



The countryside charity
Surrey

NPPF24 - The Surrey Perspective

Response by the Surrey Campaign to Protect Rural England (CPRE Surrey) to the Government's Proposed New National Planning Policy Framework (NPPF24)

Quality of Life and Biodiversity:

If Surrey's housing targets, using the new Standard Method, are met every year, all of Surrey's 11 districts will see a population increase of between 32.9% and 49.3% over the next 20 years, growing by just under half a million (497,184) to 1.73 million (from the current 1.23 million). Overall, the increase would be just over 40%. This is completely unsustainable in what is already a severely congested county with chronically stretched public services and infrastructure. Such an increase would inflict serious damage on the natural environment, especially in terms of biodiversity, at a time when we should be working to reverse the downward trend and aid nature recovery. We also need to retain our farmland for local food production.

NOTE 1 - POPULATION: The largest population increase would be in Waverley (49.9%), followed by Elmbridge (49.3%), Epsom & Ewell (47.8%), Tandridge (41.5%), Mole Valley (41.2%), Reigate & Banstead (38.9%), Woking (36.5%), Guildford (35.5%), Spelthorne (35.0%), Surrey Heath (34.3%), and Runnymede (32.9%). These figures assume that the new housing targets would remain the same for the next 20 years – the period of most Local Plans – and that housing occupancy will remain at 2.4 persons per dwelling. The overall increase for the South East Region (excluding London) is 3.31 million, a 35.7% increase from 9.28 million to 12.59 million.

NOTE 2 – HOUSING NUMBERS: Under the new Standard Method the increases in housing requirement (against the current Standard Method numbers) are: Elmbridge 121%, Surrey Heath 106%, Reigate & Banstead 96%, Waverley 94%, Woking 82%, Mole Valley 65%, Guildford 48%, Epsom & Ewell 43%, Tandridge 22%, Spelthorne 20% and Runnymede 14%.

Affordability and Housing Need:

The formula for calculating housing numbers is totally inappropriate for Surrey and will not solve the affordability crisis as property prices here are predicated on London commuter salaries, not local wages. By leaving housebuilding almost entirely to the volume builders, who mainly want to build larger houses rather than flats or starter homes, Surrey will become even less affordable than it currently is. The emphasis of the NPPF24 is on addressing housing requirements through the free market, when in Surrey

the need is not for more market housing but for social housing focused on key workers and lower income families, and we should therefore be encouraging and facilitating local authorities and housing associations to build the local homes that are needed, not leaving housebuilding to the market.

In CPRE Surrey's view, the definition of affordable housing must be changed. With the current definition there is a high risk that the houses built in Surrey under the new mandatory targets will not be available or affordable for the people in greatest need. 'Affordable' should not simply mean a relatively minor reduction of the existing price (which in terms of Surrey's housing is still unaffordable for those in need) but should encompass social rent, equity share and other housing choices. Without a change in definition the whole objective of meeting genuine housing needs will fail in Surrey.

Green Belt and 'Brownfield First':

We agree with the emphasis on brownfield development but there is no mechanism as to how this will be enforced or controlled in Local Plans. Without such a mechanism, Green Belt countryside, which is more attractive for the volume housebuilders than previously developed land, could still be used first. The definition of 'Grey Belt' must be significantly tightened up to mean previously developed land *only*. Furthermore, we believe that the NPPF24 'sequential test' which will identify potential housing sites is fundamentally flawed. Faced by the new (Standard Method) housing targets, and without restricting 'Grey Belt' to brownfield land, there is a very strong probability that many local authorities in Surrey will have no option but to identify higher performing Green Belt land for development in their Local Plans.

Local Democracy and Consent:

The NPPF's new Standard Method housing numbers are *mandatory*, not advisory, and so cannot be challenged by local authorities through the Local Plan process. This is a complete change from how the planning system works at present. In Surrey it would lead, without public consent, and against the wishes of local communities, to the loss of many areas of Green Belt countryside, as well as imposing a huge strain on existing, already overstretched, physical and social infrastructure. Without a stronger democratic element, and without local authorities being able to cite planning constraints such as Green Belt which hitherto have been a key component of the planning process, local communities and their elected representatives will be unable to shape and guide the development of their local areas and decisions with a profound and far-reaching effect on the lives of communities will in effect be taken mainly by commercial housebuilders.

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