



Sent by email to Rt Hon Angela Rayner MP

Rt Hon Angela Rayner MP  
Deputy Prime Minister and Secretary of State for  
Housing, Communities & Local Government  
2 Marsham Street  
London  
SW1P 4DF

24 September 2024

Dear Angela,

**GUILDFORD BOROUGH COUNCIL LETTER RE: PLAYING YOUR PART IN BUILDING THE HOMES WE NEED**

Thank you for your letter dated 30 July 2024 alongside the Ministry's detailed proposals regarding reforms to the National Planning Policy Framework (NPPF) and other changes to the planning system. On behalf of the administration at Guildford Borough Council, I would like to set out our views on several elements of the plan outlined in your letter.

At the outset, we must stress that we are not opposed to development and are committed to a plan-led system but do believe that it has to be the right development in the right places to meet local needs. It is in this context that we raise the following detail points.

*Housing targets*

We have taken note of the potential housing need figure for Guildford resulting from proposed changes to the standard method. Whilst we understand the urgency of meeting housing needs across the country, the proposed figure for Guildford is high and likely to be very challenging for us to meet.

Our context is such that we have an adopted Local Plan that met our housing need in full, including a housing requirement of 562 dwellings per annum (dpa). The Plan included substantial Green Belt release in 2019 in order to meet our development needs. It has only recently become 5 years old, and our Council has resolved to update it.

We are concerned that the proposed new local housing need figure of 1,102dpa, whilst clearly placing a significant challenge for us in terms of plan-making, will result in a form of 'cliff-edge' that will put the borough at risk of potentially inappropriate speculative development during the period that we are seeking to update our Plan. We would thus ask that Government consider a suitable

transition period between the validity of our current Local Plan housing requirement and the coming into effect of the proposed standard method figure. This is especially important to Councils such as Guildford where we have a track record of plan-making which meets needs in full but are now likely to be faced with a period where a substantially increased local housing need figure will be in place for several years whilst we produce an updated Local Plan. The need for this is greater still in the context of our Council which is faced with such a significant and unexpected uplift in our housing need with very short-term implications. Should this transition period not be agreed, we would ask that your department carefully consider the Council's technical responses to the Government consultation, which propose measures to avoid or reduce the risks associated with an extended period where the borough is vulnerable to speculative development.

We would also emphasise that our borough is heavily constrained. It contains areas which are protected for a variety of reasons over and above Green Belt designation such as the Surrey Hills National Landscape (which is being proposed to be further enlarged), the Thames Basin Heaths Special Protection Area, and various other areas of conservation importance, alongside areas which are prone to flooding. This places limits on the land available for new development. Whilst we are pleased to see that protections for these 'hard' constraints will remain, we consider that the presence of such constraints should be considered as part of the process of setting the proposed housing need figure.

#### *Green Belt and Grey Belt*

We note Government's intent to allow for Green Belt (and as part of this, 'Grey Belt') sites to be considered for development where there is a need, and that such development can come forward outside of a Local Plan process. In this regard, we are concerned that the scope for such speculative development to come forward through planning applications is too wide and left undefined by the proposals. This is largely due to a lack of clarity regarding what can be considered Grey Belt. We would ask that Government provide greater clarity regarding the nature and definition of Grey Belt sites. We are particularly concerned regarding the impacts of this approach and the potential for larger scale developments to come forward outside of a Local Plan process. We can see little justification for this to occur, especially in the case of schemes which cannot be delivered in the short term to address any immediate supply issues. If a site is considered 'not inappropriate' in Green Belt terms because a 5-Year Housing Land Supply does not exist, then surely to be acceptable that site should have to contribute to correcting this deficiency i.e. it should be delivered within the next 5 years. Not to include and enforce such a requirement would seemingly make little sense. We ask that Government reconsider its approach to the criteria according to which Grey Belt sites may be considered 'not inappropriate' for development, alongside the definition of Grey Belt itself.

#### *Social and affordable housing*

Regarding social and affordable housing, we are pleased with the focus of proposals to provide Local Planning Authorities with greater powers to ensure that the housing required under the proposed NPPF meets local needs – we agree that these powers should be strengthened further. This includes Local Authorities being able to specify the types of housing it seeks i.e. for social rent and first-time buyers. The ability to afford suitable homes to live in is a major issue in Guildford

borough. The lack of affordable housing makes it difficult to recruit and retain staff and we consider greater opportunities to provide housing for key workers would help address the issue. We consider further attention should be paid to this issue and we seek continued and increased Government support to contribute to providing more decent and affordable homes in our borough.

### *Growth supporting infrastructure*

We are pleased that you raise the matter of infrastructure to support growth, however we believe proposals should go further. The provision of supporting infrastructure is a major issue when it comes to development. While the Council can impose conditions on a planning application and require developers to make section 106 contributions, a lot of the delivery of the infrastructure is outside of the borough's control. We rely on other organisations such as Surrey County Council for highways and education provision, the NHS for health care particularly primary care, and a host of other stakeholders for the delivery of other infrastructure (e.g. power networks, water, sewage, rail) necessary to support development. We feel that there should be a stronger duty on those other responsible organisations to co-operate with the borough council in the delivery of infrastructure appropriate to each development.

Regarding our infrastructure needs, we would also like to raise the need for Government support for flood alleviation in Guildford. Our ability to build on brownfield sites within Guildford Town Centre is limited because of the flooding issue. We are giving priority to a flood alleviation scheme (FAS), which is being discussed with the Environmental Agency and Surrey County Council. Our intent is that this will protect existing properties and may make more brownfield sites available for development. This would help Guildford's economy including the prospect of more mixed development in the Town Centre. We would welcome further Government support for Guildford's FAS and as part of this would request consideration of any intervention that may enable acceleration of scheme's planning and delivery timetable.

Finally, to support growth, we consider that appropriate densification through making efficient use of land could help address the need for additional housing, but this is dependent on supporting infrastructure (alongside good design) and we would ask Government to assist in addressing issues as outlined in this regard. Further, on the matter of design, we do note that the consultation refers to an increased emphasis of local scale design coding and guidance. Design is a particular area of resource challenge to the Council, both in terms of securing qualified staff alongside funding the proactive work to provide for instruments such as coding. We would ask that Government consider further support to help address these resource challenges.

### *Next phase of reform*

In conclusion and in anticipation of the next phase of reform, we wish to highlight that whilst Government has rightly focussed on transition arrangements for any plan-making that is at an advanced stage, we wish to highlight that the transition is also challenging for Councils such as Guildford who are at an early stage of a new cycle of plan-making. Whilst we are advised to prepare and progress our updated Local Plan under the proposed revised version of the NPPF, there remain areas of significant uncertainty for Guildford. These include, to name but a few:

- resolution on matters related to the current NPPF consultation, which include fundamental starting points for plan-making, including the approach to Green Belt and housing need (although we welcome what we understand are commitments to progress this toward a final published version by the end of the year).
- publication of regulations for Councils to progress new style plan-making under the Levelling-up and Regeneration Act which will be necessary for Guildford's plan-making process, as Government have set a deadline to submit Plans under the existing 2004 Act by no later than December 2026.
- consultation on and publication of National Development Management Policies in order for the Council to understand their implications for the scope and remit of Local Plans

In this light, we would be supportive of efforts to expedite progress with national planning reform to provide greater clarity and a more stable national context as we continue to progress with plan-making for our borough. Should Government undertake a pilot scheme on Local Plan updates under the reformed planning system, we would welcome an opportunity to consider being part of this as we are keen to ensure that our Local Plan update progresses in a timely manner and in line with new and forthcoming requirements. Finally, we would also hope that our suggestions to provide some protection to authorities in the intervening period are carefully considered to ensure that a plan-led system that results in the right development in the right places to meet local needs prevails.

Yours sincerely,



**Councillor Julia McShane**  
**Leader of the Council**



**Councillor Fiona White**  
**Portfolio Holder: Planning**

Cc:  
Zöe Franklin MP  
Rt Hon Jeremy Hunt MP  
Al Pinkerton MP