

Response to Guildford Borough Council Draft Local Plan

Submitted by Sir Paul Beresford, MP for Mole Valley

Submitted: 21 September 2014

Sir Paul Beresford MP
House of Commons
Westminster
London
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Acknowledgment: I am delighted to acknowledge the huge number of constituents and constituency groups and Parish Councils who have answered my call for residents to register formal objections to this Local Plan. The wave of letters and emails has been heartening while many considered and salient points have been made – I have striven to reflect as many of these as possible in the following document.

Overview

Introduction

The Draft Local Plan put forward by Guildford Borough Council has been one of the most important and most contentious issues involving the Guildford Wards of the Mole Valley Constituency that I, as the Member of Parliament for Mole Valley, have engaged with this year. Thousands of my constituents have registered their deep and fundamental objections to what is being proposed both with me, my Conservative Councillors and with Guildford Borough Council. In this submission I cannot and will not attempt to re-emphasize each of the many site specific objections which have been brought to my attention – these are well known to the Council and need no further underscoring from me. In addition I hope that the enormous weight of public objection will compel the council to do the right thing and remove these sites from the Local Plan at this stage thus making further comment unnecessary. However it is of deep concern that there was little or no positive response to the concerns expressed at the initial pre- Draft Plan consultation. In contrast the sudden inclusion a site in West Clandon for a secondary school, apparently without background research or consultation with Surrey County Council, the LEA, indicates a cavalier approach.

I recognize and applaud the detailed responses on individual sites that are and will be submitted by the Parish Councils, local groups and individuals. Hence I will not try at this stage at least to express concerns on these many sites. It is more appropriate to seek to address some of the broader problems in the compiling of this plan has been compiled. These include the use of incorrect housing projection figures, the failure to consider the possibility of high rise developments and the failure to seriously investigate windfall sites as a means of easing pressure on Green Belt land. This catalogue of errors and omissions has led to a situation in which the Local Plan as presented has no detectable support from Guildford residents and has managed only to anger and worry so many of those who stand to lose the unique and valuable rural village lifestyle they currently enjoy in the Mole Valley Wards of Guildford Borough

The Consultation Itself

Many of the constituents who have written to me have highlighted not only the destructive and poorly judged contents of the Local Plan but also the way it has been presented and the way feedback to it has been collected. I believe that this level of dissatisfaction is most clearly shown by a recent survey of Parish Councils undertaken by the newly formed Guildford Parish Forum. In this survey they asked 20 out of 22 Parish Councils (2 not being contactable) a series of questions on the Local Plan and I believe the results speak for themselves.

In the first instance 16 out of 18 Parish Councils found the documentation associated with the Local Plan to be either 'far too complex' or 'too complex'. This is a serious point which constituents have made to me time and again – it is not possible for a consultation to be meaningful if the documentation provided is so byzantine and lengthy that only the most dedicated and time rich individuals can make a reasonable attempt at digesting and commenting on it. Even worse, this survey reveals that only **2 out of 19** responding councils said that they felt the information provided by Guildford Borough Council had been impartial. This is utterly damning and would suggest that Guildford Borough Council have managed, through their handling of the Local Plan process to create such a level of distrust that only a

substantial rewrite and a consultation on another “Draft Local Plan”. Is required. This new or Second Draft Local Plan should follow reconsideration of the objections in the current consultation.

Finally, Parish Councils were asked if they felt Guildford Borough Council had responded positively to public criticism – 100% said no. I have experienced a similar unanimity in the letters I have received on this matter. Many hundreds, even thousands, have written to object – not a single resident has written to inform me of his support for what Guildford Borough Council is proposing.

The Role of National Policy

In determining Housing Figures

One of the founding myths promoted was the premises that if in the Guildford Local Plan sufficient housing numbers were not catered for by the council itself, then Whitehall would overturn any locally produced plan document and impose a far more arbitrary and destructive one from above. This view has been expressed by both Council Leader Cllr Stephen Mansbridge and former Executive Member for Planning Cllr Monika Junega on a number of occasions. I have said publically, many times, that this is incorrect and does not match up with long and frequently stated government policy on both the issues of Green Belt protection and promoting localism in practice as much as possible.

In his letter to me of the 7th February 2014 Nick Boles commented that “*This government does not impose top down housing figures on local authorities, or ask councils to build more homes than are needed.*”¹ This is a position which has been reiterated in subsequent letters and should give lie to the suggestion from Guildford Borough Council leadership that national policy has brought us to the position we find ourselves in today. The Secretary of State for Communities and Local Government Eric Pickles underlined the point that housing need is determined locally in a letter sent to me on the 4th August in which he stated “*Our National Planning Policy Framework asks local authorities to plan to meet locally assessed housing needs in full. It is up to each local authority to decide how best to meet it’s objectively assessed housing need...*”²

The stark reality is that Guildford Borough Council have set this course for themselves - and to now seek to blame central government is nothing short of outrageously disingenuous on the part of council leaders – who do not speak for the overwhelming majority of Conservative councillors from wards within my constituency.

On The Protected Nature of Green Belt Land

It is actually on the issue of Green Belt protection and not housing numbers where national policy as defined through the NPPF (National Planning Policy Framework) is more rigid. In his letter to me of the 7th February Nick Boles, the then Planning Minister, wrote that “*The National Planning Policy Framework provides strong protection [for Green Belt Land]: it states that permanence is an essential characteristic of Green Belt, that inappropriate development in Green Belt should not be approved except in very special circumstances,*

¹ See Appendix A

² See Appendix C

*and that a Green Belt boundary may be adjusted only in exceptional circumstances...*³ This assurance was reiterated in a second letter to me of the 18th June in which the Minister stated with equal clarity *“Paragraph 14 of the Framework clearly states that, when Plan-making, Local Plans should meet objectively assessed needs, unless specific policies in this framework indicate development should be restricted; these policies include the Green Belt and Areas of Outstanding Natural Beauty”*⁴

As with the issue of housing figures mentioned above, a great deal has been made by the same Councillors of the supposed willingness of central government to come in and concrete over much of the Green Belt if Guildford Borough Council does not produce a sufficiently development orientated Local Plan. This is a point of view totally detached from the reality of what legislation and specifically the NPPF allow. In his letter of the 4th August Eric Pickles writes that *“...as we clarified earlier in the year, the inspector – acting independently though in my name – may recommend modifications to a Local Plan only if requested to do so by the local authority [emphasis added]...”*⁵ This is quite clear – the threat of central government intervention which Cllrs Mansbridge and Junega have tried to present to Guildford residents as being some sort of Sword of Damocles hanging over their heads, is simply not credible. Now that this has been clarified beyond a reasonable doubt the whole rationale for this Local Plan should be overturned and the process ought to start afresh with a frank and honest discussion about what the housing needs in the borough actually are – as well as a willingness by the Council Leader and his subordinates to stand by their own decisions and not blame a non-existent Whitehall diktat for their own desire to build on Green Belt land.

³ See Appendix A

⁴ See Appendix B

⁵ See Appendix C

Housing Figures

ONS Figures

The number of houses Guildford Borough Council are planning to build are directly linked to Office of National Statistics figures which offer a projection of how population growth is most likely to progress in the years ahead. It has recently emerged that the Office of National Statistics has actually revised downwards its projections for Guildford by around 5,000 people. This has clear and immediate implications on the Local Plan and the scale of development necessary – but no adjustment has yet been made. The Guildford Society estimates that this change would result in around 2-300 less homes being needed and so clearly the Local Plan cannot be accepted as written until this has been factored in.⁶

In addition, these estimates have been derived from a five year period which saw an atypical level of population growth in Guildford and so cannot (or at the very least *should not*) be used as a basis for assessing long term housing need in the Borough. I would suggest that since these projections are the basis for the entire Local Plan the council would do well to undertake broader and deeper research into what the approximate future population of the borough will actually be.

University Housing

Earlier in the year one of the most significant points which I pursued, along with Anne Milton MP for Guildford, was the question of whether student housing could be included in a local authority's housing targets. I met with Nick Boles personally to discuss this point and following this meeting received written confirmation that "*Yes. Student housing makes a significant contribution towards housing supply by taking pressure of demand for housing stock. This government has clarified guidelines to make it clear that local authorities can include student housing in the calculation of, and the monitoring against, local housing needs, regardless of whether they are communal or sited on a university campus.*"⁷ This is another very important point which had not been fully appreciated at the time the Local Plan was put together and it is vitally important that the council consider this development and reduce the planned number of new houses accordingly.

In addition I would note that it is increasingly starting to look as though estimates on the future size of the student population are not correct either – a figure of 1:6 had been suggested where as in reality 1:4 would appear to be a more accurate estimate. The implication of this change on final housing numbers should be obvious and as above, the council has an obligation to alter the Local Plan to reflect this changing intelligence.

⁶ <http://www.guildfordsociety.org.uk/flaw-in-GBC-local-plan-housing-number.html>

⁷ See Appendix 1

Windfall Sites

Regrettably there would appear to be little or no realistic consideration in the draft Local Plan given to the use of windfall sites – i.e. sites which become available for development with very little or no prior notice. This is significant as much of the recent development in Guildford Borough has been driven predominantly by the use of windfall sites – with no evidence that this trend will reverse itself in the near future. By not acknowledging this in their Local Plan, Guildford Borough Council are once again overestimating the final number of houses which will need to be built – with the damaging effects of this overestimation being felt in our rural villages. The claim that there will be few if any new windfall sites flies in the face of recent history and the whole premise of Windfall Sites - that is that they are not predictable.

It is of particular note that the draft Local Plan appears to have no provision for the inclusion of windfall sites which see commercial spaces returning to or being converted for residential use. This is significant as the Planning Inspector in neighbouring Reigate & Banstead has already acknowledged such sites as a valid part of the Local Plan there. In addition no provision or estimate seems to have been made for currently vacant houses coming back into use.

To give an exemplar of how windfall sites can change development figures, Ockham Parish Council has reported that in its Parish use of windfall sites has driven up housing development figures by 5% exemplified by the conversion of a restaurant into a unit of 7 flats. The Parish Council goes on to correctly identify that this is likely to be a common occurrence across the entire borough.⁸

It is therefore a matter of profound concern that Guildford Borough Council has failed to consider historic trends for windfall sites and write these into the Local Plan accordingly as (to take the Ockham figure as a benchmark) even a 5% reduction in housing figures would save at least some of the Green Belt land the council currently has marked up for development. This is not to suggest that windfall sites can be considered as a major alternative to new housing development – but it is absolutely true that these sites have a significant impact on housing development levels around the borough and this is at present being ignored.

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<https://getinvolved.guildford.gov.uk/consult.ti/IOSS.Q.2013/viewRepresentation?nextURL=%2Fconsult.ti%2FIOSS.Q.2013%2FlistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D4103156%26repid%3D%26partId%3D4104084%26repidstyle%3Dexact%26repstatusList%3DM%26repTypeList%3D1%252C2%252C3%26lastModifiedDate%3D%26searchterm%3D%26mailmerge%3DN%26searchchildren%3DN%26hasAgent%3D-%26pageaction%3D%26%26sort%3Dsubmitdate%26dir%3Ddesc%26startRow%3D11&repid=3661653>

Industrial, Commercial sites and Higher Rise

A serious rethink on the Draft Plan suggested industrial and commercial sites is required in response to some of the objection. The trend commenced 2 decades ago of mixed sites such as retail, with offices above and accommodation above the offices does not appear to have been seriously considered. The resistance to high or higher rise buildings in central Guildford in particular is notable. Examples of quality and architecturally imaginative high and high rise buildings abound. Currently there are innumerable such buildings built and under construction south of the Thames In south west London.

Logistical & Infra-structural Challenges

The loss of our Green Belt land to the sort of development proposed by the Local Plan would be a very great shame, to put it mildly. What would be equally unfortunate would be the pressure that such development would place on infrastructure and facilities which currently service the small villages in the west of the borough.

This is another very sound reason that the council should look again at larger high rise developments in Guildford itself. Such developments would have the two principal advantages - being near to the ample services and facilities of central Guildford while at the same time being large enough in scope to ensure that any infra-structural challenges can have their solutions built into the development. The same cannot be said for the numerous small developments proposed in the current draft Local Plan the great majority of which will come without any attached infrastructure solutions to the raft of problems that they will create.

Roads

In many of the villages earmarked for further development the roads are already in a comparatively poor state. As one resident put it in a separate response to this consultation, "*The council has signally failed to properly maintain the roads in the villages of East and West Horsley*" With the road network in a questionable state with only the current number of users, it seems entirely reasonable to assume that certain stretches of road would deteriorate even faster in the event that hundreds of new residents begin to use them on a daily basis.

Another important problem which does not appear to have received due consideration from the authors of the draft Local Plan is that many of the roads which would be required to take on hundreds of new users are extremely narrow (The Street in West Horsley is one example) This means that when heavy traffic builds up or when lorries or tractors pass

through, these roads can become nothing short of dangerous. This also applies to corresponding stretches of pavement, which can become particularly dangerous for wheelchair users or those pushing prams etc. In the case of many roads like this there is no prospect that either the road itself or the pavement could possibly be widened – and so to knowingly increase the amount of traffic in these areas would appear to be the height of irresponsibility.

Facilities

As I have been arguing for some time, the reality is that key local facilities are not equipped or prepared to deal with the significant increase in population that this Local Plan would bring. The rural villages often share a single facility such as a medical centre and these are busy even now – constituents have related numerous accounts to me of waiting weeks for a non-urgent appointment. The same is also true of local schools, at which places are getting increasingly hard to come by. Parking space, another commodity already at a premium, will become a major problem following any significant new build of housing in the small villages in the Mole Valley wards of the borough. I am particularly concerned that as the limited available spaces would become perpetually full, certain older residents (and we should not forget that these villages have many older residents) would find themselves unable to easily access shops, friends and more importantly doctors, dentists and chemists.

Sewerage

The concerns surrounding adequate provision of sewerage are similar to those made about roads. It will be considerably easier in both planning and financial terms to factor the need for new sewerage into development plans for a large high rise block of flats than it will be for those pertaining to a scattering of single properties spread across the most rural parts of the borough.

This is a problem which must be handled with the utmost care as I have already had constituents reporting to me that the sewerage capacity in villages such as Ripley is stretched to capacity, with heavy rain leading to raw sewage flooding out of the sewers and into resident's gardens. I would suggest that Guildford Borough Council has either not considered or has wilfully ignored this problem otherwise they would not be proposing to add significant extra strain to a limited capacity rural sewerage system already operating at something close to peak capacity. I do not accept the oft quoted premise that a levy on those constructing on these sites will enable provision. A large proportion will fall on local taxpayers for schools for example, on utility charges and national government such as the NHS.

Conclusion

I have seen very little written in the draft Local Plan which addresses any of these shortcomings and feel that taken together they present an insurmountable list of problems which should prompt a total reconsideration of where Guildford will focus its development for the lifespan of its next Local Plan. Clearly these issues are eased or far more easily solved by shifting the focus to central Guildford and as has already been mentioned I do not believe this has been given anything like due consideration.

Impact on Wildlife

While it is not something which receives a great amount of attention from many of the constituents who have contacted me to object the Local Plan, concerns as to the damage which would be done to local wildlife should the Plan proceed as written are actually extremely serious and deserve mention in any conversation about the shortcomings of what Guildford Borough Council are proposing.

A number of concerned naturalists have expressed the view that many species (the Dartford Warbler and The Red Kite to name but two) currently found in and around our Green Belt are already highly vulnerable and the additional pressure from loss of habitat and an increase in the predatory cat population precipitated by an increase in the human population would cause further losses amongst these species.

Section 6.10 on page 43 of the Local Plan states that '*National planning policy does however ask us to take opportunities to enhance wildlife through our Local Plan.*' Clearly this objective is totally incompatible with the resulting loss of wildlife which would result from the Local Plan going ahead in the more rural parts of the borough. It is also important to note here that the draft Local Plan document does not contain or reference any detailed wildlife impact assessments which ought to have been a matter of course in the process of consulting on this plan.

An Alternative Solution - High Rise Development

There has been an acute lack of consideration on the part of Guildford Borough Council when it comes to finding alternative solutions which would reduce or remove the need to build on Green Belt land. Given that building on Green Belt land must be considered as a last resort, the Council would seem to have a clear duty to spend more time considering the feasibility of the many proposals put forward for high rise development in Guildford itself – something which would help to meet housing targets while at the same time ensuring that the unique character and feel of the rural villages is maintained.

One such scheme (*taken at random from a list of several I am aware of*) calls for extensive redevelopment around Guildford Railway Station which would provide around 450 new homes⁹ – once again, this is something which would significantly alter the final recommendations of the Local Plan and must be considered before any final decisions can be made. This sort of development will serve to provide exactly the sort of accommodation which young professionals and couples are looking for – small to medium size high density flats. This is the sort of housing which has been provided in places such as south west London (as mentioned above) as the council there has sought to manage a growing population - with great success. There can certainly be no doubt that this sort of development will be more welcomed by the Borough's young people than an equivalent number of detached houses scattered across small villages such as the Horsleys and Clandon.

I have already noted in a previous section the additional advantages which this sort of development would bring in terms of solving infra-structural challenges. I will not repeat the

⁹ <http://www.getsurrey.co.uk/news/surrey-news/150m-bid-transform-guildford-railway-7655474>

arguments here but suffice to say, a focus on redevelopment and higher rise buildings in Guildford itself will offer simplified solutions to a range of logistical, infra-structural and transportation based challenges.

Conclusions

This submission has focussed very much on the overarching strategic problems with the draft Local Plan as it is currently written while trying to avoid being drawn into the 'tactical' level objections to specific site proposals – this is not to say that these objections are not valid only that I have attempted to focus my energies on those areas where I feel most able to influence outcomes and change opinions. Within those areas I suggest the following conclusions and recommendations, which reflect my own point of view and also that of the overwhelming majority of my constituents living in the Guildford Borough area:


- **Legitimacy:** Clearly this Local Plan has no legitimacy in the eyes of Guildford residents – the results of the survey of Parish Councils make this quite plain. A full 95% of Parish Councils surveyed said they did not feel their Parish would benefit from the Local Plan. Clearly GBC cannot proceed in the face of this total dearth of support for their draft and a total reconsideration with far greater engagement with residents is needed.
- **Housing Figures:** The calculations used to work out how much new housing will be needed in Guildford Borough are fundamentally flawed. The provided ONS figures have subsequently been revised downwards, the population growth data used is atypical and the figures on the student population do not appear to be correct. Given that housing figures are the root of a Local Plan from which detailed propositions eventually flow, such a fundamental series of miscalculations leads me to conclude that only a major rewrite or total restart on the Local Plan process will be sufficient at this stage.
- **Shift of Focus:** As outlined above, a shift in focus from building on Green Belt land in and around the villages to a focus on redevelopment and best use of space within Guildford itself is essential. The Local Plan must be redrafted or radically altered to reflect this new strategy which will not only offer the sort of accommodation the next generation will be looking for but also offer far easier solutions to a raft of infra-structural challenges as discussed earlier. After this redraft I believe this second draft should be represented for consultation before a final draft for submission to the Inspector is concluded
- **Openness:** Guildford Borough Council has many excellent Conservative councillors as well as a team of highly competent staff. I have been most unhappy with the way the Executive team in control of the draft Local Plan has tarnished the standing of all these people as they push through this draft Local Plan as quickly and quietly as possible over any protest residents may make. This must stop and residents must be

made to feel involved and engaged with shaping this plan – not merely reading about it after the fact.

- **Honesty:** It behoves the leadership at Guildford Borough Council to acquaint themselves with national policy on planning and the Green Belt (something I have made quite clear in this submission) and not to seek to portray their desire to build on Green Belt land as some sort of last resort foisted onto them by Westminster or Whitehall.

Appendix A

Letter of the 7th February from Nick Boles MP, Minister of State for Planning, to Sir Paul Beresford, Member of Parliament for Mole Valley:



**Department for
Communities and
Local Government**


Sir Paul Beresford MP
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 6 7 FEB 2014

Following the meeting with yourself and Anne Milton MP on 15 January and as requested, please see the below additional information on some of the important matters discussed.

Can student housing be included in a local authority's Local Plan housing numbers?

Yes. Student housing makes a significant contribution towards housing supply by taking pressure off demands on housing stock. This Government has clarified guidelines to make it clear that local authorities can include student housing in the calculation of, and the monitoring against, local housing needs regardless of whether they are communal or sited on a university campus.

The definitions page on our website has been amended to make clear that all student accommodation, whether it consists of communal halls of residence or contained dwellings, and whether or not it is on campus, can be included towards the housing provision in local development plans. Further information is available on the housing statistics definitions page of the Department's website at: <https://www.gov.uk/definitions-of-general-housing-terms>

Student housing will also be eligible for the New Homes Bonus. Over time, councils are also compensated through the local government finance system for the revenue shortfall from the long-standing student council tax exemption.

Meeting housing need

This Government does not impose top-down housing targets on local authorities, or ask councils to build more homes than are needed. We have abolished the last Administration's Regional Strategies. The Localism Act also gives councils more discretion to draw up Local Plans, and the National Planning Policy Framework puts Local Plans in the pole position to determine where development should and should not go.

Localism cuts both ways: it also means that councillors need to take (sometimes difficult and challenging) decisions on how and where to provide the housing that our country needs. The National Planning Policy Framework, therefore, asks councils to ensure that their Local Plans meet the full, objectively assessed needs for all types of housing in their areas. The draft National Planning Practice Guidance on the assessment of housing and economic development needs is available at: <http://tinyurl.com/phvqrgu>

Green Belt protection

My letter to you emphasised the importance we continue to attach to Green Belt as a way to prevent sprawl and encroachment on open countryside. The National Planning Policy Framework provides strong protection: it states that permanence is an essential characteristic of Green Belt, that inappropriate development in Green Belt should not be approved except in very special circumstances, and that a Green Belt boundary may be adjusted only in

exceptional circumstances, using the Local Plan process of consultation followed by independent examination.

The Framework also requires planners to recognise the character and beauty of the countryside, to protect other designated land such as Areas of Outstanding Natural Beauty, to take into account all the benefits of the best and most versatile farmland, and to encourage re-use of brownfield land if not of high environmental value.

Furthermore, our *Planning Policy for Traveller Sites* which is designed to be read in conjunction with the Framework, makes clear that traveller sites are inappropriate development in the Green Belt. The Written Ministerial Statement of 1 July 2013 set out the Government's concern that some recent planning decisions have not accorded the Green Belt the level of protection that was the explicit policy intent of Ministers. It made clear that the single issue of unmet need - whether for conventional housing or for traveller sites - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the 'very special circumstances' justifying inappropriate development in the Green Belt. It revised the appeals recovery criteria issued in 2008 to enable the Secretary of State to recover for closer consideration traveller sites in the Green Belt.

A local authority must have regard to these and all other relevant national planning policies when drafting its Local Plan and when deciding planning proposals that affect Green Belt land. Even where there is no up-to-date Local Plan, the policies protecting areas such as Green Belt and Areas of Outstanding Natural Beauty remain in force. This is made clear on page 4 of the National Planning Policy Framework, in relation to plan-making and to individual decisions.

Local authorities – after discussion with the local community and neighbouring authorities - are best placed to determine the right locations for essential development, having regard to national planning policy as appropriate. Our abolition of Regional Strategies removed the top-down pressure on them to review Green Belt boundaries, and central government does not dictate housing numbers.

Protection of Areas of Outstanding Natural Beauty

The Government does not want to see any more open land developed than is absolutely necessary. We have made it quite clear through the National Planning Policy Framework that we are committed to conserving and enhancing the natural environment. For example, the Framework makes clear that Areas of Outstanding Natural Beauty, together with National Parks and the Broads, enjoy the highest status of protection in relation to landscape and scenic beauty.

Paragraph 116 of the Framework explains that planning permission should be refused for major developments in Areas of Outstanding Natural Beauty except in exceptional circumstances and where it can be demonstrated they are in the public interest. We have not defined 'major development' as this will be a matter for the relevant decision maker, taking into account the proposal in question and the local context.

I hope this letter is of assistance, and please feel free to pass it on to any local residents who may find it of interest.



NICK BOLES MP

Appendix B

Letter of the 18th June from Nick Boles MP, Minister of State for Planning, to Sir Paul Beresford, Member of Parliament for Mole Valley:



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Sir Paul Beresford MP
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18 JUN 2014

Dear Paul,

I welcomed your contribution to the Queen's Speech debate on housing on 5 June. Further to recent discussions, I would just like to take the opportunity to explain the Government's on-going commitment to national Green Belt protection, reflecting what Ministers have regularly told Parliament.

As set out in the Coalition Agreement, this Government is strongly committed to protecting the Green Belt. National policy on the Green Belt is set out in the National Planning Policy Framework, which we published in March 2012, and which broadly reflects long-standing planning policy (previous editions of Planning Policy Guidance 2).

The Framework makes clear that most development in the Green Belt is inappropriate and should be approved only in very special circumstances. Planning guidance, updated in March 2014, also states that unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt.

Moreover, I would note:

- Paragraph 14 of the Framework clearly states that, when plan-making, Local Plans should meet objectively assessed needs, *unless* specific policies in this Framework indicate development should be restricted; these policies include the Green Belt and Areas of Outstanding Natural Beauty.
- Paragraph 17 notes that the core planning principles that underpin plan-making include both protecting the Green Belts and recognising the intrinsic character and beauty of the countryside.
- Paragraph 83 states that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.
- Paragraph 89 does allow for redevelopment of previously developed sites (brownfield land) within the Green Belt, provided it would not have a greater impact on the openness of the Green Belt and the purpose of including land within it, than the existing development.
- Paragraph 80 notes how the purposes of the Green Belt include checking the unrestricted sprawl of large built-up areas, preventing neighbouring towns merging into one another; and assisting in safeguarding the countryside from encroachment.

I have also communicated many of these points on existing planning policy to the Planning Inspectorate. A copy of my letter from March can be found online at: <https://www.gov.uk/government/publications/inspectors-reports-on-local-plans>.

Our abolition of the last Administration's Regional Strategies, including the abolition of the South East Plan, sought to end the unwanted 'top-down' pressure on many local authorities to delete the Green Belt.

I recognise that creating a Local Plan is a challenging process, not least since there is no longer an unelected Regional Assembly at which to point the blame. It is now for locally elected councillors to determine where badly-needed new homes should *and should not* go, in consultation with local residents.

I hope you find this of use, and please feel free to pass this letter to constituents or any other interested party if you feel it would facilitate public debate and scrutiny.




NICK BOLES MP

cc. Anne Milton MP

Appendix C

Letter of the 4th August from Eric Pickles MP, Secretary of State for Communities and Local Government, to Sir Paul Beresford,


Department for
Communities and
Local Government

The Rt Hon Eric Pickles MP
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www.gov.uk/dclg

Our Ref: ER/ER/019169/14

Dear Paul

Guildford Local Plan 04 AUG 2014

Thank you for your letters of 2 July and 17 July about the relationship between assessed housing need and our policy on the protection of Green Belt. I apologise for not responding in time for your meeting as your letter was received in my department after the 23 July.

Our National Planning Policy Framework asks local authorities to plan to meet locally-assessed housing needs in full. It is up to each local authority to decide how best to meet its objectively assessed housing need (and other development needs), whether through a Green Belt review or not. However, there has been no weakening of policy in this area: the Framework is quite clear that permanence is one of the essential characteristics of Green Belt, and it emphasises that Green Belt boundaries may be altered only in exceptional circumstances. If a local authority considers that adjustments to such a boundary are essential, they can be taken forward only through the Local Plan process. We have also made clear that it must always be transparent that it is an authority itself that has proposed reviewing its Green Belt.

Nick Boles' letter to you of 18 June (our reference 016749/14) listed some of the key considerations for Plan makers concerning Green Belt and its protection. It would be for the Planning Inspector at examination to determine whether evidence in support of that particular draft Plan justifies the local authority's position. Each draft Plan faces a rigorous test of its soundness, including the extent to which the draft Plan accords with the Framework and its policies of planning restraint to protect the Green Belt. Thereafter, as we clarified earlier this year, the Inspector – acting independently but in my name – may recommend modifications to a Local Plan only if requested to do so by the local authority, underscoring this Government's commitment to localism in practice.

Plan-making and the examination of draft Plans are often challenging. However, both local authorities and Inspectors are fully aware of our policy intentions and the need to reconcile the community's ambitions for housing and concern for the countryside in line with the Government's expectations. We designed the Framework to be interpreted and applied by Plan-makers to suit the relevant local circumstances. I know that you will appreciate that I cannot comment on Guildford's approach in this respect.

*Yours are
Eric*

THE RT HON ERIC PICKLES MP

