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By email to robert.jenrick.mp@parliament.uk

House of Commons
London
SW1 0AA

5 August 2021

Dear Robert Jenrick,

I am writing to request your support for recognition of the impacts of environmental constraints on the delivery of new homes.

Surrey Heath Borough lies in the north west corner of Surrey and adjoins the counties of Berkshire and Hampshire. The north and east of the Borough are mainly areas of countryside and heathland. The western half of the Borough is mainly urban in character. Nearly half of the Borough is designated as Green Belt and all residential development in the Borough is affected by the Habitat Regulations due to the proximity of the Thames Basin Heaths Special Protection Area. The environmental constraints in the Borough result in a significant impact on the ability to accommodate large levels of new residential development.

The standard method for assessing housing need fails to take account of the limiting impacts of significant environmental constraints on the Borough's ability to deliver more new homes. The standard methodology is in effect the use of a mathematical calculation which takes no account of proper planning issues. This mathematical calculation results in an identified need for 327 homes per year, a cumulative 6,200 new homes over the Local Plan period up to 2038.

Borough Councils are best placed to know the extent of local constraints and the availability of land that would enable new homes to be built. Significantly, approximately 81% of Surrey Heath is within the Green Belt, Countryside Beyond the Green Belt and/or the Thames Basin Heaths and its 400m exclusion zone.

The Thames Basin Heath Special Protection Area alone accounts for 23% of the Boroughs area, with a further 19% in the 400m exclusion zone around the SPA where

no net new residential development is permissible due to it giving rise to adverse impacts on the integrity of the Thames Basin Heaths SPA. These constraints significantly impact upon the Borough Council's ability to sustainability accommodate future development. In addition, all new homes must provide mitigation to ensure no likely effect on the Thames Basin Heaths SPA in the form of provision of or contributions to, Suitable Alternative Natural Greenspace (SANG). Opportunities for find land for new SANG in the Borough are limited providing a further constraint on development.

The Borough Council requests that the standard methodology for calculating housing needs sets out a clear acknowledgement that where Boroughs are significantly environmentally constrained this must limit the number of new homes which it is appropriate to plan for in a Local Plan. Furthermore, it is requested that this is explicitly set out as an appropriate justification for the delivery of a level of new homes below the standard methodology figure, as such an approach would support the delivery of a level of new homes commensurate with environmental constraints and protection of the Green Belt.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Alan McClafferty', with a stylized flourish at the end.

Cllr Alan McClafferty
Leader of the Council