

Consultation on National Planning Policy Framework (NPPF)

Suffolk Association of Local Councils (SALC) has collated both:

- A non-technical summary of the key NPPF changes – **Appendix A**
- Suggested responses to the NALC survey on proposed changes – **Appendix B**

Action:

Identify and agree any changes the parish council wishes to make to the suggested responses to the NALC.



NON TECHNICAL BRIEFING NOTE

SOME OF THE MAIN PROPOSED CHANGES TO NATIONAL PLANNING POLICY (NPPF SEPTEMBER 2024)

Please note that these changes are in most cases highly technical and this briefing provides a plain English summary. For more precise information please refer to <https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system>

- The Government has stated it wishes to increase housing delivery to 1.5 million new homes nationally over 5 years. To do this Government will set new homes targets that local planning authorities will have to meet and previous flexibility for authorities will be removed (for instance where an authority with a very recent local plan did not have to report new housing delivery)
- New housing targets will be based on a different way to calculate them. In future numbers will be based on the numbers of houses in an area and the affordability of the houses in relation to local wages. The result of this new approach is expected to result in over 20% more homes nationally than the previous approach (but actual numbers will vary between areas).
- It is proposed to allow development in a new class of area. Local planning authorities will need to explore designating 'grey belt' land within existing 'green belt' if they do not have enough housing land (green belt is not all countryside but only those specially identified around the biggest cities and some towns).
- Local planning authorities that need more housing land will have to look again at the 'green belt' boundaries in their areas to decide if all this land still needs to be protected from development. If development is needed it will need to follow new 'golden rules' where the increase in the value of land can be controlled to ensure at least half of any houses are affordable.

- More will be done to provide greater choice in the type of housing , for instance affordable housing will need to include housing to rent at subsidised levels for those on low incomes.
- A number of changes seek to allow more jobs and for businesses to be created or to grow. The changes highlight the modernisation of industries such as transport and more sites for high technology (such as gigafactories, and laboratories) as well as renewable energy.
- It is proposed to bring in strategic planning to improve co-ordination of planning across local authority areas and in sectors such as transport, waste, health, water and energy. Strategic planning would also be used as a tool to make sure that if sufficient housing or economic development cannot be provided in one area then it can be delivered in a neighbouring area.
- One other interesting point is that the Government has kept a planning policy that gives increased importance to recent Neighbourhood Plans even when there is a problem with delivering sufficient housing in an area.

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BRIEFING NOTE FOR SUFFOLK ASSOCIATION OF LOCAL COUNCILS

NALC SURVEY ON MHCLG PROPOSED REFORMS TO NPPF AND OTHER PLANNING REFORMS

The following notes suggest responses to the survey on behalf of Suffolk ALC. In some cases alternative replies are given.

Chapter 3 – Planning for the homes we need

Q4-5 Reverse changes to Para 61.

Agree – The need for more housing justifies clear housing requirements in line and local planning authorities should take all possible steps to meet these requirements

Disagree – Housing market areas differ, for instance in demographic trends or market conditions and the changes properly reflect this and housing targets should only be a starting point in identifying need.

Q6-7 Housing Need Approaches

As for Q4-5 above

Q8-9 Delete urban uplift

Agree – An uplift is not the most effective method for increasing delivery of new homes

Q10-11 Reverse changes on character and density

Agree – Paragraph 130 is an unnecessary provision and Local Planning Authorities already have discretion in relation to character and density.

Q12-13 Spatial Visions

Agree – Spatial Visions can provide clear development guidance.

Q14-15 Amendment to presumptions in favour of sustainable development

Agree – Provides greater clarity

Q16-17 Continually demonstrate Five Year Land Supply

Agree – The need for more housing justifies this because circumstances can change even soon after adoption of a local plan

Q18-19 Changes to Paragraph 77 on housing land supply and ‘buffers’

Suggest this is left blank given this goes to a level of technical detail given I am not sure what your members views might be.

Q20 5% buffer requirement

As for Q18-19.

Chapter 4 – A new Standard Method for assessing housing needs

Q21-22 Housing Stock rather than Household Projections

Agree – This is a clear and consistent criteria that can be easily assessed

Disagree – Household projections have been the basis of housing need assessments for many years.

Q23-24 Workplace based house prices to earnings ratio

Agree – This is a fair and appropriate means to show the affordability of housing

Q25 Appropriate weighting for affordability

Agree

Chapter 5 – Brownfield grey belt and the green belt

Q26-27 Proposed changes to existing Paragraph 124c

Agree – further supports development of brownfield land.

Q28-29 Previously Developed Land in the Green Belt

Agree – clarifies what is appropriate development



Q30-31 *Expanding the Definition of Previously Developed Land*
Agree – policy should encourage the development of this type of land.

Q31 Definition of Grey Belt Land
Agree – definition is clear and readily understood.

Chapter 6 – Delivering affordable, well designed homes and places

Q32-33 *Consider the needs of those requiring social rent*
Agree – there are those who cannot afford other tenures

Q34-35 *Remove 10% requirement of affordable home ownership*
Agree – if this allows resources to more properly support those in housing need
Disagree – This will not help young people who want to ‘get their feet on the housing ladder’

Q36-37 *Remove 25% First Home Requirement*
As for Q34-35

Q38 *Other Comments*
Local Planning Authorities should retain discretion to determine how best to address affordable housing needs within their area.

Q39-Q40 *Mix of Tenures and Types*
Agree – New development should provide choice for those with differing housing needs

Q41 *Promoting High Percentage Affordable Housing*
Seek exemplar partnerships and collaboration between landowners, developers and registered social landlords supported by government financial incentives



- Q42** *Safeguards about unintended consequences*
Clear and extensive requirements for community and local council involvement in planning new development with a commitment to 'co-design'
- Q43** *Measure to support rural affordable housing*
As Q41 and Q42
- Q44 -45** Changes to Paragraph 63
Agree – social rent and 'looked after children' are relevant to housing need.
- Q46-47** Measures to support Community Led Development
Agree – welcome opportunities for communities to address housing needs
- Q48** *Affordable housing for rent definition*
Suggest this is left blank given this goes to a level of technical detail given I am not sure what your members views might be.
- Q49** *Small Site Allocations*
This may be partly explained by the Local Planning Authorities resource challenges and a slow unwieldy local plan process. Neighbourhood Plans may be a tool to assist.
- Q50-51** *Removal of references to Beauty*
Agree – Beauty is too subjective a term.
- Q52-53** *Upwards Extensions*
Agree – There is no need to amplify text on mansard roofs
- Q54** *Other Suggestions?*
Leave blank

Chapter 7 – Building Infrastructure to grow the economy

Q55-56 *Changes to 86b and 87*

Agree – Important to update the policy in line with new economic priorities.

Q57 *What other sectors should be supported?*

Other areas depend on your members concerns – is more flexibility needed to allow family run rural businesses to expand in existing locations?

Q58-60 *Extending NSIP regime*

Agree – in principle provided that there is a threshold that ensure smaller scale proposals are dealt with by the Local Planning Authorities

Chapter 8 – Delivering community needs

Q61-62 *Paragraph 100*

Agree – provided that the impact on local communities is properly considered

Q63-64 *Early years and post 16 facilities*

Agree – addressing the needs of all learners is important

Q65-66 *Vision Led Approach and Testing Highway Scenarios*

Agree – important to consider what is being sought to be Achieved.

Q67-68 *Healthy Communities*

Recognise that local communities can contribute to better outcomes through recreation, transport and other initiatives.

Chapter 9 – Supporting green energy and the environment

Q69-70 Onshore wind and NSIPs

Agree – provided that the environmental impacts of onshore wind projects are properly considered with full local community involvement

Q71-72 Renewable and low carbon energy

Agree – provided that the environmental impacts of onshore wind projects are properly considered with full local community involvement

Q73-74 Protecting sensitive habitats

Agree – peat soils for instance need proper protection

Q75-76 Onshore wind turbine threshold

Suggest this is left blank given this goes to a level of technical detail given I am not sure what your members views might be.

Q77-81 Solar Panel threshold and renewables

Suggest this is left blank given this goes to a level of technical detail given I am not sure what your members views might be.

Q82-84 Flood Risk Management

Agree – the revised NPPF includes no changes to the section on flood risk and this should be reviewed to ensure that there is no weakening of these provisions in the light of other changes proposed.

Q85-87 Food Production

Disagree – the footnote should not be removed as food production should continue to be a factor in deciding the best use of land.

Q88-90 Water Infrastructure

Agree – there is a pressing and urgent need to address water supply, drainage and treatment.

Chapter 10 – Local Plan Intervention

Q91-94 Intervention Criteria

Suggest this is left blank given this goes to a level of technical detail given I am not sure what your members views might be.

Q95-96 Householder Application Fees

Suggest this is left blank given this goes to a level of technical detail given I am not sure what your members views might be.

Q97-103 Transitional Arrangements and Other Matters

Suggest this is left blank given this goes to a level of technical detail given I am not sure what your members views might be.

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