

## Surrey Heath Local Plan (2019 - 2038): Pre-Submission - Representation

1. First Name: David
2. Last Name: Chesneau
3. Job Title: N/A
4. Organisation: N/A
5. I wish to be notified when the Pre-Submission Local Plan has been submitted to the Secretary of State for independent examination
6. I wish to be notified when the independent examiner's recommendations are published
7. I wish to be notified when the Local Plan has been adopted
8. My representation relates to much of the document
9. My representation relates to many of its policies
10. My representation does not relate to the document other than as stated in the above two responses
11. I do not consider the Pre-Submission Local Plan to be legally compliant
12. I do not consider the Pre-Submission Local Plan to be sound
13. I do not know whether the Pre-Submission Local Plan complies with the Duty to Co-operate
14. There are no reasons why I consider the Pre-Submission Local Plan to be legally compliant.
15. I consider the Pre-Submission Local Plan is **not** legally compliant for the following reasons:

The NPPF states that Plans should:

i. "contain policies that are clearly written and unambiguous, .... and be accessible through the use of digital tools to assist public involvement and policy presentation."

The Submission document does not encourage public involvement, for its style is unsuitable for a significant percentage of local residents. This is confirmed by standard readability assessment tools. The NHS Medical Document Readability Tool, for example, indicates that even the 'simple' Foreword in the document is appropriate for someone with a reading age of above twenty. The Tool sets this in context by stating: "The average reading age in the UK is 11, so text readability should be a close to 11 as possible, although 13 or below is also a good result." This analysis tallies closely with that given by the Microsoft readability assessment function, which suggest that the way the Foreword is written is appropriate to readers of (US) college graduate-level or above.

The relatively complex format and layout of the complete document is beyond the abilities of simple readability assessment tool. My best effort suggests that it is perhaps marginally less demanding of the reader than is the Foreward.

ii. "be shaped by early, proportionate and effective engagement between plan makers and communities." The council's Statement of Community Involvement states "The Council will work with ['hard to reach groups'.... including older people and those who do not use the internet] to see how to best involve them in the Local Plan". However, a small 'straw poll' of my peer group - some of whom would fit this description - shows that they were unaware of any such initiative to involve them, and that they have little knowledge of the Local Plan process and associated consultation. Even the printed summer edition of the council's 'Heathscene', delivered to households across the borough, refers readers (including non-internet users) to the council's website for more information about the Plan, rather than to their local library. It says: "*Check our website at [surreyheath.gov.uk/draftlocalplan](http://surreyheath.gov.uk/draftlocalplan) and social media channels for updates on the publication of the Pre-Submission Local Plan (Regulation 19) this summer.*"

16. There are no reasons why I consider the Pre-Submission Local Plan to be sound

17. I consider the Pre-Submission Local Plan to be **not** sound for the following reason:

The NPPF states that Plans should:

i. "be prepared positively, in a way that is aspirational but deliverable" I am fully in favour of this policy. However, last year the Council Leader announced that the council had a "*huge debt... which will take decades to pay off... Even the most difficult decisions may not be enough to avert insolvency.*" This is bound to put the council's resources under considerable pressure throughout the Local Plan period. But the document makes no explicit reference to this, or to its constraint on the council's ability to play a reactive, let-alone a pro-active, role in development in the borough. Whether many of the Plan's aspirations are deliverable is open to question. I particularly regret this personally with regard to the Plan's aspirations for Camberley, for I am in favour of many and I support most of the remainder. Notably, redevelopment of the London Road Block was suggested in the Local Plan 2000 but it has been followed by decades of neglect of what is the town's 'shop window'.

ii. Policy 1N2 states that the council "seeks to improve transport capacity and opportunities for travel by rail ". This has been an aim for many years; poor - slow - train service is a widely accepted as putting Camberley at a disadvantage

compared to other nearby towns. But no promising solution has yet emerged. One possibility is to reinstate the link at Frimley Green between the local rail track and the main line services, so, to preserve this option, previous administrations have protected the link route from housing development. However, the Submission document, while recognising this history, identifies the land as a potential site for sixty homes. This would make Policy 1N2 even less deliverable.

18. There are no reasons why I consider the Pre-Submission Local Plan to be compliant with the Duty to Co-operate
19. There are no reasons why I consider the Pre-Submission Local Plan **not** to be compliant with the Duty to Co-operate
20. The following actions are needed to correct the non-compliance that I describe above
  - i. re-write identified parts of the documents in a more readable style. There should be no change in WHAT the Plan says, but in HOW it says it.
  - ii the council should increase its efforts to 'work with hard-to-reach groups' and engage them more in the Local Plan process before it is finalised.
21. The following actions are needed to correct the lack of soundness that I describe above
  - i. a business approach should be adopted to prioritise the various aspirations, and not treat each of them with the same importance - and failing to resource any of them adequately.
  - ii The analysis that apparently favours housing in Frimley Green over - possible - rail improvements should be better publicised and debated. This would clarify whether the 'threat' to Policy 1N2 describe in 4. Is justified.
22. I do not wish to participate at the oral examination.
23. I believe that what I have written above makes in unnecessary for me to participate at the oral examination.

David Chesneau  
17th September 2024

# View Response

## Response #1228953

**From** [Redacted]  
[Redacted]

**Date** Started: 02 Sep 2024 21:49. Last modified: 02 Sep 2024 21:50

**Status** Complete

**Title** Mr

**First Name** David

**Last Name** Chesneau

**Address Line 1** [Redacted]

**Address Line 2** [Redacted]

**Address Town** [Redacted]

**Address County** [Redacted]

**Address Post Code** [Redacted]

**Which of the following categories best describes you?** Member of the public

**Which local areas of Surrey Heath are you specifically interested in?** [Redacted]

Which topic areas  
are you specifically  
interested in?

Design Employment and Economy Housing  
Health (doctors surgeries, dentists, he... Infrastructure  
Cultural facilities Neighbourhood planning  
Town Centre shopping  
District and Local Centre shopping Sustainability  
Transport Renewable energy development and ...

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.

David

2

Last name

You must provide an answer to this question.

3

Job title (where relevant)

«No response»

4

Organisation (where relevant)

«No response»

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.

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

## 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")

9

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

You must provide an answer to this question.

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.



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.

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.

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.

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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.

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.

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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You must provide an answer to this question.

## 22

If your representation is seeking a modification to the Pre-Submission Local Plan, do you consider it necessary to participate at the oral part of the examination?

You must provide an answer to this question.

- Yes, I wish to participate at the oral examination.
- No, I do not wish to participate at the oral examination.

## 23

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

*(Please note, the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.)*

You must provide an answer to this question.

## End of representation

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

**You should receive a confirmation email once you have submitted your representation.**

# View Response

## Response #1230880

**From** [Redacted]  
[Redacted]

**Date** Started: 17 Sep 2024 22:18. Last modified: 17 Sep 2024 22:18

**Status** Complete

**Title** Mr

**First Name** David

**Last Name** Chesneau

**Address Line 1** [Redacted]

**Address Line 2** [Redacted]

**Address Town** [Redacted]

**Address County** [Redacted]

**Address Post Code** [Redacted]

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Which topic areas are you specifically interested in?

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Health (doctors surgeries, dentists, he... Infrastructure  
Cultural facilities Neighbourhood planning  
Town Centre shopping  
District and Local Centre shopping Sustainability  
Transport Renewable energy development and ...

Visibility Unknown.

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First name

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David

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Last name

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Job title (where relevant)

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Organisation (where relevant)

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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?

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Yes

No

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