

View Response

Response #1231189

From [REDACTED]
[REDACTED]

Date Started: 20 Sep 2024 09:51. Last modified: 20 Sep 2024 09:53

Status Complete

Title Mr

First Name Mike

Last Name Riding

Organisation Chilton Frimley Ltd

Job Title Director

Address Line 1 [REDACTED]

Address Town [REDACTED]

Address County [REDACTED]

Address Post Code [REDACTED]

Which of the following categories best describes you?
Developer / Landowner

Which local areas of Surrey Heath are you specifically interested in?
All of Surrey Heath

Which topic areas are you specifically interested in?
Employment and Economy Housing

Visibility Unknown.

Introduction

This form has two parts:

Part A – Personal Details

Part B – Your representation(s). (Please be aware that this together with your name will be made publicly available)

Please fill in a separate form for each representation you wish to make.

To view Surrey Heath Borough Council's Privacy Statement, please visit our [website](#).

Please read the separate guidance notes found under "supporting documents" before completing and submitting this form.

Part A - Personal Details

Part A - Personal Details

1

First name

You must provide an answer to this question.

2

Last name

You must provide an answer to this question.

3

Job title (where relevant)

Director

4

Organisation (where relevant)

Chilton Frimley Ltd

5

Do you wish to be notified when the Pre-Submission Local Plan has been submitted to the Secretary of State for independent examination?

You must provide an answer to this question.

☒ Yes

☐ No

6

Do you wish to be notified when the independent examiner's recommendations are published?

You must provide an answer to this question.

☒ Yes

☐ No

7

Do you wish to be notified when the Local Plan has been adopted?

You must provide an answer to this question.

☒ Yes

☐ No

Please note

After completing Part A of this Online Response Form, please click "Save answers" below to ensure your information is submitted correctly.

Please note that your formal comments (known as representations) and your name will be made available on the Council's website. All other details in Part A of this form containing your personal details will not be shown.

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Part B - Representation

Your representation should cover all the evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8

What paragraph does your representation relate to? (E.g., "2.14")

«No response»

9

What policy does your representation relate to? (E.g., "SS1")

You must provide an answer to this question.

«No response»

10

What else does your representation relate to? (E.g., any other detail, such as "policies map", "table", "appendix", etc.)

To which part of the Pre-Submission Local Plan does this representation relate? You must include: (1) the paragraph number; (2) the policy; or, (3) any other detail, e.g., policies map, table, appendix, etc.

«No response»

11

Do you consider the Pre-Submission Local Plan to be legally compliant? (please refer to guidance notes)

You must provide an answer to this question.

- ☐ Yes
- ☐ No
- ☐ Don't know

12

Do you consider the Pre-Submission Local Plan to be sound? (please refer to guidance notes)

You must provide an answer to this question.

- ☐ Yes
- ☐ No
- ☐ Don't know

13

Do you consider that the Pre-Submission Local Plan complies with the Duty to Co-operate? (please refer to guidance notes)

You must provide an answer to this question.

- ☐ Yes
- ☐ No
- ☐ Don't know

14

Please give details of why you consider the Pre-Submission Local Plan to be legally compliant. Please be as precise as possible.

You must provide an answer to this question.

«No response»

15

Please give details of why you consider the Pre-Submission Local Plan is **not** legally compliant. Please be as precise as possible.

You must provide an answer to this question.

«No response»

16

Please give details of why you consider the Pre-Submission Local Plan to be sound. Please be as precise as possible.

You must provide an answer to this question.

«No response»

17

Please give details of why you consider the Pre-Submission Local Plan to be **not** sound. Please be as precise as possible.

You must provide an answer to this question.

«No response»

18

Please give details of why you consider the Pre-Submission Local Plan to be compliant with the Duty to Co-operate. Please be as precise as possible.

You must provide an answer to this question.

«No response»

19

Please give details of why you consider the Pre-Submission Local Plan to **not** be compliant with the Duty to Co-operate. Please be as precise as possible.

You must provide an answer to this question.

«No response»

20

Please set out what modification(s) you consider necessary to make the Pre-Submission Local Plan legally compliant, having regard to the matters you have identified.

(Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination)

You will need to say why each modification will make the Pre-Submission Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

You must provide an answer to this question.

«No response»

21

Please set out what modification(s) you consider necessary to make the Pre-Submission Local Plan sound, having regard to the matters you have identified.

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- ☐ Yes, I wish to participate at the oral examination.
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«No response»

End of representation

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View Response

Response #1231192

From [REDACTED]
[REDACTED]

Date Started: 20 Sep 2024 09:56. Last modified: 20 Sep 2024 10:59

Status Complete

Title Mr

First Name Mike

Last Name Riding

Organisation Chilton Frimley Ltd

Job Title Director

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☐ No

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8

What paragraph does your representation relate to? (E.g., "2.14")

Paras 1.9; 1.10; 2.5; 2.8; 2.9; 2.10; 2.12; 2.13; 2.22; 3.9

9

What policy does your representation relate to? (E.g., "SS1")

You must provide an answer to this question.

SS1

10

What else does your representation relate to? (E.g., any other detail, such as "policies map", "table", "appendix", etc.)

To which part of the Pre-Submission Local Plan does this representation relate? You must include: (1) the paragraph number; (2) the policy; or, (3) any other detail, e.g., policies map, table, appendix, etc.

Policy HA1, Appendix 2; Table 9; Policies Map; SLAA

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You must provide an answer to this question.

N/A

15

Please give details of why you consider the Pre-Submission Local Plan is **not** legally compliant. Please be as precise as possible.

You must provide an answer to this question.

On the 24th of June 2024, Surrey Heath Borough Council resolved to endorse the Pre-Submission Local Plan and delegated minor changes and formal submission. The revised NPPF (discussed in more detail in Q17) represents a major shift in the implications of how the Pre-Submission Local Plan would work even if adopted in its current format. More pertinently the changes required to make the Plan sound would also now represent a significant increase in housing requirement and additional allocations, far beyond what was endorsed and delegated by the Council in the June meeting.

In addition, submission of the Pre-Submission Local Plan to the Secretary of State for Examination would be in direct conflict with the accompanying Written Ministerial Statement which was published alongside the NPPF, and is a material consideration pertinent to the evolution of the New Local Plan. Again, highlighting the increasing requirement for new housing, noting that Surrey Heath is likely to see a 106% increase in its annual housing requirement (under the proposed reforms), from 320 to 658 dwellings per annum.

Whilst it is accepted that the revised NPPF is out for consultation (closing 24th Sep), given the timing of the two consultations there will be insufficient time to fully review and adequately assess the Pre-Submission responses and make any required amendments for Council to re-consider or for submission of the Pre-Submission Local Plan to the Secretary of State before the revised NPPF is fully endorsed.

16

Please give details of why you consider the Pre-Submission Local Plan to be sound. Please be as precise as possible.

You must provide an answer to this question.

N/A

17

Please give details of why you consider the Pre-Submission Local Plan to be **not** sound. Please be as precise as possible.

You must provide an answer to this question.

On 30 July, the new Government introduced its Planning Reform agenda. This included a Written Ministerial Statement, Draft NPPF and draft revised standard methodology for housing delivery.

These documents are also subject to consultation until the 24th September, however, the Labour party manifesto and the Written Ministerial Statement signal the new Government's firm agenda to deliver greater levels of growth.

It is noted that the revised standard methodology for Surrey Heath requires a significant increase in housing delivery per annum from 320 dwellings to 658 dwellings, against an actual current delivery of 389 dwellings per year. This represents a proposed increase of approximately 106%.

Moreover, this represents a doubling to the starting point that Surrey Heath needs to address as part of its plan-making process. The current Regulation 19 Local Plan that is subject to consultation is based on a housing requirement of 5,578 dwellings over the plan period (at an average of 293 dwellings a year). This is significantly below the levels of growth anticipated by the revised standard methodology.

It is further noted that the Council is aware that there are a range of alternative sites that are both readily available and capable of delivering additional growth opportunities in the district. This includes Pine Ridge which as recently confirmed is available for development within the plan period. We challenge that assumption and note that the 'snapshot' in time the SLAA represents appears not to have been revisited.

Due to the above, the Pre-Submission Local Plan does not meet the “tests of soundness” as set out in the NPPF, namely it is not “positively prepared”, “justified” nor is it “consistent with national policy”. Given the above, we would strongly urge the Council to delay its Local Plan process, review the newly emerging standard housing methodology and to reconsider the site selection methodology.

18

Please give details of why you consider the Pre-Submission Local Plan to be compliant with the Duty to Co-operate. Please be as precise as possible.

You must provide an answer to this question.

N/A

19

Please give details of why you consider the Pre-Submission Local Plan to **not** be compliant with the Duty to Co-operate. Please be as precise as possible.

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N/A

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You must provide an answer to this question.

The Council should adhere to the 30th of July Ministerial Statement and NPPF transitional arrangements and not submit their Pre-Submission Local Plan for examination. The Council should then prepare a new Pre-Submission Local Plan, along with an updated evidence base (in particular an updated SLAA) due to the significant increase in the requirement for additional housing land).

Any future amended or new Pre-Submission Local Plan would then require re-approval from Surrey Heath Council and re-consultation prior to submission to reflect the implications of the revised NPPF.

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You must provide an answer to this question.

We strongly urge the Council to not submit their Reg19 for examination and prepare a new Local Plan that is consistent with the 30th July Ministerial Statement and National Policy.

The draft NPPF sets out transitional arrangements at Annex 1, requiring Surrey Heath to not submit the current Reg19 and to create a new version that delivers significantly more housing.

Based on the new standard methodology and having regard to the Council's existing spatial strategy, the Council needs to find additional land to deliver a further 4-6,000 homes over the same plan period. A very different spatial strategy is required for Surrey Heath, and an immediate need to identify more land for residential development.

The change requires re-assessment of all land in Surrey Heath, and therefore an updated SLAA. There are suitable, available and achievable potential developments sites, in keeping with the existing spatial strategy and sat in sustainable locations outside of the Green Belt that should now be re-considered and allocated for mix used development including housing. In particular, Pine Ridge which was assessed in the SLAA, at that time, as being a site that "could comprise an area for search for future development either within or beyond the plan period, should availability be confirmed". The site was discounted as an allocation due to the author's availability concerns. We note that the SLAA appears to have not been reconsidered as a living document, and that the Council has not sought to check details since it was first produced, raising concerns as to the accuracy of information feeding into the site selection process.

Any Council concerns around the availability of Pine Ridge are now resolved, evidence of which can be submitted to the Council to demonstrate delivery within the plan period. Within this context and the council's previous recognition of the development potential of this land the site should now be considered suitable for housing allocation.

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You must provide an answer to this question.

The revised NPPF represents a significant shortfall in the proposed Pre-Submission Local Plan that, if pursued, would risk significant blockers to delivery not in keeping national guidance and policy.

End of representation

Thank you for answering the above questions and completing this representation.

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