

[ Cllr Sinead Mooney,  
Cabinet Member for Children & Families  
Surrey County Councillor for Staines,  
Woodhatch Place,  
11 Cockshot Hill,  
Reigate,  
Surrey,  
RH2 8EF. ]

If calling please ask for:

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Our ref:

Your ref:

[ ]

Date 7<sup>th</sup> March 2023

Dear Councillor Mooney

Thank you very much for sending us the draft “A Housing, Homes and Accommodation Strategy for Surrey” for our consideration and views. This has now been discussed in Tandridge District Council’s (‘TDC’) Planning Policy Working Group meeting on 24<sup>th</sup> February and agreed in consultation with the Group Leaders and Chair and Vice Chair of the Planning Policy and Housing Committees.

We are particularly encouraged to read that Surrey CC are endorsing and supporting the need for public sector landowners to accept that disposal of land cannot only be seen through a lens of maximizing commercial return, but on achievement of wider objectives and community values to facilitate the supply of new homes for social rent and therefore supporting the provision of affordable homes.

However, TDC has real concerns about the content of other parts of the Strategy.

One of these concerns is how the strategy, if adopted, will be perceived and used, particularly in the presentation and determination of planning applications and the examination of local plans. There is repetitive reference throughout the document to a “housing crisis” in Surrey. The adopted strategy will be a material consideration in the determination of planning applications and appeals and could be introduced as part of the evidence base at local plan examinations. TDC would not want its decisions on planning applications, evidence at appeals and evidence at the Local Plan examinations undermined by such a document.

Another concern is that Tandridge is predominately a rural district made up of 94% Green Belt with no large towns or main centres. Therefore including high density “20 minute Neighbourhood Principles” into our local policies would significantly and detrimentally change the character of our small towns and would not be supported. The Government, in its Levelling-up and Regeneration Bill: reforms to national planning policy, accept that building at densities significantly out of character with the existing areas may have an adverse impact on an area and that it is important to be able to plan for growth in a way which recognises places’ distinctive characters and delivers attractive environments which have local support.

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The question also has to be asked is if this an appropriate time to be bringing forward a strategy that refers to a housing crisis in Surrey? The statements from the Secretary of State to DLUHC in December 2022, his letter to MPs and then the published consultation on changes to the National Planning Policy Framework all signal changes relating to how local plans are prepared and housing needs met in individual districts. Surrey District Councils all have Green Belt and sometimes Area of Outstanding Natural Beauty constraints applying in their districts. These are constraints that central government seems to be signalling will not be required to be set aside to meet an individual district's housing needs. There are mixed messages about central government's ultimate intention for the delivery of housing and the changes that will eventually be confirmed. In TDC's view, this is not the appropriate time to be embarking on a countywide housing, accommodation and homes strategy for Surrey.

At Tandridge we already have our own Affordable Housing programme. We already identify Council owned sites for development and redevelopment and have a very successful programme of building affordable homes for our residents. For example, there are currently three planning applications for Council housing awaiting determination and two others with planning permission where development is to commence shortly. We are also currently purchasing a site for council houses from the MoD in Caterham. The MOD has given us first refusal as it is public estate land to enable us to deliver more affordable housing. We would like to request that Surrey CC adopts the same approach.

As the local planning authority, we believe that we are best placed to determine our local policies, housing need and where development should take place. Working at a local level, we know our area the best and already take into account land supply, constraints, social issues, infrastructure requirements, population demographics and residents views. We already work with other D&B's and partners to provide the best outcome for our residents and are always willing to open dialogue and work together and have done so very successfully.

In addition, we believe it would assist with transparency and consistency going forward if the D&Bs, which as the planning authorities have the relevant expertise, are responsible for determining applications on County Council land. These are currently subject to Regulation 3 which permits a local authority to make an application to itself for planning permission and then determine that application. This causes confusion among the public and a perception of lack of transparency and we would like to request that the County Council delegates the power to D&Bs.

Taking into consideration the points above, Tandridge District Council will not be taking part as a partner in the "A Housing, Homes and Accommodation Strategy for Surrey". We also request that this position is noted in the final document.

Yours sincerely,

Cllr Catherine Sayer  
Leader of Tandridge District Council.  
Council

David Ford  
Chief Executive of Tandridge District  
Council