

# Development in Surrey - Position Statement

## 1. Need for a position statement

In the coming decades we are set to witness a period of substantial development across Surrey that is likely to extend the outer limits of many of our larger towns and villages. The current situation has prevailed largely since the 1960s, due in part to implementation of the Metropolitan Green Belt policy. The eleven Surrey local planning authorities are all at various stages along the process of identifying land to accommodate this predicted growth. There will inevitably be impacts on wildlife and biodiversity, but in order to meet government expectations of 'sustainability' these can and must be balanced by seizing the parallel opportunities for meaningful wildlife habitat restoration and re-creation.

The Trust is increasingly lobbied by various constituted groups, bodies and individuals (including many members) who are understandably alarmed with this level of impending change and the implications for their much-loved local wildlife. Meanwhile we are also consulted directly by the individual authorities on their emerging Local plan documents, sometimes as neighbouring land-owners or managers but also as the leading eNGO in Surrey to champion wildlife conservation, and indeed as specialist planning consultants. We also have a further, relatively new consulting role as a leading partner in the Surrey Nature Partnership. Sound internal communications are essential as varying departments within the Trust are affected. Our response with any of these approaches will inevitably be governed by the pertinent circumstances of the particular proposal, but here we set out our overall stance on this current surge in development pressure across the county, including a 'check-list' of the considerations at stake when we respond to individual housing or employment land allocation cases and planning applications.

## 2. Background

After a lengthy period of relative stasis and even decline, the UK population is again rising. This increase is moreover focused presently in the prosperous southeast of England, driven largely by net migration into the region rather than any intrinsically high birth rate. On Greater London's western doorstep, wealthy Surrey is a highly attractive destination of choice and unsurprisingly is the UK's most densely populated Non-Metropolitan County. There is already a chronic housing shortage here, especially at the 'affordable' end of the scale and it would be a clear dereliction of duty for planning authorities to ignore such facts when looking towards future provision. Specialist analyses evidencing this high housing need are often challenged but the revisions never show any great variation.

At the same time the Trust is working to its *Living Landscapes* vision and strategy, whereby we advocate for a more enlightened approach to future land-use that serves to rebuild biodiversity as an investment in the Natural Capital that it represents, and that we as humans depend on. Through this we aim to restore ecological functionality at the landscape scale, providing opportunities for wildlife populations to adapt to future climatic and other pressures on their habitats. Improving landscape *permeability* for wildlife through enhanced habitat *connectivity* is key to achieving this. Influencing the local planning of changes to land-use probably represents *the* most important opportunity to work within the planning system to deliver optimally-located, significant gains for biodiversity in terms of Priority habitat<sup>1</sup> maintenance, restoration and re-creation. To turn our backs on such an opportunity would be counter-productive to the overarching *Living Landscapes* mission of the Trust.

The Trust will therefore always seek to join the dialogue between developers and planners, to set out our *Living Landscapes*-directed wish-list at the earliest opportunity. No doubt there will

be instances where we are at first rebuffed, but such is the current state of flux around policy-driven and statutory obligations requiring environmental protection measures that our offer of advice and a possible way through the perceived confusion is likely to eventually be welcome.

## 3. Development requirements

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<sup>1</sup> Listed under Section 41 of the Natural Environment & Rural Communities Act 2006 as 'Habitats (& Species) of principal importance for the conservation of biological diversity in England' (for which public bodies are obliged to have regard under Section 40).

### ‘Good development...’

- Is supported by early presentation of well-informed, competently produced & fully independent ecological impact assessment(s);
- Shows a positive response to NPPF para. 109<sup>2</sup>: “*The planning system should contribute to and enhance the natural and local environment by: minimising impacts on biodiversity and **providing net gains** where possible, contributing to the Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures*”;
- Recognises presence/proximity of **Biodiversity Opportunity Areas (BOAs)** as priority areas for targeting enhancements, attracting maximum leverage in terms of contributing to Priority habitat restoration & creation and Priority species recovery projects, both on &/or off site;
- Provides for adequate **Green Infrastructure** needs within and beyond the site by contributing to any local GI or other Access to Nature strategies, and the development of wildlife corridors/stepping stones linkages within & between BOAs;
- Where stringent application of the biodiversity impact ‘mitigation hierarchy’ (see NPPF para. 118), identifies remaining compensatory requirements, the ‘Biodiversity Offsetting’ multiplier metric is unerringly and consistently applied;
- Features original and innovatively-designed biodiversity enhancements within the built environment, including green/brown roofs & walls, bespoke micro-habitats for priority species, wildlife under- & over-passes, sustainable drainage & flood alleviation measures adapted as wetland habitats.
- Takes long-term responsibility for the funding and monitoring of biodiversity conservation mitigation & compensation projects.

### ‘Bad development...’

- Extorts planning decision-making in ignorance of all relevant biodiversity constraints & opportunities;
- Severs or sterilises existing or potential opportunities for improved wildlife habitat connectivity, especially within/proximal to BOAs;
- Is of a scale or density where it is impossible to provide adequately for Green Infrastructure, and therefore to manage any elevated impacts on sensitive biodiversity from informal recreational use.

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<sup>2</sup> See; National Planning Policy Framework, Chapter 11 (DCLG, 2012)