



Development in Surrey

Surrey Wildlife Trust Position Statement

1. Need for a position statement

In the coming decades we are set to witness a further period of substantial development across Surrey that will extend the outer limits of many of our larger towns and villages. This focus of growth on existing settlements has prevailed largely since the 1960s, due in part to ongoing implementation of the Metropolitan Green Belt policy. The eleven Surrey local planning authorities are all at various stages of identifying land to accommodate this predicted growth.

There will inevitably be impacts on wildlife and biodiversity, but in order to meet government requirements to demonstrate 'sustainability', these must be balanced by seizing the parallel opportunities for gainful wildlife habitat restoration and recreation. The Trust is lobbied by a variety of constituted groups, bodies and individuals (including many members) who are understandably alarmed with this level of change and the implications for our much loved local wildlife. Meanwhile we are also consulted directly by the individual authorities on their emerging Local Plans and associated documents, sometimes as neighbouring land owners or managers but also as the leading eNGO in Surrey championing wildlife conservation, and indeed as specialist planning consultants. We also have a further, more recent consulting role as a leading partner in the Surrey Nature Partnership.

Sound internal communications are essential as varying teams within the Trust will be contacted at different times. Our response with any of these approaches will inevitably be governed by the pertinent circumstances of the specific development proposal, but here we set out our overall stance on this current surge in development pressure across the county, including a 'check-list' of our considerations when we respond to housing or commercial land allocations and planning applications.

2. Background

After a lengthy period of relative stasis and even decline, the UK population is again rising. This is moreover focused in the prosperous south-east of England, driven largely by economic migration into the region rather than any intrinsically high birth rate. On London's western doorstep, wealthy Surrey is a highly attractive destination of choice and is unsurprisingly the UK's most densely populated non-Metropolitan county. There is already a chronic housing shortage here, especially in the 'affordable' category and it would be a clear dereliction of planning authorities to ignore such facts when looking towards future provision. Standardised analyses evidencing this high housing need as required by national planning policy (such as SHMA¹) are often challenged but their revisions never show any great variation. An example was the West Surrey SHMA (for Guildford, Waverley and Woking Boroughs), as revised in 2015.

3. Position & policy

Meanwhile the Trust is working to promote its Living Landscapes vision, where we advocate for a more enlightened approach to all uses of land that will serve to recover our depleted biodiversity as an investment in the 'natural capital' that it underpins, on which we as humans all depend. Through this approach we aim to rebuild ecological function at a landscape scale that provides 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 the key to this, to eventually produce a 'Nature Recovery Network'.

Influencing the local planning of land-use changes probably represents the most important opportunity to work within the current planning system to deliver optimally-located, meaningful gains for biodiversity in terms of priority habitat² enhancements, restoration and recreation. To turn our backs on such an opportunity would be counter-productive to the Trust's overarching Living Landscapes mission to protect and recover Surrey's wildlife. The Trust will therefore always seek to join the dialogue between developers and planners, in order to advocate strongly for this Living Landscapes vision at the earliest opportunity.

There may be instances where there is reticence to engage in such dialogue, but there is now growing momentum and indeed a soon-to-be legislated requirement for generating measurable 'net gains' for biodiversity³ to apply to most development scenarios, such that our offer of advice and a possible way through any initial confusion is likely to be welcomed.

1 Strategic Housing Market Assessments, as required by national planning policy. See: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>.

2 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).

3 See: Biodiversity Net Gain: Good practice principles for development (CIEEM/CIRIA/IEMA 2016)

4. Our call on developments

'Good development...'

- Is supported by early presentation of well-informed, competently produced and fully independent ecological impact assessment(s); and following stringent application of the biodiversity impact 'mitigation hierarchy' (NPPF⁴ paragraph 175(a)), any remaining biodiversity losses are unerringly and consistently compensated as net gains evidenced through the 'Defra Biodiversity Metric';
- ...Meets local policy requirements echoing NPPF paragraphs 170: "Planning policies and decisions should contribute to and enhance the natural and local environment by.. minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures"; and 174: "To protect and enhance biodiversity, plans should.. promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity";
- ...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 and creation, and priority species recovery projects, both on and/or off-site;
- ...Co-incidentally provides for adequate Green Infrastructure (GI) 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;
- ...Features original and innovatively-designed biodiversity enhancements within the built environment, including green/brown roofs & walls, bespoke species' microhabitats, wildlife under/over-passes ('green bridges'), sustainable drainage & flood alleviation measures adapted as wetland habitats;
- And takes long-term responsibility for the funding, management and monitoring of biodiversity conservation mitigation & compensation projects.

'Bad development...'

- Wilfully extorts planning decision-making in ignorance of all relevant biodiversity constraints & opportunities, thus under-valuing the Defra Biodiversity Metric;
- ...Severs or sterilises existing or potential opportunities for enhancing wildlife habitat connectivity, especially within or proximal to BOAs;
- ...Or is designed at a density whereby it is impossible to incorporate adequate on-site Green Infrastructure, and therefore to manage any elevated impacts on sensitive, adjacent biodiversity from both formal and informal recreational use.

As human populations continue to grow, additional residential development and its related infrastructure remains inevitable and will consequently continue across Surrey for the foreseeable future. The Trust proposes that the best way of protecting nature in the face of this challenge is to engage positively with the development and planning sectors, whilst preserving our mission to conserve all wildlife throughout Surrey.

⁴ See: National Planning Policy Framework, Chapter 15 (DCLG, 2019)