



Strategic Land Availability Assessment Update 2025

Appendix 9 – NPPF 2025 implications



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NPPF 2024 implications for Housing Land Supply

- 1.1. The base date of the SLAA update 2025 update is April 1st 2025. The SLAA 2025 has been prepared as evidence to support the Surrey Heath Local Plan, submitted to the Planning Inspectorate in December 2024. In December 2024, just after the Local Plan had been submitted, the Government published a revised National Planning Policy Framework ('NPPF 2024'). In line with transitional arrangements in the NPPF 2024, the Local Plan will be examined in accordance with the National Planning Policy Framework ('NPPF') 2023. Therefore, the SLAA 2025 update has been prepared in accordance with the NPPF 2023.
- 1.2. In outlining the implications of the NPPF 2024 it is relevant to note that it sets out new requirements for determination of housing land supply.
- 1.3. The NPPF 2024 deleted the requirement to demonstrate four years' worth of housing supply that applied to those authorities which have an emerging local plan that has either been submitted for examination or has reached Regulation 18 or Regulation 19 (Town and Country Planning (Local Planning) (England) Regulations 2012) stage.
- 1.4. The NPPF 2024 at paragraph 78 requires Local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their local housing need where the strategic policies are more than five years old and that this should include the addition of a minimum buffer of 5%. Whilst higher buffers are set out for specific circumstances at 78b and 78c of the NPPF 2024, this does not currently apply to Surrey Heath. It is relevant to highlight that the adopted Core Strategy and Development Management Policies Local Plan is more than 5 years old.
- 1.5. Under NPPF 2023 the Surrey Heath Local Housing Need figure is 321 dwellings per annum. With an adjustment to take account of unmet need from Hart which forms part of the Hart adopted Local Plan (41 dwellings per annum), which applies up until 2032, the housing need figure reduces to 280 dwellings per annum, or 1,400 dwellings over five years.
- 1.6. The Local Housing Need figure under the NPPF 2024 and the new standard method is identified as 684 dwellings per annum. Applying an adjustment to take account of supply from Hart which forms part of the Hart adopted Local Plan (41 dwellings per annum), this reduces to 643 per annum, or 3,215 over five years.
- 1.7. Based on a supply of 2,107 homes identified by the Council in the Five Year Housing Land Supply position statement, compared to the requirements of the NPPF 2024 the Council is currently unable to demonstrate a five-year housing land supply for the purposes of planning application determination. The five-year housing land supply is 3.12 years (calculation set out in table below).



Stage	Calculation	Category	Result
A	Standard method	Annual Local Housing Need	684
B	$A * 5$	NPPF 2024 Housing Need Requirement (1 April 2025 - 31 March 2030)	3,420
C	$B - 205$	Adjustment for Hart District Commitment to Unmet Need	3,215
D	$C \times 1.05$	Application of 5% buffer	3,376
E		Housing supply (1 April 2025 - 31 March 2030)	2,107
F	$(E / D) * 5$	Five-year housing land supply under NPPF 2024	3.12 years

- 1.8. However, the NPPF 2024 at paragraph 7.8 sets out that planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies. The Surrey Heath Local Plan, in line with transitional arrangements, will be examined in accordance with the National Planning Policy Framework ('NPPF') 2023. Therefore, at the point of adoption, the Housing requirement in the Surrey Heath Local Plan 2019-2038 would apply. Further details of this are set out in the SLAA 2025 Main report and in the Appendix 10 Five Year Housing Land Supply Position Statement 2025.
- 1.9. It is important to note that a number of other changes were introduced in the NPPF 2024, most notably changes to the approach to Green Belt. The implications of this have not been considered in the SLAA 2025 methodology, however the supply identified in the SLAA is likely to be a conservative assessment of the number of homes which will be delivered in Surrey Heath as a result of the NPPF 2024 changes.

