

8Hii.1 CPRE Surrey (7152)

SOUTH EAST PLAN EXAMINATION IN PUBLIC

EIP 8H London Fringe Sub Region Statement by CPRE Surrey 7152

8Hii HOUSING AND GREEN BELT

8Hii.1 Is the proposed housing provision for the sub-region at the most appropriate level, having regard to social, environmental and economic consideration (Policy LF2)?

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- 1.1 CPRE Surrey cannot comment as regards the Sevenoaks District of Kent.
- 1.2 We assume that the Thames Basin Heaths SPA strategy will not require any revision/ redistribution of the housing allocation already made by SEERA for the South East Plan. It has to be recalled that no less than 6 Districts in Surrey within the London Fringe Sub-region are currently affected directly by the TBH outcome (Policy LF11). It would be unreasonable to require the remaining districts, many already at capacity, to absorb more.
- 1.3 CPRE Surrey also wishes to point out that because of the division of Surrey into 4 elements by the Sub-regional Strategy, housing allocation has been made much more complicated. 4 Districts in Surrey and 1 in Kent have only part but not all of their area within the Sub-region. We doubt if this extra complication can be justified in terms of additional benefit.
- 1.4 We support the allocation that has been made, which is based on the best evidential base and urban capacity studies available. We assume that regular monitoring will ensure that if any of the district councils come across major problems or environmental constraints such as the recent TBA problem, the targets can be reassessed. We would object very strongly to any increase in these levels if this would result in building on Green Belt land.
- 1.5 It remains an objective of the South East Plan to ensure that all development is sustainable. Thus, development should be directed towards existing urban settlements rather than stand alone open sites with poor transport links. The Green Belt has a range of purposes, including urban regeneration – an important requirement in this area.
- 1.6 Although the housing figures appear about right, there is concern at the mismatch with employment forecasts which, as we have said elsewhere, are too high and will lead to pressures for more residential development or increased inward commuting.

- 1.7 There is obvious concern at the shortage of affordable housing in the Sub-region but we do not feel that the deficit can be met solely by a proportion of new market housing. Other solutions are required to provide social and key worker accommodation. The latter is essential if a correct balance is to be struck with the provision of local services. Moreover, it is now accepted that the provision of additional housing will not reduce house prices to any extent –they are currently falling slightly in the South East despite high levels of new construction.

8Hii.2 CPRE Surrey (7152)

8.Hii.2 Is the target that 40% of new housing should be affordable justified and appropriate (Policy LF3)? Is it capable of being achieved?

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- 1.1 .CPRE Surrey supports Policy LF3 and the associated explanatory text.. This is in line with Chapter 5 of Section D3 on page 85-86 and Policy H4.
- 1.2 The main crisis in housing terms in the London Fringe Sub-region is the provision of insufficient affordable housing to meet local need. We do not believe that this crisis is being met by the present system of funding. Additional finance is needed to tackle this issue and make a significant contribution.
- 1.3 We are opposed to the development “threshold” concept. This is particularly damaging to Surrey where windfall sites are generally small in size. We therefore welcome the changes laid out in this respect in paragraph 29 of PPS3. We endorse the statement made in paragraph 2.9 on page 294. An extract from this reads as follows:
“contributions towards affordable housing should be sought from all new residential development, either on-site or through a financial contribution to provision elsewhere”
- 1.4 We support the suggestion that there may be a case for requiring contributions from new non-residential development which requires additional labour, (paragraph 2.9).
- 1.5 CPRE Surrey considers that a target of 40% of new housing being affordable is both justified and appropriate, although are concerned that the figure may deter some landowners from releasing land, particularly if infrastructure payments are high. The target will require some sites to be developed at levels higher than 40% so that this average is achieved. However, we question whether expressing the tariff as a percentage is entirely satisfactory, bearing in mind that the need exists regardless of the scale of market housing. Moreover, there will be variations of need within the sub-region, for example in rural “exception” areas where 100% is acceptable.
- 1.6 We note that although the figure is higher than the 35% required for the region as a whole, there is no percentage breakdown or guidance on the proportion to be social housing (as given in Policy H4). Presumably this is being left to the districts and housing association advisers.

8Hii.3 CPRE Surrey (7152)

8Hii.3 Is the proposed apportionment of the overall housing provision to the Districts at the most appropriate level, taking account of socio-economic and environmental factors (Policy LF2)?

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- 1.1 CPRE Surrey accepts and supports the apportionment as it has been based on the best evidence available. We do not consider a case has been made for a any change and would strongly object to any government proposals for increased allocations for this sub-region because of the environmental constraints, congestion and inadequate infrastructure.
- 1.2 We have stated in response to question Hii.1, that we would object strongly if, for any reason a district is unable to reach its target, other districts would be obliged to make up the balance. As Roger Tym has stated, the London Fringe is one of the areas near its full environmental capacity. Should this be proposed, there should be a full environmental assessment and public consultation. We are aware that it has been suggested by the government that Harlow, for example, should absorb more housing than originally proposed in the East of England Plan.
- 1.3 We support the overall strategy of the South East Plan as reflected in its support for the Green Belt, Strategic Gaps the Surrey Hills AONB, and protection of landscape character). We welcome Policy CC12 with its emphasis on Character of the Environment and Quality of Life. However, we consider that overall the balance of the Core Strategy is wrong, and insufficient emphasis is given to the environment, compared with the economy and housing. Many of the cross cutting policies are given little weight at the sub-regional level. We do not accept that the Barker Report is government policy or that it should have any undue influence on decision making at this stage.

8Hii.4 CPRE Surrey (7152)

8Hii.4 Has the sustainability of developing Green Belt land for housing and mixed uses been properly considered?

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- 1.1 We have a major problem with understanding this question. The South East Plan does not recommend the use of Green Belt land for development. It would not have reached this decision without careful appraisal of relevant data, consideration of government policy (PPG2) and careful assessment of public opinion, all of which must be material considerations. If it did, we would object most strongly and we believe that the great majority of the public would also find such a proposal unacceptable. We appreciate that local councils may put forward proposals to make minor modifications to boundaries but this would be subject to full public consultation as part of the LDD process.
- 1.2 Perhaps the most distinctive feature of the London Fringe Sub-region is the Metropolitan Green Belt itself and its success as a land use policy tool in this part of the country since it was introduced over 50 years ago. PPG2 makes clear that permanence is an essential feature of Green Belt designation. The draft South East Plan was prepared using PPG2 as guidance and the Government continues to support it so this must be the policy basis upon which the Green Belt is defended. We agree with Policy CC10a in support of the Green Belt.
- 1.3 PPS3 has replaced PPG3 and so this has to be considered as the relevant Government guidance with regard to housing. The South East Plan will therefore have to take this into account but we do not see any weakening of support for the Green Belt in this document.
- 1.4 The Green belt in the London Fringe Sub-region is very precious. Apart from giving settlements identity by preventing coalescence it provides, amongst other functions, the opportunities for leisure and recreation by London and Surrey residents. Once lost, it is gone for ever. The suggestion, sometimes put forward, that compensation can be given by extending the Green Belt on the outer edge, does not create more countryside and makes journeys to it longer.

8Hii.5 CPRE Surrey (7152)

8.Hii.5 Is the proposed link between housing provision and infrastructure provision reasonable and capable of being implemented (Policy LF5)?

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- 1.1 As far as we are aware, no study has been undertaken for the London Fringe Sub-region which covers the infrastructure cost per house as calculated for West Sussex by Richard Walker.
- 1.2 The Implementation Plan is, at present, one of the least convincing elements in the South East Plan with very few estimates of infrastructure cost. It is particularly inadequate when one comes to consider green infrastructure. (We understand that data has been submitted since the EiP commenced, but even so we are concerned that the full infrastructure costs have not been calculated)
- 1.3 CPRE Surrey is not in a position to comment in detail on the relationship between housing and infrastructure provision. There is a large infrastructure deficit that needs to be overcome before any new ambitious growth plans are adopted which will further increase pressure. This is a consistent thread throughout the South East Plan. This Examination has already made clear that severe problems exist in many different sectors including water, sewage treatment, mineral extraction, traffic congestion, health provision, and public transport. Some sites which might be considered for development will not be viable to develop where essential infrastructure provision is too costly.
- 1.4 Given limited funding provision, questions of priority become critical and increasingly difficult to assess. We fully support Policy CC5, especially (iii) which requires that the necessary infrastructure required to serve the development is available or will be provided in time. Unfortunately, although this may be satisfactory with major new developments, it is difficult to achieve with the incremental growth experienced over much of the London Sub-region where the majority of development is in the form of small windfall sites. A tariff system may assist but will not provide for substantial schemes such as hospitals, and subsidised bus services.
- 1.5 We therefore conclude that the case for significant additional housing development is fatally compromised because of the existing wide ranging infrastructure deficiencies. We consider that LF5 is 'reasonable' but has no teeth and we have grave doubts on whether it can be successfully implemented.