

# Godstone Parish Council

(incorporating the Villages of Godstone, South Godstone and Blindley Heath)

## Clerk to the Parish Council

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24 September 2024

Dear Sirs

### **Response to the Consultation on the National Planning Policy Framework (NPPF)**

With respect to the open consultation on the NPPF, rather than provide responses to all 106 survey questions, Godstone Parish Council would like to register our concerns by way of this letter, which allows focus on the key issues that concern Godstone Parish as impacted by the proposed changes. This letter has been prepared following research based on information available in the public domain in time for the deadline of 24 September 2024. The council therefore reserves the right to amend or update its response pending further developments in the consultation process or any fresh information received or provided.

2. Retaining Urban Uplift. We would like to affirm our support of the urban uplift, and therefore disagree with the proposal to reverse the Dec 2023 changes put in place to support it. We believe that development should be focused at the largest, most sustainable settlements and increasing population density within them, in order to make best use of existing infrastructure and give greater priority to the reuse of brownfield land. Moreover, significant uplifts in the average density of residential development may be inappropriate if the resulting built form would be wholly out of character with the existing area. Paragraphs 62 and 130 should therefore be retained.

3. Importance of the Local Plan. We affirm our support for the development of local plans. We do not agree that all local planning authorities should be required to continually demonstrate 5 years of specific, deliverable sites for decision making purposes, regardless of plan status. The previous change that no longer required this within five years of a plan being adopted was a welcome shift back towards a plan-led system, and an incentive for councils to keep plans up to date. The five-year housing land supply requirement undermines the role of a local plan, making planning unpredictable for all involved, and resulting in less sustainable patterns of growth. Demonstration of the five-year land supply takes significant time and effort for both local planning authorities and developers, including at appeal inquiries. Maintaining a continual supply is also difficult during the early years after a plan's adoption, as larger allocations may take longer than five years to deliver housing, so the requirement to maintain the five-year supply during those early years seems contradictory to the aims of a plan-led system.

4. Previously-developed Land (PDL), 'Grey Belt' & the Green Belt. We wish to affirm the use and definition of the Green Belt as an urban containment tool rather than a designation relating to environmental quality: development of isolated 'grey belt' land would not meet its objective, and neither would targeting previously-developed or poor-quality land if it is not appropriately located or connected to other elements of transport and infrastructure. The proposed changes have introduced ambiguity by stating that any exceptions to Green Belt development can occur if there is no 'substantial harm caused to the openness of the Green Belt'. At the same time, there should be more specific guidance and protections of agricultural land, as well as specific references to land with other special ecological protections due to biodiversity or other environmental reasons, e.g. SSSIs. In this respect we therefore agree that Local Nature Recovery Strategies could play a large role in identifying areas of Green Belt which can be enhanced, with strengthened explicit protections under the framework.

5. 50% Target for Green Belt areas. We are of the view that realistic targets should be set in low land value areas. Therefore we disagree with applying a blanket 50% target for Green Belt Areas. There should be some flexibility, particularly bearing in mind that the suggested greater focus on social rented housing will have an impact on viability as this is significantly more costly to provide. Green belt and grey belt sites may still have constraints such as land contamination or the need to mitigate against natural habitat impacts.

6. Compulsory Purchase Powers. We object strongly to the proposed approach set out regarding the use of compulsory purchase powers, i.e. where no land is not brought forward for development on a voluntary basis, the Government is considering how bodies such as local planning authorities, combined authorities, and Homes England could take a proactive role in the assembly of the land to help bring forward policy compliant schemes, supported where necessary by compulsory purchase powers, with compensation being assessed under the statutory no-scheme principle rules set out in Part 2 of the Land Compensation Act 1961. As Parish landowners and stewards of common land, we do not support the use of compulsory purchase powers in the first instance, and object to any strengthening of these powers. It should be made absolutely clear that these powers are used as a last resort, and with explicit safeguards stated in guidelines.

The views set out above are the result of Godstone Parish Council's consideration of the extensive documents contained within the consultation and publicly-available research, which might have included advice and/ or responses from other organisations representing interests within a similarly rural setting. Within the confines of the short consultation window, it was not possible for us to consider all of the questions and issues raised in the consultation. Should the consultation window be extended to a later date, we would appreciate much more time to consider the impact of the changes proposed to the NPPF, which we believe will have profound adverse effects upon planning issues and land within Godstone Parish.

Yours sincerely



Sarah Endersby  
Clerk to Godstone Parish Council