

	Surrey Heath Borough Council Surrey Heath Local Plan (2019 – 2038) Main Modifications Consultation Response Form	Ref: (For official use only)
---	--	--

Please return:

By email: planning.consultation@surreyheath.gov.uk

OR

By post: Planning Policy and Conservation, Surrey Heath Borough Council, Surrey Heath House, Knoll Road, Camberley, Surrey GU15 3HD.

By 9th July 2026 at 12:00 noon

NO LATE REPRESENTATIONS WILL BE ACCEPTED

This form has two parts:

Part A – Personal Details- need only be completed once.

Part B – Your representation(s). **Please fill in a separate sheet for each representation you wish to make.**

Surrey Heath Borough Council's Privacy Statement is [here](#)

Background

The Surrey Heath Local Plan 2019-38 was submitted to the Secretary of State for examination in December 2024. Subsequent Examination in Public hearing sessions were held between 16th September 2025 and 8th December 2025.

As a result of the examination thus far, the Planning Inspector appointed to examine the Local Plan has recommended a number of Main Modifications to make the plan sound and legally compliant.

These are shown on the Schedule of Main Modifications that has been published for consultation. These have been subject to a further Sustainability Appraisal and Habitats Regulation Assessment.

The Main Modifications are proposed without prejudice to the Inspectors' final conclusions which will take account of all representations submitted in response to this consultation.

The Council will send responses to the consultation directly to the Inspector by the Council for review.

Part A

You must provide your contact details. We are unable to accept anonymous comments. The names of respondents and submitted comments will be submitted to the inspectors and published on the Council's examination website. Personal information such as telephone numbers, addresses, and email addresses will not be published.

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	Mr	
First Name	Stephen	
Last Name	Lapthorn	
Job Title (where relevant)	Committee member	
Organisation (where relevant)	Mytchett Community Association (MCA)	
Address Line 1	The Mytchett Centre	
Line 2		
Line 3		
Post Code		
Telephone Number		
E-mail Address		

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.

The Council cannot accept confidential comments as all representations must be publicly available.

Part B – Representations

Please note:

- Representations should only relate to Proposed Main Modifications, Map Changes or the associated addenda of the Sustainability Appraisal and/or Habitats Regulations Assessment, and not to other aspects of the Plan.
- This is not an opportunity to repeat or raise matters that were or could have been part of earlier representations or hearings on the submitted Plan.
- In your representation you should succinctly provide all the evidence and supporting information necessary to support your representation and your suggested modification(s).
- You should not assume that you will have a further opportunity to make submissions.
- Please use a separate sheet for each representation

Part B – Response 1 of 3

Name or Organisation:	The Mytchett Community Association (MCA)
-----------------------	--

3. To which Main Modification does this representation relate?

Main Modification Reference Number:	MM40 (Policy IN4: Community Facilities)
-------------------------------------	---

4. Do you consider the Main Modification is:

4.(1) Legally compliant
(delete as applicable)

Yes

4.(2) Sound
(delete as applicable)

Yes

5. Please give details of why you consider the Main Modification does not assist in achieving legal compliance or soundness or provide any other comments. Please be as precise as possible.

The MCA strongly supports MM40, particularly Part 2(b)(i), which now requires the Council to demonstrate a "lack of need" for a facility by "consulting with a range of community groups as potential future users". This modification is essential for the legal compliance and soundness of the plan as it ensures that established associations like the MCA are formally involved before any community land is considered for residential redevelopment. However, to be fully sound, the policy should clarify that for non-commercial community facilities, the "viability" criteria in Part 2(b)(ii) must account for the fact that these assets often rely on grants rather than commercial profit. A lack of current government funding should not be used as a proxy for "economic unviability" to justify the loss of the asset.

6. Please set out the change(s) to the Main Modification that you consider necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. You will need to say why each change will make the 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.

The MCA suggest that the supporting text at **Paragraph 5.49** be further clarified to state: *"In assessing the viability of non-commercial facilities, the Council will give significant weight to their social value and potential for future grant-funded improvements, regardless of current government funding status."*

7. Do you have any comments on the Sustainability Appraisal, Habitats Regulations Assessment or Policies Map changes in respect of this particular Main Modification?

Part B – Response 2 of 3

Name or Organisation:	The Mytchett Community Association (MCA)
-----------------------	--

3. To which Main Modification does this representation relate?

Main Modification Reference Number:	MM2 (Policy SS3a: Climate Change Mitigation) and MM60 (Policy DH8: Building Emission Standards)
-------------------------------------	---

4. Do you consider the Main Modification is:

4.(1) Legally compliant
(delete as applicable)

Yes

4.(2) Sound
(delete as applicable)

Yes

5. Please give details of why you consider the Main Modification does not assist in achieving legal compliance or soundness or provide any other comments. Please be as precise as possible.

The MCA **supports the inclusion of carbon offset payments** in **MM2 (Policy SS3a Part 1a)**. To make this policy effective and sound, the Council must provide a clear pathway for these funds to be directed toward **retrofitting existing community infrastructure**. **MM60 (Policy DH8)** correctly identifies that residential buildings are the largest source of emissions, but the Plan must also support non-residential community hubs in reaching net-zero. Community groups, which often operate without core funding, require access to these carbon offset payments to implement high-cost renewable solutions (e.g., ground-source heat pumps and PV) that go beyond simple maintenance.

6. Please set out the change(s) to the Main Modification that you consider necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. You will need to say why each change will make the 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.

The MCA suggests adding a clause to **Policy SS3a** or its supporting text stating: *"Carbon offset payments collected from developers will be made available via a transparent grant process for the retrofitting of existing community facilities to help achieve the Borough's net-zero 2050 trajectory."*

7. Do you have any comments on the Sustainability Appraisal, Habitats Regulations Assessment or Policies Map changes in respect of this particular Main Modification?

Part B – response 3 of 3

Name or Organisation:	The Mytchett Community Association (MCA)
-----------------------	--

3. To which Main Modification does this representation relate?

Main Modification Reference Number:	MM18 (Policy HA4: Mindenhurst, Deepcut)
-------------------------------------	---

4. Do you consider the Main Modification is:

4.(1) Legally compliant
(delete as applicable)

Yes

4.(2) Sound
(delete as applicable)

Yes

5. Please give details of why you consider the Main Modification does not assist in achieving legal compliance or soundness or provide any other comments. Please be as precise as possible.

The MCA **supports MM18**, which reinforces the requirement for the Mindenhurst development to provide "**funding for social, physical and community infrastructure**". The Mytchett Centre is a critical piece of infrastructure serving the Mytchett and Deepcut ward. As the population increases by 1,200+ dwellings, the demand on the Centre will grow. It is essential that the "phased delivery" of infrastructure mentioned in **MM18 Part 2(d)** includes capacity enhancements and low-carbon upgrades for **existing facilities** within the ward, rather than only focusing on new-builds on the Mindenhurst site itself

6. Please set out the change(s) to the Main Modification that you consider necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. You will need to say why each change will make the 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.

Clarify in **Policy HA4 Part 2(d)** or the supporting text that: *"Community infrastructure funding may be allocated to the enhancement and environmental upgrading of existing facilities within the Mytchett and Deepcut ward that serve the needs of the expanded population."*

7. Do you have any comments on the Sustainability Appraisal, Habitats Regulations Assessment or Policies Map changes in respect of this particular Main Modification?