

Appendix 1

Dear Secretary of State for Housing, Communities and Local Government,

Guildford Borough Council recently¹, along with many others including Surrey County Council, declared a Climate Emergency. As part of this resolution, the Council also committed to calling on the UK government to provide the powers, resources and funding support to make local, as well as national, action against climate change possible. Subsequent to this, a further resolution of the Council has agreed² that the Executive write to the Secretary of State to seek the following actions:

The Council recognises that the National Planning Policy Framework (NPPF) has recently undergone a review. However, with the now declared Climate Emergency (subsequent to that review), and the widespread support of the principle of building on brownfield before greenfield sites wherever possible, the Council asks the Executive to request the Secretary of State to hold an immediate further review of the NPPF and its guidance to:

- (1) Recognise the declared Climate Emergency and provide more detailed guidance on how to deliver truly “sustainable development”³.*

The Council considers that the NPPF does not provide enough guidance on how planning can play its part in helping to tackle the causes and effects of climate change. Given the Climate Emergency that Guildford Borough Council, alongside many others, has declared, national policy and guidance should be revised to strengthen the ability of Councils to require a more radical move to sustainable forms of transport and significantly more energy efficient developments than are currently being delivered. This will accelerate our ability to reach net zero carbon emissions.

- (2) Better assist with brownfield delivery by granting councils simple effective powers to bring forward currently, as well as previously, used sites.*

Guildford has a significant housing need particularly for affordable housing. Given the requirement to identify and maintain a five-year land supply, it was necessary to revise Green Belt boundaries and allocate a number of greenfield sites in the recently adopted Local Plan. At the same time, parts of Guildford town centre are in need of regeneration and could provide a significant contribution to meeting the need for housing if land was used more efficiently. The Council recognises that there are existing mechanisms for bringing forward such land however this is often a complex and lengthy process. The Council

¹ Full Council meeting on 23 July 2019

² Full Council meeting on 3 December 2019

³ NPPF – Paragraph 7 states: ‘the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs’

asks that the process is simplified and that local authorities be given greater powers to bring forward coordinated development where it can facilitate wider regeneration initiatives and deliver much-needed housing in sustainable locations.

- (3) *Amend Paragraph 145 of the NPPF – to correct the unintended consequences in Greenbelt areas of enabling unrestricted building of inappropriate houses through ‘infilling’, yet at the same time preventing residents from having a simple extension or garage for their own home.*

The aim of Green Belt policy is to maintain openness and restrict inappropriate development. This aim is clearly reflected in all but one of the exceptions in paragraph 145 and 146 of the NPPF. Specifically, paragraph 145(e) allows limited infilling in villages. The interpretation of this exception is broad – both in terms of the extent of a village area within which limited infilling can occur and the number of dwellings that constitutes ‘limited’. This has resulted in a substantial increase in development of otherwise open land which is undermining the fundamental aim of the Green Belt. It also results in a perceived injustice amongst the rights of landowners within Green Belt villages, with some able to build numerous new dwellings yet others severely restricted with the extent to which they can extend their existing home.