/ developer contributions could not be justified.</p> <p>The private market is currently supplying a large quantity of older and disabled person's accommodation. Specialist affordable housing will be provided through the preferred policy option (4A – 4D) which relates to the mix of affordable</p>

				<p>housing for those people whose housing needs cannot be met by the private market.</p> <p>In light of a letter received in from GOSE in February 2006 to all southeast local authorities, all sites over the adopted threshold should make a contribution to affordable housing including sheltered schemes.</p>
Mr G Irvin	Showmen's Guild	6C		<p>The Draft Older and Disabled Persons Housing Needs Survey does not identify a high level of need for older and disabled accommodation. Therefore a policy requiring such a provision on large developments/ developer contributions could not be justified.</p> <p>The private market is currently supplying a large quantity of older and disabled person's accommodation. Specialist affordable housing will be provided through the preferred policy option (4A – 4D) which relates to the mix of affordable housing for those people whose housing needs cannot be met by the private market.</p>
Mr D Harman	Mansard Country Homes Ltd	6A		
Mr Couzens		6A	<p>Policies should stress the importance of provision on appropriate central sites with good transport and social facilities. Commuted payments may only be acceptable for less appropriate locations.</p>	<p>Agreed.</p> <p>The Draft Older and Disabled Persons Housing Needs Survey does not identify a high level of need for older and disabled accommodation. Therefore a policy requiring such a provision on large developments/ developer contributions could not be justified.</p> <p>The private market is currently supplying a large quantity of older and disabled person's accommodation. Specialist affordable housing will be provided through the preferred policy option (4A – 4D) which relates to the mix of affordable housing for those people whose housing needs cannot be met by the private market.</p>
Mr I Sowerby	Bell Cornwall	6A		<p>The Draft Older and Disabled Persons Housing</p>

				<p>Needs Survey does not identify a high level of need for older and disabled accommodation. Therefore a policy requiring such a provision on large developments/ developer contributions could not be justified.</p> <p>The private market is currently supplying a large quantity of older and disabled person's accommodation. Specialist affordable housing will be provided through the preferred policy option (4A – 4D) which relates to the mix of affordable housing for those people whose housing needs cannot be met by the private market.</p>
Mr D V Chesneau	The Camberley Society	6D	<p>Our support for option 6D is primarily because we believe that commuted payments give greater flexibility in the location of housing for older and disabled people. (We do not reject the idea of housing on-site - it could still be an option within a commuted payment regime.) However, we do not know whether imposing the requirement on sites of greater than 15 net units or 0.5 hectares would be appropriate to satisfy the demand, so we take a neutral stance on this aspect of the stated option.</p>	<p>The Draft Older and Disabled Persons Housing Needs Survey does not identify a high level of need for older and disabled accommodation. Therefore a policy requiring such a provision on large developments/ developer contributions could not be justified.</p> <p>The private market is currently supplying a large quantity of older and disabled person's accommodation. Specialist affordable housing will be provided through the preferred policy option (4A – 4D) which relates to the mix of affordable housing for those people whose housing needs cannot be met by the private market.</p>
Mr L Spiller	Frimhurst Farm Industrial Centre Director	6A		<p>The private market is currently supplying a large quantity of older and disabled person's accommodation. Specialist affordable housing will be provided through the preferred policy option (4A – 4D) which relates to the mix of affordable housing for those people whose housing needs cannot be met by the private market.</p>
Mr T Wells	Chairman of Surrey Heath Tenants Federation	6C	<p>More development but not private developments</p>	<p>The Draft Older and Disabled Persons Housing Needs Survey does not identify a high level of need for older and disabled accommodation. Therefore a policy requiring such a provision on large developments/ developer contributions could not be justified.</p> <p>The private market is currently supplying a large quantity of older and disabled person's accommodation. Specialist affordable housing will be provided through the preferred policy option (4A</p>

				<p>– 4D) which relates to the mix of affordable housing for those people whose housing needs cannot be met by the private market.</p> <p>In light of a letter received in from GOSE in February 2006 to all southeast local authorities, all sites over the adopted threshold should make a contribution to affordable housing including sheltered schemes.</p>
Mr T Price	Windlesham Parish Council	6D		<p>The Draft Older and Disabled Persons Housing Needs Survey does not identify a high level of need for older and disabled accommodation. Therefore a policy requiring such a provision on large developments/ developer contributions could not be justified.</p> <p>The private market is currently supplying a large quantity of older and disabled person's accommodation. Specialist affordable housing will be provided through the preferred policy option (4A – 4D) which relates to the mix of affordable housing for those people whose housing needs cannot be met by the private market.</p>
Mr R Evans	Surrey County Council	6C	<p>We support <i>Option 6C</i> to bring provision into line with that for affordable housing generally. The LDF will also need to consider provision for those older and disabled people seeking specialist accommodation on the open market.</p>	

Section 7 – Provision for Gypsies, Travellers and Travelling Showpeople

Possible Options:

7A – Continue with existing Local Plan Policy whereby sites for Gypsy and Traveller accommodation has not be allocated and whereby proposals for new Gypsy sites and extensions to existing Gypsy sites will pay regard to set criteria.

7B – Enable the allocation of sites for Gypsies, Travellers and Travelling Showpeople in the Site Allocations DPD or Housing Needs DPD provided that a need is demonstrated through the Gypsies and Travellers Needs Assessment. Include criteria based policy.

Name	Organisation	Option Selected	Additional Comments	Officer Response
Cllr Mrs Pinder	Surrey Heath Borough Council	7B		Agreed. The preferred option will enable the allocation of sites for Gypsies, Travellers and Travelling Showpeople in the Development Site Allocations DPD provided that a need is demonstrated through the Gypsies and Travellers Needs Assessment. The preferred option will also include criteria for allocating sites and assessing planning applications.
Mr J Russell		7B	Option 7A would appear at odds with the requirements of Circular 01/2006. But 7B seems to have a management mechanism more in accord with government advice while still allowing determination of need.	
Mr D Fish		7B		
Dr E Bridson		7A		Circular 01/06 requires local authorities to allocate sites for Gypsies, Travellers and Travelling Showpeople provided that a need is demonstrated through the Gypsies and Travellers Needs Assessment. The preferred option will enable this allocation and will also include criteria for allocating sites and assessing planning applications.
Mr A Bateman	The Planning Bureau	7A		
Mr G Irvin	Showmen's Guild	7B	<p>We welcome the recognition of the specific needs of Travelling Showpeople.</p> <p>Additional Comments were submitted after the Travelling Showpeople Consultation Paper was made available – <i>we hope that new government guidelines on Travelling Showpeople, out for consultation at this time, will form the basis for future policy development, but welcome the inclusion of Showpeople in the present exercise.</i></p>	The Borough Council confirm that the preferred option will take full account of new government guidelines on Travelling Showpeople currently out for consultation.
Mr D Harman	Mansard Country	7A		Circular 01/06 requires local authorities to allocate

Name	Organisation	Option Selected	Additional Comments	Officer Response
	Homes Ltd			sites for Gypsies, Travellers and Travelling Showpeople provided that a need is demonstrated through the Gypsies and Travellers Needs Assessment. The preferred option will enable this allocation and will also include criteria for allocating sites and assessing planning applications.
Mr S Staines	Friends, Families and Travellers	7B	<p>Circular 01/2006 makes it clear that the number of pitches set out in the RSS must be translated into site specific allocations in one of the local planning authorities DPDs that form part of the LDF (para 30). Para. 33 includes 'local authorities must allocate sufficient sites for gypsies and travellers ... in site allocations DPDs. Criteria must not be used as an alternative to site allocations where there is an identified need for pitches'.</p> <p>Whilst the results of the partial revisions of the SE Plan, which will allocate district pitch requirements for sites, are awaited which this DPD will have to be conformable with, there already exists evidence of need within the Borough.</p> <p>In January 2006 there were 39 caravans on the available RSL sites and 10 caravans on unauthorised developments which were 'tolerated'. Surrey Heath has a history of unauthorised development which can be held to be evidence of need.</p> <p>In any event the recently published interim report on 'Research to Support the Preparation of RSS Reviews on Gypsies and Travellers by Regional Bodies' (Dec 2006) Birmingham, Salford and Sheffield Hallam Universities, provides a requirements formula which if applied to the Jan 06 situation in Surrey Heath indicates a requirement for 15 pitches. The same formula applied to the</p>	<p>Agreed. The preferred option will enable the allocation of sites for Gypsies, Travellers and Travelling Showpeople in the Development Site Allocations DPD provided that a need is demonstrated through the Gypsies and Travellers Needs Assessment. Criteria will be included to help allocate sites and assess planning applications.</p> <p>The Gypsies and Travellers Needs Assessment will clarify the need for accommodation within the Borough.</p> <p>Whilst unauthorised encampments can provide an indication of possible need the Gypsies and Travellers Needs Assessment will clarify the need for accommodation within the Borough. This takes into consideration unauthorised encampments present at the time of the assessment.</p> <p>This report has now been finalised to form 'Preparing RSS review of Gypsies and Travellers by Regional Planning Bodies' (March 2007). The Borough Council is currently reviewing this document which will inform any additional work required in order to submit final pitch numbers to SEERA.</p>

Name	Organisation	Option Selected	Additional Comments	Officer Response
			Jan 04 situation indicates a requirement for 51 pitches. Hence there would seem to be a proven need within the Borough which will require site allocation to meet it. Therefore, on this basis, site allocations will have to be made in conformity with Circular 01/06.	
Mr Couzens		7B	Site selection criteria: Close to main/distributor roads, screened location, not more than 1 hectare in area, outside rural settlements (prefer by/on carefully selected M.O.D land i.e. disused depots, yards or other small facilities).	Agreed. The preferred option will enable the allocation of sites for Gypsies, Travellers and Travelling Showpeople in the Development Site Allocations DPD provided that a need is demonstrated through the Gypsies and Travellers Needs Assessment. The preferred option will also include criteria for allocating sites and assessing planning applications.
Mr L Spiller	Frimhurst Farm Industrial Centre Director	7B	Consider that there are many potential travellers using the Canal Network. The provision of a Narrow Boat residential marina might be able to be counted towards this allocation.	
Mr J Cheston	GOSE	7B	Option 7B is consistent with advice in Circular 01/2006.	
Mr T Wells	Chairman of Surrey Heath Tenants Federation	7A	The proviso I have on Gypsy and Travellers Sites are that they pay for social rented sites and their Council tax. Also they keep the sites clean and don't leave rubbish and fly-tipping. They should respect the sites and other people's homes and gardens, and live in harmony with all other people.	Circular 01/06 requires local authorities to allocate sites for Gypsies, Travellers and Travelling Showpeople provided that a need is demonstrated through the Gypsies and Travellers Needs Assessment. The preferred option will enable this allocation and will also include criteria for allocating sites and assessing planning applications.
Mr T Price	Windlesham Parish Council	7A		
Mr R Evans	Surrey County Council	7B	We support <i>Option 7B</i> , which is the acceptable approach under the legislation.	Agreed. The preferred option will enable the allocation of sites for Gypsies, Travellers and Travelling Showpeople in the Development Site Allocations DPD provided that a need is demonstrated through the Gypsies and Travellers

Name	Organisation	Option Selected	Additional Comments	Officer Response
				Needs Assessment. The preferred option will also include criteria for allocating sites and assessing planning applications.

Section 8 – Provision of Small Dwellings

Possible Options for Defining Small Dwellings

8A – Retain existing Local Plan definition of a small dwelling: “Single unit of residential accommodation which has a gross floorspace of 74 sqm (800 sq feet) or less excluding internal garages or outbuildings including conservatories and porches.”

8B – Using a definition relating to actual number of bedrooms: “*Single unit of residential accommodation with one or two bedrooms.*”

8C – Using a definition stating all flats will be seen as small dwellings.

Name	Organisation	Option Selected	Additional Comments	Officer Response
Cllr Mrs Pinder	Surrey Heath Borough Council	8C		Consideration will be given to a preferred policy option which sets a maximum gross floorspace for small dwellings. Option 8B/8C would allow all flats/ one or two bedroom units, regardless of size to be considered as small. This would be unlikely to meet the need for those seeking small dwellings either through choice or affordability (who do not qualify for affordable housing).
Mr J Russell		8B		
Mr D Fish		8B		
Dr E Bridson		8B		
Mr A Bateman	The Planning Bureau	8A		Agreed. Consideration will be given to a preferred policy option which sets a maximum gross floorspace for small dwellings.
Mr G Irvin	Showmen’s Guild	8B		Consideration will be given to a preferred policy option which sets a maximum gross floorspace for small dwellings. Option 8B/8C would allow all flats/ one or two bedroom units, regardless of size to be considered as small. This would be unlikely to meet the need for those seeking small dwellings either through choice or affordability (who do not qualify for affordable housing).
Mr D Harman	Mansard Country Homes Ltd	8A		Agreed. Consideration will be given to a preferred policy option which sets a maximum gross floorspace for small dwellings.

Mr Couzens		8B	<p>Options A – C as drafted will tend to produce all AH as flats. There is a necessity to provide small houses for family accommodation and opportunities should not be missed (see comments to section 4 above).</p> <p>Two definitions are required – a singles unit with one or two bedrooms which has a gross internal floorspace of up to 55 sqm (700 sqft), or, a single unit with three bedrooms which has a gross internal floorspace of up to 84 sqm (900 sqft).</p> <p>Gross internal areas are a true reflection of accommodation and exclude garages, outbuildings and conservatories.</p>	<p>The requirement for small dwellings on developments will apply to both private developments (where affordable housing is not required) and mixed sites. The Council recognises the need for family units and this is acknowledged within options 8D-8G.</p> <p>The Borough Council does not consider three bedroom units to be ‘small dwellings’.</p> <p>Agreed – with the exception of conservatories which will be considered within the calculation of total gross floorspace.</p>
Mr I Sowerby	Bell Cornwall	8B		<p>Consideration will be given to a preferred policy option which sets a maximum gross floorspace for small dwellings. Option 8B/8C would allow all flats/ one or two bedroom units, regardless of size to be considered as small. This would be unlikely to meet the need for those seeking small dwellings either through choice or affordability (who do not qualify for affordable housing).</p>
Mr D V Chesneau	The Camberley Society	8A	<p>Paragraph 12.3 states that the Local Plan requires some developments should include small dwellings. This, presumably, was based on the Local Plan definition of 'small dwelling'. To change the definition and yet retain the Local Plan requirement would be illogical.</p> <p>Of the three options presented, only option 8A is unambiguous. Option 8B could include dwellings with two vast bedrooms - not readily described as 'small'. Likewise, option 8C could include a large 'loft' flat - something that isn't 'small'.</p>	<p>Agreed. Consideration will be given to a preferred policy option which sets a maximum gross floorspace for small dwellings.</p>

Christian Leigh	Leigh & Glennie Ltd	8A		Agreed. Consideration will be given to a preferred policy option which sets a maximum gross floorspace for small dwellings.
Mr L Spiller	Frimhurst Farm Industrial Centre Director	8B		Consideration will be given to a preferred policy option which sets a maximum gross floorspace for small dwellings. Option 8B/8C would allow all flats/one or two bedroom units, regardless of size to be considered as small. This would be unlikely to meet the need for those seeking small dwellings either through choice or affordability (who do not qualify for affordable housing).
Mr T Wells	Chairman of Surrey Heath Tenants Federation	8C/8B		
Mr T Price	Windlesham Parish Council	8B		
Mr R Evans	Surrey County Council	8B	We support <i>Option 8B</i> . We consider that thresholds and proportions for new developments should be set in light of the findings of the Housing Needs Survey.	

Section 8 – Provision of Small Dwellings

Possible Options for Providing Small Dwellings

8D – Continue to require small dwellings on sites of 10 or more units at a proportion of 40% and continue to retain small dwellings in rural areas.

8E – Require small dwellings on sites of 10 or more units at a proportion of 45% and continue to retain small dwellings in rural areas.

8F – Require small dwellings of 10 or more units at a proportion of 50% and continue to retain small dwellings in rural areas.

8G – Require small dwellings on sites of 10 or more units at a proportion of 55% and continue to retain small dwellings in rural areas.

Name	Organisation	Option Selected	Additional Comments	Officer Response
Cllr Mrs Pinder	Surrey Heath Borough Council	8G		Due to the emphasis on the provision for family sized accommodation within PPS3 the preferred policy option will seek a continuation of 40% of units to be in the form of small dwellings on sites of 10 or more units across the Borough. Small dwellings will also be retained in rural areas due to the lack of larger sites which will accommodate 10 or more units coming forward.
Mr J Russell		8F	Without any figures to work with, it would seem that 8F would assist in rectifying the imbalance that exists within Surrey Heath and also help reflect the increased formation of smaller households.	
Mr D Fish		8D		
Dr E Bridson		8D		
Mr A Bateman	The Planning Bureau	8D		
Mr D Harman	Mansard Country Homes Ltd	8D		
Mr Couzens		8F	Selection refers to developer sites and not rural exception sites devoted entirely to A.H.	
Christian Leigh	Leigh & Glennie Ltd	8G	Small dwellings are vital for the Borough, particularly in rural areas. They should be encouraged wherever possible.	
Mr L Spiller	Frimhurst Farm Industrial Centre Director	8G	We need a period to address the shortage. Then change back to 8D.	
Mr T Wells	Chairman of Surrey Heath Tenants	8G		

Name	Organisation	Option Selected	Additional Comments	Officer Response
	Federation			
Mr T Price	Windlesham Parish Council	8E		
Mr A Ransome	Fairview New Homes Ltd		<p>In terms of specifying dwelling mix, FNH consider that local planning authorities should not have a significant influence on this important commercial issue. The particular objection that FNH has relates to the potential control of the type and size of private housing.</p> <p>FNH believes the Council should not be in a position to impose a level of restriction on housing development that goes well beyond normal responsibilities of planning and the intentions of the original Town & Country Planning Act. Such an approach would be highly likely to adversely impact on the provision of housing in this country. It is our view, and that of FNH, that policies relating to dwelling mix are wholly unacceptable, unjustified and impose an unprecedented level of control on the house building industry. It is an unreasonable imposition for the following reasons:</p> <ol style="list-style-type: none"> 1. It takes away the ability of the private sector to respond to market demands at any one given time. PPS3 states that developers should bring forward proposals for market housing which reflects demand and profile of households requiring market housing. 2. If sizes and types of housing are specifically defined in a policy in an LDD 	<p>Objection noted.</p> <p>Due to the emphasis on the provision for family sized accommodation within PPS3 the preferred policy option will seek a continuation of 40% of units to be in the form of small dwellings on sites of 10 or more units across the Borough. Small dwellings will also be retained in rural areas due to the lack of larger sites which will accommodate 10 or more units coming forward. The Council believes that there is an adequate degree of flexibility built into this option.</p> <p>PPS3 seeks to achieve a wide choice of high quality homes, both affordable and market housing, to address the requirements of the community. The Borough Council has identified a specific need for small dwellings which policy seeks to address.</p> <p>The preferred option will be reflective of the housing market assessment which will be regularly</p>

Name	Organisation	Option Selected	Additional Comments	Officer Response
			<p>there is limited scope to react or respond quickly to changes in the market thus taking away the ability of house builders to assess the viability of individual schemes and to establish the appropriate mix to make developments viable. This completely undermines the application of the economics of supply and demand. This also hands complex decisions about development surveying and environmental analysis to local planning authorities who are not in the best position to make such decisions.</p> <p>FNH would therefore strongly request that an approach which specifies dwelling mix is not adopted and that it is made clear that there will always be an appropriate level of flexibility for house builders to best determine the appropriate requirements of a site based on market and commercial consideration having regard also to general planning policies and environmental considerations. Therefore dwelling mix should be negotiated on a site by site basis.</p> <p>On consideration of the representation we hope that your Council takes the appropriate steps to satisfy the above objection.</p>	<p>reviewed.</p>

General comments

Name	Organisation	Comments	Officer Responses
Mr A Ransome	Fairview New Homes Ltd	Fairview New Homes is the leading housebuilder who specialises in the provision of new housing on previously developed land to provide accommodation at the more affordable end of the market. They are therefore very familiar with the issues arising out of the redevelopment of previously developed land and the costs that can often be involved. They are also a major provider of affordable housing and therefore it is hoped that their views will be appropriately taken on board.	Noted.
Mrs M Pratt	Highways Agency	Has no comment to make at this time.	Noted.
Miss M Raison	Environment Agency	Has no comment to make at this time.	Noted.
Mr D V Chesneau	The Camberley Society	<p>The Introduction to the DPD points out that its aim is to: 'provide housing that meets the needs of ALL (our emphasis) sections of the community'. However, the body of the document makes very little reference to the needs of 'ordinary' people, and concentrates on affordable housing, and on specific sectors of the population. We feel that the needs of 'ordinary' people deserve more explicit attention.</p> <p>The Society is unwilling to answer many of the questions in the DPD. We suggest that this is the result of shortcomings in the paper rather than of ourselves. For example, consider Section 2 - Options for providing affordable housing. Paragraph 4.5 of the document implies that there are (was) an annual shortfall of 453 affordable units. Clearly, a key factor in choosing one of the seven stated options for providing affordable housing must be the extent to which the option would, or would not, overcome the shortfall. However, no such information is provided in the paper. To support an option that might exacerbate the shortfall - without our realising it – would be incompetent on our</p>	<p>Agreed. The introduction to the Housing Needs Preferred Options Paper will make greater reference to the housing needs of 'all' of the community. However, the introduction will explain the main aim of the DPD which is providing for those whose housing needs are not meet by the private market.</p> <p>The Housing Needs Options Paper should be read in parallel with the SA/SEA Progress Report which examines the implications of each of the Options in terms of socio-economic and environmental.</p>

		<p>part.</p> <p>In addition, each of the options throughout the DPD will have pros and cons, not least their impact on commercial viability as far as developers are concerned. As lay people, we are often not familiar with these pros and cons. However, the paper rarely, if ever, summarises them. Nor does the paper describe the experience (good or bad) in other parts of the UK - or further a field - in implementing the various options. We are left in ignorance.</p> <p>In view of the above comments, rather than provide 'near-random' answers too many of the questions posed in the DPD; we will restrict our response to just a few points.</p> <p>You also invite comments on the SE/SEA Progress Report.</p> <p>The Society's comments on the previous version still apply. It is extremely difficult to make any independent comprehensive review of the Report, because of the detail involved. However, we are concerned to see that two specific points that we made are not reflected in the latest text.</p> <p>1. We believe that the document mis-represents the relevant UK Statutory Instrument by saying that certain aspects of sustainable development MUST be considered.</p>	<p>The Housing Needs Options Paper should be read in parallel with the SA/SEA Progress Report which examines the implications of each of the Options in terms of socio-economic and environmental. Financial viability will be a key part of the preferred option policy and will be informed by the housing market assessment.</p> <p>Consideration will be given to including a summary of the SA/SEA comments on the selected preferred option within the Housing Needs Preferred Options Paper.</p> <p>The SA/SEA is a technical process which aims to ensure that sustainability issues are considered and fully integrated into the production of planning documents. For this reason, the content of the report comprises essentially technical information. However, to aid understanding and in accordance with government guidance a non-technical summary will be included within the SA/SEA Report that will accompany the Preferred Options Paper to be published in the summer.</p> <p>The Council notes that this issue was previously raised in response to the Camberley Town Centre SA/SEA Scoping Report and has now been raised in the response to the Housing Needs SA/SEA Progress Report. The Council acknowledges that this point has so far not been directly addressed within the reports and notes that in the recently published SA/SEA Progress Report for Camberley Town Centre AAP the 'Officer Response' does not directly address this point (Appendix 1). This is an oversight and the Council agrees that further versions of both reports should be amended to read "such as".</p>
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		<p>2. The suggestion on page 23 of the latest text that promoting access to the countryside and local biodiversity is a step towards sustainable development is largely incorrect. Unless access is solely on foot, it will require additional public or private transport, plus, in the latter case, the likely need to build more car parks. Moreover, as illustrated by the current SPA debate, it is more probable that wildlife will be disturbed and disrupted by the presence of human visitors, rather than protected. A more robust step towards sustainable development would be to promote access to local libraries, so that the public stays at home reading books.</p>	<p>In previous responses it has also been mentioned that it would be logical to address the SEA topics specifically throughout the reports. The importance of consistency and clarity throughout the reports is recognised. However, as noted in the ‘Officer Response’ to this point in Appendix 1 of the SA/SEA Progress Report for Camberley Town Centre AAP, the apparent discrepancy derives from the need to meet the requirements of both SEA and SA. SA requires a slightly wider scope than SEA and a greater number of topics are therefore used in other sections of the reports. The SEA topics are referred to throughout the reports in line with government guidance and to help demonstrate how the report addresses these issues and therefore the requirements of the SEA legislation.</p> <p>In response to this point, improved access in sustainability terms would encompass pedestrian, cycle and public transport access. To reflect this, the decision making criteria could be amended to read ‘Will it promote <u>sustainable</u> access to the countryside, open spaces and local biodiversity?’</p> <p>The point that encouraging access to these areas may lead to the disruption to wildlife is acknowledged. This can be reflected in Appendix 4 as a potential conflict between SA objective 7 and SA objectives 14, 15 and 17 relating to the protection of biodiversity and designated sites. The nature of SA objectives means that conflicts will exist between them and the assessment in Appendix 4 helps to identify these so that subsequent decisions are well based, and mitigation or alternatives can be considered. The assessment table can be amended to reflect this conflict in the SA reports for Camberley Town Centre AAP and Housing Needs DPD. Further consideration will be given to the possibility of amending it within the SA Report for the Core Strategy.</p>
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		As the latest text appears to have ignored our earlier comments completely, we wonder somewhat about the value of the consultation process.	The Borough Council welcomes all comments to the SA/SEA and apologises for this oversight.
Ms S Janota	SEERA	The Assembly has no comment to make relating to this document. However, we would take this opportunity to remind you that your development plan documents should be in general conformity with the current Regional Spatial Strategy (RPG9) and also take into account the emerging Draft South East Plan.	Noted.
Mr R Evans	Surrey County Council	We support the proposed approach of seeking affordable housing on site, through S.106 Agreements. We support the proposed flexible approach to Key Workers.	Support noted.