

	<p><b>Surrey Heath Borough Council</b></p> <p><b>Pre-Submission Surrey Heath Local Plan (2019 – 2038) : (Regulation 19)</b></p> <p><b>Representation Form</b></p>	<p>Ref:</p> <p><b>(For official use only)</b></p>
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**Please return to:** [planning.consultation@surreyheath.gov.uk](mailto: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 20<sup>th</sup> September 2024 NO LATE REPRESENTATIONS WILL BE ACCEPTED**

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 sheet for each representation you wish to make.**

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

**Please read the separate guidance notes before completing this form.**

## Part A

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	Glenn	
Last Name	Coles	
Job Title (where relevant)	Strategic Land Director	
Organisation (where relevant)	Redrow Homes	Turley
Address Line 1		
Line 2		
Line 3	Basingstoke	Southampton
Post Code	RG24 8QB	SO15 2RP
Telephone Number		

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	
• The independent examiner's recommendations are published?	X	
• The Local Plan has been adopted?	X	

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 – Please use a separate sheet for each 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.

<b>Name or Organisation :</b>	Turley (obo Redrow Homes)
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### 3. To which part of the Pre-Submission Local Plan does this representation relate?

Paragraph	<input type="checkbox"/>	Policy	<input type="checkbox"/> SS1	Other, e.g. policies map, table, appendix	<input type="checkbox"/>
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### 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="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound (please refer to guidance notes)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/> X
4.(3) Complies with the Duty to Co-operate (please refer to guidance notes)	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

5. Please give details of why you consider the Pre-Submission Local Plan is not legally compliant or does not meet the tests of soundness or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Pre-Submission Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments. You are advised to read our Representations Guidance note for more information on legal compliance and soundness.

The latest published Surrey Heath Local Development Scheme (March 2024) indicates the anticipated adoption of the Local Plan in Autumn 2025. The current plan period extends to 2038.

Paragraph 22 of the Framework (December 2023) indicates:

*‘Strategic policies should look ahead over a minimum 15 year period from adoption...’*

To be consistent with national policy and be positively prepared, the plan period should accordingly be extended to 2040 as a minimum. Opportunities to address the resultant land supply shortfall ought to be explored prior to formal submission of the Local Plan. This should include a thorough review of all sources of supply, including lands designated within the Green Belt.

Section 20(2) of the PCPA states that the LPA must not submit their Local Plan unless they think it is ready for independent examination. Paragraph 1.2 of the Procedure Guide for Local Plan Examinations elaborates, stating:

*‘Having considered the Regulation 19 consultation responses, the LPA should only submit a plan if they consider it to be sound ..... Before submission, the LPA must do all it can to resolve any substantive*

concerns about the soundness or legal compliance of the plan, including any raised by statutory undertakers and government agencies. (our emphasis).

Paragraph 1.5 of the same document sets out the procedure to follow if the LPA do wish to make changes to remedy issues of soundness prior to formal submission of the Regulation 19 Plan:

'If the LPA wish to make changes to the plan following the Regulation 19 consultation and before submission, and wish the changes to be considered as part of the submitted plan, they should prepare an addendum to the plan containing the proposed changes. The addendum, together with a sustainability appraisal [SA] and Habitats Regulation Assessment [HRA] of the proposed changes if they are significant, should be published for consultation, on the same basis as the Regulation 19 consultation, before the plan is submitted for examination.' (our emphasis).

This approach will reduce the prospect of substantial modifications having to be made and consulted on during the examination process, aligned to the aforementioned guidance; and more recent letter from Matthew Pennycook MP to the Planning Inspectorate dated 30 July 2024.

Section 4 of the Council's Housing Topic Paper confirms that a significant degree of reliance is already being placed on increasing the yield expectations from key town centre sites and from uncertain windfall sources to meet existing calculated requirements. This is even before accounting for the assistance Hart District Council is providing with supply for the period to 2031/32.

The Council proposes to deliver a marginal land supply buffer of just over 7% in supply versus their corresponding requirement to address the potential for non-implementation or slippage in their housing land supply assumptions. This is considered a relatively minor buffer, and likely minimum, particularly given the further reliance placed on achieving the built-out rates currently afforded the Princess Royal Barracks site in Appendix 1 of the same document.

As a consequence, and for the reasons outlined, the Council should explore the allocation of a minimum of a further two years of housing supply to meet needs for the full 15 years post anticipated adoption of the Local Plan in 2025.

This should, for the reasons stated, be explored prior to formal submission of the Local Plan to address the matters of soundness outlined.

If the Council proceed to submit the plan without such a change, to ensure the plan benefits from the transitional arrangements proposed in the July 2024 consultation version of the NPPF for example, then we would respectfully request such matters be addressed through the modifications process of the Examination, to ensure the made plan is sound and setting off on the right foot.

This is particularly important when one considers the proposed revisions to the standard method calculation the Government are currently consulting on. If published in the same (or even substantially similar) form, the Council's calculated housing need would in fact be 658pa as opposed to the 320pa at present. This illustrates the acute shortage in supply, particularly for affordable housing in the metric calculation.

Our client has land interests adjacent to both Bisley and West End that they would welcome the opportunity to discuss further with the Council in this context, either prior to submission of the Local Plan, or publication of any subsequent Main Modifications consultation to address such concerns.

We trust such comments prove useful in evolving the Local Plan to the next stage of production. We would welcome the opportunity to meet with Officers to discuss such matters further.

(Continue on a separate sheet / expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Pre-Submission Local Plan legally compliant and sound, having regard to the matters you have identified at 5 above. (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.

This is set out in more detail above. To be consistent with national policy and the positively prepared tests of the Framework, the plan period should be extended to 2040 as a minimum. Opportunities to address the resultant housing land supply shortfall ought to be explored prior to formal submission of the Local Plan, or at the very least during the modification stages of the Local Plan examination process. This should include a thorough review of all sources of supply, including lands designated within the Green Belt, with consultation undertaken on the proposed allocations and reasonable alternatives.

(Continue on a separate sheet / expand box if necessary)

**Please note** your representation should cover succinctly all the evidence and supporting information necessary to support/justify your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions will be only at the request of the Planning Inspector, based on the matters and issues he/she identifies for examination.**

7. 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?

**No**, I do not wish to participate at the oral examination

**Yes**, I wish to participate at the oral examination

Please note - whilst this will provide an initial indication of your wish to participate in the examination, you may be asked at a later point to confirm your request to participate.

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

To elaborate on the matters of soundness outlined and assist the Inspector conclude on the modifications necessary to address these.

**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.