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The Rt Hon Sajid Javid MP
*Secretary of State for Communities and Local
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Thank you for your letter of 22 February about the Housing White Paper and Elmbridge's Local Plan.

To put my answers to your questions in context, in *Fixing our broken housing market* published on 7 February we made it clear that having an up-to-date plan in place is essential to planning for our housing requirements. It will also provide the clarity that communities and developers deserve about where new homes should be built; and ensure that development is planned rather than the result of speculative planning applications. We are also legislating through the Neighbourhood Planning Bill to require all areas to identify and plan for their strategic priorities. Furthermore we have been very clear that all authorities should get a plan in place by early 2017.

With regard to Green Belt policy, local authorities have always had the power to alter boundaries using the Local Plan process, but only in exceptional circumstances. Until now the Government has left it to local plan-makers to say whether exceptional circumstances exist that would justify a Green Belt boundary change. However, in the interests of greater transparency and accountability, the White Paper proposes that a Green Belt boundary may be altered only when an authority demonstrates it has examined fully all other reasonable options for meeting its identified development needs. Such options include making effective use of suitable brownfield sites and the opportunities offered by estate regeneration; the potential offered by land which is currently underused, including surplus public sector land where appropriate; optimising the proposed density of development; and exploring whether other authorities can help to meet some of the identified development requirement. The Housing White Paper also proposes that any impact of removing land from Green Belt should be offset by

improvements to the environmental quality or accessibility of the remaining Green Belt land.

Subject to the responses to the consultation launched on 7 February, we intend to introduce those changes later this year, but we would be disinclined to go even further into listing what might be considered an exceptional circumstance. I would also point out that, even under current policy, planning inspectors have found that compelling evidence of an area's unmet housing need did not automatically justify a significant loss of Green Belt.

With regard to infrastructure, the £2.3 billion Housing Infrastructure Fund announced at Autumn Statement will support local authorities who are ambitious to meet their identified housing need, or go further, and those who have the strategic vision to work together. Local authorities will be able to bid for the grant funding to support delivery of physical infrastructure necessary to unlock housing growth on sites where viability is marginal. Details of how the fund will operate will be set out in due course.

On the standard methodology for assessing housing need, for too long we have not been building enough homes to meet our country's housing needs. Tackling this issue remains complex and solving it requires a radical rethink of our whole approach to home building.

In putting locally-led plans at the heart of the planning system, it is also right that we expect those plans to tackle difficult issues, such as meeting local housing needs. We are aware that plan-making has been slow, expensive and bureaucratic, with arguments about the number of homes to be planned for being a particular cause of delay. This is not helped by the lack of a standard methodology for assessing housing requirements, and the fact that in some parts of the country local planning authorities have not been able to work constructively with other authorities to address cross-boundary strategic issues, including any unmet housing need.

We have listened to the Local Plans Expert Group and their conclusion that a more standardised methodology for assessing housing requirements was one of the most important reforms that could be made to improve plan-making. The White Paper sets out our intention to consult on a new standardised approach which will provide a transparent and consistent basis for the preparation of Local Plans – one which is more realistic about the current and future housing pressures in each place and is consistent with our modern Industrial Strategy. We do recognise the impact on existing Local Plans and the consultation will set out proposed transitional arrangements.

In conclusion I wish to be clear that where authorities have not got an up-to-date plan in place, they should continue to make every effort to do so as soon as possible.

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RT HON SAJID JAVID MP



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... bridging the communities ...

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22 February 2017

Dear Secretary of State

Elmbridge Local Plan

In December, the Council began a consultation on its proposed new Local Plan, following clear advice from the DCLG that, as our evidence base was pre NPPF, our Core Strategy was not considered sound. This consultation set out the strategic options open to the Council to meeting its objectively assessed housing need identified by a Strategic Market Housing Assessment undertaken by the Council early last year.

As required by the NPPF the Council has examined all options for meeting its objectively assessed need. The first option was maximising density in the urban area and the other two options required the amendment of Green Belt boundaries and setting out the exceptional circumstances as to why these were being considered.

The public reaction to these options has been, understandably, significant with many people concerned and often angry about the potential loss of Green Belt. What is disappointing is that despite following the process set by Government in the NPPF, authorities have been put in a position that requires them to examine, and in all likelihood, amend Green Belt boundaries in the drive to deliver more and more new houses with little clarification on the implementation of the Government's Policy Framework.

Given the level of concern raised by our residents, we and our fellow Councillors want to be clear as the Government's policy before we proceed further. It seems to us that statements on the importance of Green Belt have not translated as yet into policies on preparing a Local Plan and that the hard decisions on the release of Green Belt have been left to local authorities. Set out below are a number of issues on which we would like confirmation before we progress our Local Plan.



Green Belt

You have been quoted recently as saying that Green Belt is sacrosanct. Can you confirm that where a local authority has examined the opportunities to deliver more development in the urban area but cannot meet its objectively assessed need in the urban area then it is required as part of the NPPF to consider opportunities to amend Green Belt boundaries in order to meet that need? If this is not the case then can the Secretary of State make it clear that any local authority going to examination would not be required to release any Green Belt to meet its housing needs, regardless of the degree to which that land meets the purposes of Green Belt, and as such the Local Plan not be found unsound on this basis.

The NPPF states that there needs to be exceptional circumstances in order to amend Green Belt boundaries. However, it does not set out what these should be other than a ministerial statement outlining that housing need is not an exceptional circumstance. Could the Government set out what it considers to be the exceptional circumstances for amending Green Belt boundaries? For example, would the delivery of smaller homes and/or more affordable housing, as identified in the objectively assessed need, be considered an exceptional circumstance?

Infrastructure

A major concern for our residents is the need for improved infrastructure. Our roads and schools are already operating at capacity and whilst we have successfully collected money through the Community Infrastructure Levy and used this to support improvements to our roads, schools and community facilities more funding is required to support major strategic improvements, in particular to our road network and for public transport.

The Housing White paper identified more infrastructure funding will be available to support those areas taking the most growth. What criteria will be used to identify areas taking most growth? Will it be those areas which take the most housing in absolute numbers or will 'growth' be determined by the percentage increase over existing housing in an area? Over what period will growth be measured before infrastructure funding will be made available to any area? What is needed is the right infrastructure to meet any area taking growth where the current infrastructure is at capacity. Will the government support the delivery of strategic infrastructure such as increased train capacity and possibly new highways and give assurances that the delivery of these will keep pace with the provision of new housing in Elmbridge and the surrounding area? If this funding is not allocated to new infrastructure projects supporting growth in Elmbridge or the Government is unable to give assurances on strategic infrastructure, will the Government support us in limiting the numbers of new homes we must provide in our Borough?

Timescales for delivery

Finally, the Government has set out in the Housing White Paper that if plans are more than 5 years old then they are considered to be out of date and that the targets they contain should not be used to calculate an authority's 5-year housing land supply. As such Councils in this

position must use the most up to date figures on housing need to calculate their 5-year housing land supply.

At the end of 2014 the Council began the process of reviewing its Core Strategy recognising that its Plan had been adopted prior to the publication of the NPPF. As part of this process the Council prepared a new Strategic Housing Market Assessment to understand what its housing needs were and whether this level of need could be delivered through our existing plan. The findings of this review indicated that we could not and that a new Local Plan must be prepared.

However, the Housing White Paper now sets out that the Government is planning on introducing a standardised national methodology to assess housing need. This will delay the preparation of our Plan and, as such, take us beyond our deadline for submission for examination by February 2018, a deadline which reflects Government recommendations on plan delivery. Would the Government, therefore, allow us to continue to use our Core Strategy target of 250 units per annum as the basis for our 5-year land supply until we are able to prepare a Local Plan for examination based on the Objectively Assessed Need identified by the proposed new standardised national methodology?

Whilst we will be formally responding to the consultation on the Housing White Paper we look forward to your response to our questions as soon as possible in order for us to determine whether we should continue with the work on our current Local Plan proposals. In the meantime, if you or your officers have any further question please contact Mark Behrendt at mbehrendt@elmbridge.gov.uk

Yours sincerely



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(Residents' Association)



Andrew Davis
Deputy Leader of the Council
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