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Local Plan Rep.

13.09.2024

Dear Planning Policy and Conservation Team

RE: Pre-Submission Surrey Heath Local Plan Reg. 19 Consultation

Abri is pleased to submit representations to this consultation. As one of the largest housing providers based in the south of England we are actively working to deliver more homes for those in need, in communities where everybody has the opportunity to belong, grow and thrive. We support the Council's ambitions to deliver a Local Plan that seeks to deliver more housing; our comments focus on how the proposed housing policies can best meet the borough's affordable housing needs.

Draft Policy H7: Affordable Housing

We broadly support this policy in setting appropriate targets and thresholds above which affordable housing will be required, informed by viability testing. The requirement in policy to deliver the first 25% of affordable housing as First Homes generally reflects national policy set out in the Planning Practice Guidance, however since the publication of this draft local plan the Government has consulted on plans to remove this requirement.

Chapter 6 of the Proposed Reforms to the NPPF indicates that the prescriptive requirements relating to affordable home ownership products are removed from the NPPF and guidance, noting that this prioritisation can "*force unhelpful trade-offs, especially in areas where, for example, Social Rent and Affordable rent are most needed*". The Viability Assessment (March 2024) indicates that higher discounts of 40-50% are required for new housing to match the First Homes house price cap and also that these higher discounts would impact on developments with marginal viability.

The Local Housing Needs Assessment (2024) also highlights a significant need for affordable homes to rent in Surrey Heath and the potential adverse impact of prioritising affordable home ownership in policy. We ask that the Council consider altering this policy, to better prioritise affordable homes for rent and shared ownership housing in order to best meet local needs through Registered Provider-managed housing.

Draft Policy H9: Rural Exception Sites

This policy seeks to set a sequential test for the provision of rural exception sites, requiring applicants to demonstrate that affordable housing need cannot be met within a settlement boundary before a site outside the settlement will be considered. As such an approach is not required by national policy this element of the draft policy is not considered sound and should be removed to better encourage the delivery of affordable housing through this mechanism. The supporting text at paragraph 3.114 should also be deleted.

I would be grateful if Abri is updated as the Local Plan progresses through Examination and if these details can be retained on the contact database for future policy consultations.

Yours faithfully,

Mrs Meghan Rossiter MRTPI
Planning Manager
Abri Group
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