



## ELSTEAD PARISH COUNCIL

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17<sup>th</sup> December 2015

Mr Jeremy Hunt MP,  
2 Royal Parade  
Tilford Road  
Hindhead  
Surrey GU26 6TD

Dear Mr Hunt,

### HOUSING AND PLANNING BILL

I am writing on behalf of Elstead Parish Council to raise the Council's concerns about the implications of parts of the Housing and Planning Bill, currently before Parliament.

Clauses 102 and 103 of the Bill appear to open up the possibility of the Government intervening directly to award planning consent for residential development on brownfield land. Clause 103 would require local planning authorities to maintain registers of brownfield land suitable for housing (according to criteria drawn up by the Secretary of State), while Clause 102 would allow the Secretary of State directly to grant consent for housing development on land included in the registers.

Our concerns about this proposed legislation relate to the use to which it might be put by owners of brownfield land designated for employment use, or mixed employment/residential use. Elstead is a village of nearly 3,000 residents which over the past 15 years or so has seen the loss of 5 significant employment sites to residential development. As a result, there is little employment left in the village itself. There is one business site just outside the village which offers a range of accommodation for small and medium sized enterprises. It appears to be a successful venture and over 300 people are employed on the site by several different companies. Adjacent to it is a further 8 acre brownfield site which until 2008 accommodated an engineering factory making camshafts. The parent company then went bankrupt and the site was bought by a property development company. Since 2008, the site has remained vacant and has fallen into a state of severe and dangerous dereliction.

The most appropriate use of this site would be for employment. There is a strong demand locally for business premises, particularly for those capable of accommodating the small and medium sized enterprises typically found in the more rural environment. The site also has good transport links (the A3 is less than 2 miles away). The local planning authority, Waverley Borough Council, has identified a significant current and forecast shortfall of employment land in the borough. As the site is not close to any major settlement or to the services required by a large housing development, it would not be suitable for large scale residential use. It also lies within 400m of a Special Protection Area.

The owners of the vacant site have none the less argued that it would not be commercially viable to use the site for business use, as opposed to housing. In conjunction with Linden Homes, they have promoted a scheme for building 69 homes on the site, along with a residential care home. These proposals have been rejected by the planning authority, mainly for the reasons set out in the above paragraph. We suspect that the main driving force for the use of the site for housing rather than employment is the fact that land for housing is worth nearly double that of land for employment.

Our concern is that the proposals in the Housing and Planning Bill will further encourage the speculative owners of former industrial brownfield land to hold on to land the hope and expectation that in time either the planning authority or the government will authorise a change of use to housing, thereby virtually doubling its value. This would be in neither the national nor the local interest.

The objective of government policy should be that of securing the appropriate and optimum use of brownfield land at the earliest opportunity. Our experience in Elstead is that current policies, reinforced by the strong demand for housing land in the South-East, are acting as a disincentive to the release of brownfield land for employment use. Developers stand to gain more from letting vacant land lie idle, often for extended periods of years, than they would earn from putting it to productive use. Our worry is that the provisions of the Housing and Land Bill, as they stand and if enacted, would make this situation worse.

Elstead and the neighbouring parish of Peper Harow are in the process of jointly preparing a Neighbourhood Plan covering the village of Elstead and the vacant site referred to above, the larger part of which lies in Peper Harow parish. The Plan will include guidance on how the site should best be used in the interests of the local community, having regard to the government's policies as set out in the National Planning Policy Framework. We suggest therefore that the Housing and Planning Bill should include specific provisions in relation to the use of brownfield land which would require any planning consent – issued either by the planning authority or the government – to have full regard to the provisions of any applicable Neighbourhood Plan. This would I am sure give local communities some assurance that their views will be given adequate weight, and will also provide an additional incentive for parishes to undertake the often laborious and time consuming (though ultimately rewarding) process of drawing up Neighbourhood Plans.

It would be helpful if you could pass on these concerns to the Secretary of State for Communities and Local Government. I look forward to receiving his response in due course.

P. W. Murphy

Chairman, Elstead Parish Council

