	<p>Surrey Heath Borough Council</p> <p>Pre-Submission Surrey Heath Local Plan (2019 – 2038) : (Regulation 19)</p> <p>Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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Please return to: planning.consultation@surreyheath.gov.uk
OR
Planning Policy and Conservation, Surrey Heath Borough Council,
Surrey Heath House, Knoll Road, Camberley, Surrey GU15 3HD.

By 12.00 noon 20th September 2024 NO LATE REPRESENTATIONS WILL BE ACCEPTED

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

1. Personal Details*	2. Agent's Details (if applicable)	
<small>*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.</small>		
Title		Mr
First Name		Thomas
Last Name	Mr M Pond, Mr E Pond & Mrs C Plant	Rumble
Job Title (where relevant)		Director
Organisation (where relevant)		Woolf Bond Planning Ltd
Address Line 1		The Mitfords
Line 2		Basingstoke Road
Line 3		Three Mile Cross
Post Code		RG7 1AT
Telephone Number		[REDACTED]

E-mail Address

Do you wish to be notified of when any of the following occurs? (place an X in the box to indicate which applies)

	Yes	No
• The Pre-Submission Local Plan has been submitted to the Secretary of State for independent examination?	X	
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Name or Organisation :

Mr M Pond, Mr E Pond, Mrs C Plant

3. To which part of the Pre-Submission Local Plan does this representation relate?

Paragraph Policy Other, e.g. policies map, table, appendix

4. Do you consider the Pre-Submission Local Plan is? (place an X in the box to indicate which applies)

4.(1) Legally compliant (please refer to guidance notes)	Yes <input type="text" value="X"/>	No <input type="text"/>
4.(2) Sound (please refer to guidance notes)	Yes <input type="text"/>	No <input type="text" value="X"/>
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See supporting statement

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Woolf Bond Planning

Chartered Town Planning Consultants

Planning Policy and Conservation Team,
Planning Services,
Surrey Heath Borough Council,
Surrey Heath House,
Knoll Road,
Camberley GU15 3HD

18 September 2024

Surrey Heath Borough Council - Pre-Submission Surrey Heath Local Plan (2019-2038): (Regulation 19)

We act for Mr M. Pond, Mr E. Pond & Mrs C. Plant who own land at Sherrard Way, Mytchett, which is a proposed housing allocation (HA1/22) identified in Policy SA1 of the draft plan. We write to express support the proposed allocation of site HA1/22 ("the land at Sherrard Way"), on the basis that it can make a positive contribution to meeting housing needs in the Borough. Our representations are summarised as follows:

Policy	Position	Comment
Policy HA1 – Site Allocations	Support Policy Intention (Allocation HA1/22) but suggest refinement of drafting.	Suggested refinements to drafting of the policy, to enhance clarity.
Policy GBC4 – Development within the Countryside beyond the Green Belt	Support Policy Intention but suggest refinement of drafting.	Suggested refinements to drafting of the policy, to enhance clarity.
Policies Map	Support Intention (Allocation HA1/22) but wish to comment on detailed boundary of identified allocation.	Suggested refinements to settlement boundary at Mytchett, and boundary of allocation HA1/22 to include access points and restrict to low flood risk land.
Policy DH2 – Making Effective Use of Land	Support	Proposed density at Mytchett is supported.

Policy HA1: Site Allocations & GBC4: Development within the Countryside beyond the Green Belt

By virtue of Policy HA1 (Site Allocations), a number of sites across the Borough are allocated for residential development. As confirmed at paragraph 3.3 of the Pre-Submission Local Plan, the proposed allocations set out in Policy HA1 are considered by the Council to be sustainably located and have been selected with regard to national policy and the selected spatial strategy for Surrey Heath. We support and endorse this approach and conclusion.

In the SLAA 2023, the land at Sherrard Way (proposed allocation HA1/22) is identified as site 912. The site assessment, set out in SLAA Appendix 2, page 224, confirms the many positive attributes of the site, which we summarise as follows:

- Situated outside the Green Belt (noting that “nearly half” of the Borough is designated as Green Belt; as set out at paragraph 1.31 of the pre-Submission Local Plan);
- Adjoining the defined settlement area of Mytchett;
- Relatively open in character, with wooden borders on the south and western boundaries, which provide some screening from the wider countryside;
- Existing equestrian (as opposed to agricultural) use;
- The parts of the site closest to the existing built up settlement are at lowest risk of flooding, Flood Zone 1; modelling indicates they will remain in at Zone 1 in 2080, factoring in climate change impacts;
- The site is in single ownership and is available immediately; these factors, coupled with its smaller size (with a developable area in Flood Zone 1 of less than 1ha) mean it can quickly make an important contribution to housing supply (as recognised by paragraph 70 of the NPPF). The Council is required to deliver 10% of its housing on smaller sites less than 1ha, and this site could assist in that regard.
- The site benefits from two potential access points onto Sherrard Way; a highways consultant has reviewed the access arrangements and confirmed they can safely accommodate development at the scale proposed.
- The location is sustainable; the site is at the edge of an existing residential development, which is on the edge of an existing built up residential area. There are leisure, education and retail facilities within walking distance of the site, along with bus stops offering an hourly service. The nearest train station is a cyclable distance.

- Development of the site would have a “limited impact on the character of the countryside” as it is somewhat removed, being situated between the A331 and the Mytchett lakes.
- The proposed allocation for 16 dwellings takes account of the site constraints (in particular flood risk), and is developable, taking account of the need to avoid the higher risk parts of the site near the river.

We also note that site HA1/22 is adjacent to the existing development of 24 dwellings at Sherrard Way, which was consented in 2005. When granting permission for those dwellings in 2005 the Council were content that the form and layout of dwellings at Sherrard Way would respect the scale, pattern and character of surrounding development in Mytchett, and not give rise to adverse impacts on the amenities of neighbouring properties. This additional land, HA1/22 can equally be developed at a similar grain, thereby respecting the character of the area and seamlessly knitting together with the fabric of the existing settlement.

To enhance clarity and assist in the determination of applications which come forward on these sites, we recommend that the allocation of housing sites HA1/10-HA1/25 is more clearly expressed, in policy terms. The revisions detailed below would enable a more **justified** and **effective** plan when compared to its current drafting and therefore would assist in the plan’s assessment against the relevant tests of soundness.

For site allocations delivering 10-24 dwellings (which includes the land at Sherrard Way, Mytchett, which has capacity for 16 dwellings) it is not explicitly clear in the plan, as drafted, that these sites are in fact allocated (as opposed to being identified as future sources of supply). The sites are listed in bullet points, without express wording stating that they are allocated. Policy GBC4 operates to support countryside development of sites allocated in Policy HA1 but is not expressly clear that it relates to HA1/10-HA1/22, as well as the HA1 sites benefitting from their own specific policy (HA1/1-HA1/9).

We suggest that the heading of the shaded box, containing the list of allocated sites (delivering 10-24 dwellings), should be amended to read:

“Policies HA1/10 to HA1/25: Small Site Allocations for sites delivering 10-24 net new homes”.

The policy should then specifically include the text:

“The following sites are allocated for residential development, at the approximate scale set out below, taking due account of site specific considerations during the detailed design stage.”

Policy GBC4 could equally be amended to make clear that *development within the countryside is acceptable in principle, on an allocated site – and list specifically the sites to which this applies (including HA1/22).*

These comments are important given the plan's reliance (as a source of housing supply) on smaller SLAA sites which are not specifically allocated. These comparatively larger allocations (HA1/10-22) should clearly be allocated for housing, rather than simply identified as "projected" sources of housing.

Furthermore, the scale of each site allocation should allow some flexibility to ensure environmental constraints and other requirements such as biodiversity net gain can be appropriately accommodated. As presently worded, the policy allocates HA1/22 for 16 dwellings, not 15 or 17, for example. We suggest that the quantum should be prefaced by words noting that this is 'subject to detailed design' or similar (as reflected in the wording revisions suggested above).

Policies Map

We support the inclusion of an identified housing allocation for site HA1/22 on the policy map. We suggest that the settlement boundary annotation should be realigned, to include this allocated site within the settlement of Mytchett.

As noted in the SLAA, parts of site HA1/22 are in Flood Zones 2 and 3 and it is not anticipated that housing would be proposed in these areas. The Council's Interim Sequential & Exception Tests for Site Allocations report (Aug 2024) confirms that the site passes the sequential test¹. At application stage, it will be necessary for the proposal to be supported by a site specific flood risk assessment and it would be appropriate to guide the development footprint to the lower risk parts of the site. Our client is aware of this and is understanding of allocation in these terms; the site remains available and viable.

Given that only the lower risk parts of the site are anticipated for development, we suggest that the Council could consider either amending the boundary of the proposed allocation, to restrict this to Zone 1 land (as shown in Figure 1 below), or alternatively include additional text within the policy to make clear that at design stage the development would need to suitably address this constraint. This may assist in refuting any suggestion during examination of the plan that the site is not developable or deliverable.

¹ Given the limited pool of available sites, there are limited options for meeting housing needs in the borough. The interim report confirms that it is not possible to accommodate the proposed development on other sites at lower risk, as all available identified sites are to be allocated.



Figure 1 Proposed Amended Boundary for HA1/22

For present purposes we wish to make clear that the site is deliverable at the scale proposed. The current allocation boundary includes over 0.6ha of land in Flood Zone 1; Policy DH2 suggests a density of 40dph in this location. As such, the Zone 1 land alone can comfortably accommodate the 16 dwellings allocated on the site, without recourse to any of the Zone 2 or 3 parts of the site. The wider land has the potential to be used productively as a second access point, open space and / or biodiversity net gain.

Finally, the point of principle relating to including allocated sites within updated settlement boundaries is wholly logical given they would become by default residential developments in due course and thus their (technical) retention in a countryside location is illogical. Consequently, an amendment to the policies map to include the land within an updated settlement boundary is advocated as a more **plan led** and **effective** approach towards the issue.

In summary, we suggest that additional text is included within Policy HA1 to make clear that at the design stage the development word suitably address the flood zone constraint or the boundary of the proposed allocation is amended so to enable improved precision. If the latter, logically the site would be allocated and included within a settlement boundary as per the red line illustrated in Figure 1 above.

Policy DH2: Making Effective Use of Land


This policy is supported. The proposed density of 40dph at Mytchett is considered appropriate to the grain of existing built form in the area. Site HA1/22 can comfortably accommodate 16 dwellings at this density on unconstrained land.

Yours sincerely



Thomas Rumble BSc (Hons) MSc MRTPI

Encs.

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First Name		Thomas
Last Name	Mr M Pond, Mr E Pond & Mrs C Plant	Rumble
Job Title (where relevant)		Director
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Name or Organisation :

Mr M Pond, Mr E Pond, Mrs C Plant

3. To which part of the Pre-Submission Local Plan does this representation relate?

Paragraph

Policy

GBC4

Other, e.g.
policies map,
table, appendix

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4.(1) Legally compliant (please refer to guidance notes)

Yes

No

4.(2) Sound (please refer to guidance notes)

Yes

No

4.(3) Complies with the Duty to Co-operate (please refer to guidance notes)

Yes

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Policy Map

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