

9 July 2026

Sent via email to: planning.consultation@surreyheath.gov.uk

The Savills logo, featuring the word "savills" in a red, lowercase, sans-serif font, positioned within a yellow rectangular background.

Charles Collins
Head of Office

E: [REDACTED]
T: [REDACTED]

244-246 High Street
Guildford
Surrey
GU1 3JF
savills.com

Dear Sir / Madam,

Response to the Submission Surrey Heath Local Plan (2019-2038) Schedule of Main Modifications

This representation is submitted on behalf of Vistry Group in respect of the Surrey Heath Local Plan Main Modifications consultation. It comments solely on the Main Modifications, following the interim letter of the Inspector in January 2026.

Vistry Group has been actively engaged throughout the preparation and Examination of the Local Plan, including submission of Regulation 19 representations and participation at the 2025 Examination hearings.

This representation should be read alongside our previous submissions including our Regulation 19 representations and associated appendices, and our Examination statements submitted in September 2025.

Vistry's position on the Main Modifications

Vistry notes the Inspector's interim findings, and is disappointed that no further contingency was required in the emerging Plan – notably with respect of housing and employment provision. Hence, Vistry is disappointed that Main Modifications do not provide a more fundamental correction of the emerging Plan.

Vistry maintains that the draft Local Plan is negatively prepared over a short onward plan period and does not meet its deliverable development needs, most notably housing, affordable housing, employment and Gypsy & Traveller needs. In contrast, Fairoaks Airport has been promoted to Surrey Heath Borough Council (SHBC) over a significant period of time with three potential development scenarios ranging from 1,000 and 1,800 dwellings with employment space and supporting infrastructure, and once formed a Garden Village proposal advocated by SHBC in 2016. The choice to make this necessary release/ amendment to the Green Belt remains, which has not been taken via the Main Modifications.

Vistry accepts, that owing to the transitional arrangements, the Plan is examined under the (less positive and ambitious) NPPF 2023. The limited scope of the proposed Main Modifications risks delaying delivery of housing and employment development. SHBC has a relatively poor track record of development delivery in Surrey, therefore, SHBC should release Fairoaks Airport from the Green Belt in order to allocate a sustainable development on land that forms an insignificant proportion of the wider Green Belt. This strategy is consistent with other local authorities that have been required to release Green Belt land, often in more significant quantities, for development needs. Therefore, objections are maintained on some of the Main Modifications.

Housing and Employment Requirements – Objection (MM1, MM25 and MM29)

Vistry notes that the Main Modifications consultation document does not propose to reduce or alter housing or employment requirements (to which Vistry would ordinarily make a representation). However, MM29 proposes to amend Policy ER1 so that it explicitly refers to "the provision of between 44,500sqm and 78,800sqm of floorspace for employment uses". Vistry object to **MM29** not only because the range of employment floorspace given is particularly wide and therefore uncertain, but also that this quantum of employment provision (identified via rolling forward existing allocations and vacant premises) will not meet the

future additional employment need of 19ha as evidenced within SHBC's evidence base. Vistry also object to **MM1**, which cross-refers to this identified employment provision proposed within Policy ER1.

Evidence demonstrates a minimum housing need of 321 dwellings per annum and a clear requirement for additional employment land. There is significant housing, affordable housing, and employment need in Surrey Heath. Although SHBC would have a 5YHLS on adoption of this Local Plan, it is likely that they will have a 5YHLS deficit before a new local plan is produced by West Surrey even if site allocations come forward as expected. A positively prepared Plan is therefore urgently required, as in reality, the unmet needs will pertain.

Vistry would also like to raise that **MM25** provides Policy H1 an inclusion of "35 Gypsy and Traveller pitches and 14 Travelling Showpeople plots for those meeting the planning definition which will be delivered over the plan period." (there appears also to be one allocation, of 5 plots – policy HA12/01). This creates an unmet need. Fair Oaks Airport could deliver 12 GTTS pitches, to contribute towards an identified need of 65 GTTS plots when considering households that do not meet the planning definition. This unmet need will have to be planned positively in the future.

Green Belt

The Main Modifications consultation document does not propose to release more land for development or fundamentally change the Green Belt strategy. Instead, the document proposes clarifications and tightening of policy concerning the Green Belt. Vistry does not support this approach and consider that it contributes to a plan which is not positively prepared. If any further main modifications are proposed to the spatial strategy, then a comprehensive Green Belt Review should be undertaken to justify the approach.

Vistry accepts that as no Main Modification is proposed, no representation on this specific point can be made.

Need for Immediate Plan Review

An immediate review of the Local Plan is required following its adoption later this year, which should (ideally) be secured via a new Local Plan policy. There is no Main Modification that imposes a policy requirement or mechanism that requires the Council undertake an early review of the Local Plan once it is adopted or imposes an implication on the housing requirement were this not to happen (such as MM1, for example). Other local authorities examined (and subsequently adopted) using a LHN number significantly lower than their actual housing need were required through a Local Plan policy to review the Local Plan within 12 months of adoption (i.e. Bedford Borough). As there is no such Local Plan policy requirement proposed here, SHBC Local Plan will be able to continue to use the lower 320 dwellings per annum figure for a further five years from the date of the Local Plan's adoption (subject to the transitional arrangements discussed below). This is ultimately an unintended consequence of the application of the transitional arrangements, however, the Main Modifications consultation ordinarily provides a final stage for such circumstances to be rectified.

Without such an intervention, the Plan will not fully meet needs or reflect updated national policy. SHBC announced on 25th June 2026 that it intends to commence plan-making under the new local plan-making system, however, a new local plan will not be adopted until April 2029 at the earliest, resulting in at least 2.5 years of delivery against the 'old' local housing need of 321 dwellings per annum.

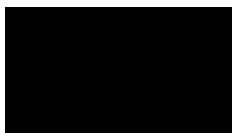
Conclusion

Fair Oaks remains a sustainable, deliverable mixed-use opportunity and will continue to be promoted under the new local plan making process – which should permit sustainable land release from the Green Belt. However, the Main Modifications do not go far enough to meet the needs arising from Surrey Heath now – which is a missed opportunity.

Vistry supports immediate plan review and continued engagement – and will shortly commence the promotion of the site via the immediate Local Plan review process.



Yours sincerely,



Charles Collins
Head of Office