

SHBC Draft Local Plan: Comments by the Mytchett, Frimley Green & Deepcut Society

The Mytchett, Frimley Green & Deepcut Society is a long-standing representative group working for and on behalf of the local residents of the three villages. The comments below are made in response to consultation exercise on the Draft Surrey Heath Local Plan: Preferred Options (2019 – 2038) Regulation 18 Consultation.

Firstly, we would like to acknowledge the tremendous amount of work and effort that has undoubtedly gone into this draft plan. The evidence base looks sound and the structure of the plan looks to be compliant with the set requirements. There is much to like about the plan and the broad intent to make this work well for the Borough is clearly evident. We hope that you find the following comments constructive and helpful in further strengthening the plan.

Vision for the Borough

The vision (p.27) provides the overarching context for the objectives and plans that follow. To that extent the substance is fairly sound. It is, however, rather flat and uninspiring. It would also be helpful to articulate what sort of Borough we want to be. Glasgow says it wants to be a great place to grow old. Out of that comes various supporting policies to help make that happen. Good demographic evidence would help inform our direction of travel - do we need more homes suitable for the elderly, do we want to be a leader in supporting home working, do we want to be a community proud to be carbon zero? We may not be a unique area but we can at least reflect the character and aspiration that we wish to create.

However, based on what is actually in the plan, here are our comments on the specifics.

Housing

1a. The Society accepts the principle of development at Frimhurst Farm, Deepcut and Land West of Sturt Road, Frimley Green (p.52). Regarding the latter site, however, we place on record once again that, in our view, 160 homes are too many for the site. In respect of HA1/08 (p.59), regarding Land West of Sturt Road, it is our understanding that the Council's Planning Applications Committee granted permission (20/1048) for 160 homes on this site on 11th November 2021. Some of the Development Requirements listed on page 59 were NOT included as part of that planning permission. We note, however, that according to the Council's website that application 20/1048 remains undetermined (as of 4th April 2022).

1b. Affordable Housing - We welcome Policy H7 (p.100) but are concerned that Paragraph 3 of the policy is not robust enough in respect of financial viability. We believe the Council should be responsible for appointing consultants (but funded by developers) as well as agreeing the terms of the assessment.

1c. Sustainability - Guildford Borough Council require developers to identify where they source their materials as part of their sustainability statement. This encourages developers to demonstrate the sustainability of their plans and many realise they can get some 'quick wins' by sourcing more of their materials locally. We would like to see Surrey Heath take a similar approach.

Gypsies, Travellers & Travelling Showpeople

2. Sites - we recognise this is a tricky and often controversial subject however we broadly support the idea put forward in the plan for multiple small scale sites.

We are surprised, however, to see in HA1/10 the land west of Sturt Road (p.61/62) is to provide the maximum number of pitches since, as stated above, it is our understanding that the Council's Planning Applications Committee granted permission (20/1048) for 160 homes on this site on 11th November 2021 and no Condition or Informative concerning Gypsy or Traveller pitches was attached to that planning permission. We note, however, that according to the Council's website that application 20/1048 remains undetermined (4th April 2022) and if this is correct, we ask that the following be noted:-

- i) It would be best to specify a maximum number of pitches; an amount consistent with sites being small scale (and to then engage with the local community on this issue, certainly at an earlier stage than now).
- ii) For this site and all sites, there should be a corresponding reduction in built dwellings to create the space rather than further cramming and adding to issues of density.
- iii) It would be essential to express the need for balance between integration and separation on these sites. For example, adequate screening, to provide privacy for all parties, needs to be assured but still allowing easy access without any barricading.]

Local Area Profile: Frimley Green (p.286)

3. The Green - we welcome the re-designation of the village green as a protected greenspace. It was clearly a mistake to withdraw that designation despite its Common Land status and we said so at the time. It is good to see this additional protection re-introduced.

4. Housing - we understand the rationale behind setting the density standard to 40 dwellings per hectare. However, Frimley Green is not entirely an urbanised location. To the North it is more built up but in other directions it abuts significant areas of open countryside, more akin to a Defined Settlement Area such as West End or Lightwater. A density range of 30-40 dph would be preferable with 40 dph where a development is primarily bounded by existing housing and 30 dph where it is bounded primarily by green spaces or countryside.

5. Employment and Retail - we strongly support the proposal for the land at SC Johnson to be protected as a Locally Important Employment Site.

6. Transport - we strongly support the safeguarding of the Sturt Chord as a potential future rail link.

7. Cycling, walking and public transport - the sentiments of promoting and supporting pedestrian, cycle and public transport improvements is to be applauded but we are concerned about the vague nature of the phrasing. We would like to see this strengthened considerably, for example, by setting a target eg a 20% increase in the cycle network by 2030, by naming a specific project eg making the passage under the Sturt Road bridge suitable for wheelchairs, or by identifying priorities eg extending the bus times to and from Camberley into the evening. This approach extends to the other villages too.

Local Area Profile: Mytchett (p.287)

8. Employment and Retail - we support the allocation of the Frazer-Nash Research site as a Strategic Employment Site and the Linsford Business Park as a Locally Important Employment Site (please note you have misspelt Linsford and Frazer-Nash in the plan).

9. Transport - improving access to the Basingstoke canal seems laudable but it is not clear what this means in practice. There is already good access along most of the canal. Rather than mention this under transport it might be more appropriate to commit to increasing support to the Basingstoke Canal Authority - particularly by increasing the grant to fall in line with the support given by other authorities - to enable them to provide improved access to leisure opportunities.

Local Area Profile: Deepcut (p.276)

10. Neighbourhood Plan - we strongly support the emerging Deepcut Neighbourhood Plan and we feel sure it will, in conjunction to with the Local Plan, be a valuable resource to help guide future development and improvements in the area.

11. Village Green - we would like to see a commitment in the plan to register Deepcut village green under the Commons Act 2006. This would offer appropriate protection consistent with IN6 and would be a definite action not just fine words.

Design & Heritage

12. Space standards (DH3) - rather than expecting developers to simply meet the minimum (Class 3) standard, we would like to see this strengthened by requiring developers to demonstrate how they will exceed this standard.

13. Sustainable water use - storage of rainwater rather than just being 'encouraged' (DH4) should be 'required wherever feasible' with a minimum standard set at a 300 litre container.

14. Renewable Energy (p.198) - perhaps one of the most important points we can make is that the approach to carbon reduction and local, clean, renewable energy falls well short of where it needs to be. The sentiments expressed are well intentioned but the phrasing is weak and lacks specificity; we fear it might leave things wide open for developers to find exceptions and loopholes. We appreciate that further detail would be in Supplementary Planning Document but the defining policy and standards needs to be clearer and stronger within the local plan.

There will be increased demand because of increased car charging points and electric domestic heating. The Committee on Climate Change estimates that renewable electricity generation needs to quadruple to meet these demands. In 8.11 (p.230) the plan mentions good design to 'maximise' provision of onsite renewable energy. We would like to see developers required to demonstrate how they will maximise local renewable energy with the local plan setting clear and ambitious minimum standards.

We would also like to see a statement that confirms that the council will only accept exemptions from that ambition in exceptional cases where there is overwhelming and incontrovertible evidence regarding feasibility. We would also like to see the whole issue of carbon reduction and sustainability given far more prominence within the structure and layout of the plan; giving a clear signal to the community and to potential developers that this issue is a top priority for the council.

Cllr Richard Millard, Leader of East Hampshire District Council, says:

"Our new Local Plan will be a 'Greenprint' for the district. It will set the highest possible standards in sustainable house-building and empower us to demand developers meet those standards. It is ridiculous that homes being built now will need to be retro-fitted with energy-saving measures in 10 or 15 years' time. Today's homes should be built to meet tomorrow's challenges. That's why we will be challenging the Government to approve our policies of zero-carbon homes and pushing developers to meet them.

"The Government's national planning policies do not go far enough, so we will demand more. And if we can enshrine these policies in an adopted Local Plan we will have the power to enforce them. Energy efficient homes have a lower carbon footprint and are cheaper and more comfortable for our residents to live in. That meets our environmental priorities and our welfare priorities. We know it's not easy to achieve, but if the Government is serious about stopping climate change they should support our Local

We would like Surrey Heath to at least match, if not go further than, our neighbours in East Hampshire so there needs to be more commentary to support related issues such as district heating, going beyond a 'fabric first' approach and getting all new development at net zero by a specified date.

Frimley Park Hospital (ER6)

16. Development proposals (p.148) - the points in ER6 seem sensible enough. We would like to see one further provision and that is development proposals will be supported where they reflect the changing and likely future demands of residents in the Borough.

Transport (IN2)

17. Charging points (p.165) - as well as vehicle charging points we would like to see electric bike charging points incorporated into all bike racks, especially when linked to blocks of flats.

Digital Infrastructure and Telecommunications (IN3)

18. Telecomms (p.169) - 5G technology is moving on at a pace and in view of the timescale of the local plan it would seem sensible to us to add a further point in the plan encouraging greater responsiveness and requiring developers to future-proof any development wherever possible based on emerging trends at that point in time. Antennas built into houses, for example, may supersede the masts of today, though we don't know this yet. Typically it will be just after the plan is approved that a major shift takes place and there needs to be a suitable form of words to enable both the council and the developer to respond appropriately.

[Alternatively, it may be prudent to have a rider that applies across the whole local plan that acknowledges that we live in a fast changing world and that the council reserves the right to replace or supplement any of the standards, targets or conditions in the plan with subsequent Government, Industry or otherwise approved standards, requirements and best practices].

Biodiversity Net Gain (E3)

19. Biodiversity (p.191) - we welcome the statement that proposals will be permitted where a 20% net gain can be demonstrated. We accept that an off-site bespoke 'off-set' project may be necessary in some circumstances or to buy credits from a 'habitat bank'. We would welcome, if possible, to require that positive impact to remain within the Borough rather than being in Hampshire or the other side of Surrey.

General Points

20. The terminology used in the plan needs to be clear and consistent. We would suggest the following:

- **should** - the primary verb for statements of guidance; **may** - where the guidance suggests options;
- **must** - used where there is a legal/statutory requirement for the measures described to be employed or where the council has the authority to set an imperative. Reference to any Act or Regulations should be provided;
- **is (are) required** - having decided upon a particular option or arrangements, some consequential choices stem from that first decision. This expression is used to indicate those consequential choices and where firmer guidance is considered appropriate.
- terms like 'support' and 'encourage' should be used with caution; they may be suitable in broad, introductory statements where more specific requirements are defined in the subsequent sections.