

Briefing note on NPPF Consultation to Parish and Town Councils

Government consultation on the proposed reforms to the National Planning Policy Framework (NPPF) and other changes to the planning system consultation.

Consultation closes on 24 September 2024.

[Proposed reforms to the National Planning Policy Framework and other changes to the planning system - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system)

Background and Headlines

The Government published a revised NPPF on 30 July for consultation in line with the King's Speech. The proposed changes to the NPPF are to implement the Government's target to deliver 1.5 million new dwellings over this Parliament, in England, and move the annual housing completions target beyond the Conservative Government's target of 300,000 pa to 370,000.

Essentially the changes to the December 2023 NPPF have been deleted and there are new approaches to:

- Calculating the housing targets for local planning authorities
- The 5-year housing land supply position
- A more flexible approach to development in the Green Belt
- Affordable housing provision
- Emphasis on delivery of essential infrastructure, especially public service facilities.
- Stronger support for economic development and all types of renewable/low carbon energy infrastructure.
- Support for more sustainable transport provision and infrastructure. This is to be 'vision' led rather than reactive and has implication for the county council.

Local Plan making

- Under the revised transitional arrangements, the SWDPR examination can continue, and the Inspectors will still be testing the Plan against the 2021 NPPF.
- However, since the annual housing figure will be over 200 dwellings pa higher, under the new mandatory Standard Method, the SWC must undertake an immediate review of any newly adopted SWDP. This will need to set how the new mandatory housing target will be delivered and include a review of the Green Belt to identify sites for development, if housing requirements cannot be met outside of designated Green Belt.
- The requirements for LPAs to demonstrate a five-year housing land supply (5YHLS), even when the adopted plan is less than five years old is reinstated.
- As a forerunner to the reintroduction of a level of strategic planning the Duty to Cooperate remains, but with a stronger duty on local authorities to meet cross boundary needs for housing, employment and infrastructure development.

Housing

- The ability to show a four rather than five-year housing land supply in certain cases has been removed. In the SWC case the four-year supply, as the SWDPR is under examination is dropped and will revert to a five-year supply.
- The requirement for local planning authorities to include a buffer of five per cent on top of their five-year housing land supply is proposed to be reintroduced.
- It is proposed to remove the wording on past oversupply in paragraph 77, which was introduced to set out that previous over-supply could be set against upcoming supply.
- The Standard Method for calculating housing need has been revised. The calculations are now based on housing stock and no longer household formation trends. Therefore, the starting point for the calculation will change from using housing projections to housing stock numbers.
- The way an uplift based on house price affordability has changed. The consequences of all these changes gives a larger housing figure (see table below for outcomes).

	Current 2023 annual housing need	Proposed 2023 annual housing need	Difference	Percentage increase
Malvern Hills	368	609	241	65%
Wychavon	486	959	473	97%
Worcester	339	584	245	72%
SWCs Total	1,193	2,152	959	80%

- The proposals say that Plans at examination would continue to be examined under the version of the NPPF they were submitted under. However, if the revised local housing need figure is more than 200 homes per annum higher than the figure in the adopted version of the plan, upon introduction of the new plan-making system, the LPA would be required to begin preparation of a plan under the new system as soon as possible. The difference in the 2023 annual local housing need is 959 between the current standard method and proposed standard method.
- Once the SWDPR is adopted, the difference in the local housing figure between the SWDPR and the revised figure would be 859 dwellings. The SWDPR is proposing an annual local housing requirement of 1,293 as it is based on the standard method at the time of SWDPR Regulation 19 consultation version. The revised local housing need figure would remain more than 200 homes per annum higher than the revised local housing need

therefore preparation of a new plan would need to begin as soon as the SWDPR is adopted.

Green Belt:

- A return to pre-2023 wording in that ‘Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.’ But with addition of what the exceptional circumstances may include.
- Green Belt will be required to be reviewed and sites identified where the housing need cannot be met on land outside the Green Belt.
- Land in Green Belts can still be subject to planning applications, if it meets the new criteria, even where an adopted local plan is in place.
- New reference to hierarchy of land for release of land in Green Belt, so-called ‘Golden rules’ and introduction of ‘Grey belt’ land and the contributions that they should provide, including 50% affordable housing, necessary improvements to local or national infrastructure and new or improved green spaces. A definition of Grey belt is provided in the Glossary.
- Change to consideration of limited infilling or the partial or complete redevelopment of previously developed land, so that it is not classed as inappropriate development in the Green Belt if it ‘would not cause substantial harm to the openness of the Green Belt.’
- In addition, housing, commercial and other development in the Green Belt should not be regarded as inappropriate where on Grey belt land in sustainable locations, if: contributions set out in (new) para 155 are provided, development would not fundamentally undermine the function of the Green Belt across the area of the plan as a whole and where 5yhls cannot be demonstrated or Housing Delivery Test indicates that the delivery of housing was below 75% of the housing requirement over the previous three years.
- Requirement for development proposals to meet local green space standards or, if none, national standards.
- New definition in Annex 2: Glossary: Grey belts.
- New Annex 4: Viability in relation to Green Belt release – use of benchmark land values and expectation that development proposals would deliver policy-compliant development.

Affordable Housing:

- Greater emphasis on social rent and planning policies to specify ‘the minimum proportion of Social Rent homes required’.
- Dropped requirement for 10% of affordable housing to be for affordable home ownership.
- LPAs should support ‘mixed tenure sites’.
- Amendments to definition of affordable housing in Annex 2: Glossary: starter homes deleted and replaced with First Homes and to local housing needs.

Economic Development

- The NPPF sets out that the planning system is a key delivery mechanism for achieving the economic growth the Government is seeking to achieve. Support strengthened for employment generating development with 5 typologies of development identified i) laboratories; ii) gigafactories iii) data centres; iv) digital infrastructure; v) freight and logistics.
- Local authorities need to work on a strategic level to support delivery of employment generating development and these five types in particular.

Development Management

- Changes to the tilted balance / para 11d and identification of outdated policies. Housing supply related policies are considered to be out of date if they are 5 years old or more and/or the Local Authority cannot demonstrate a 5 year housing land supply.
- Changes relating to the DM process, e.g. the 5-year housing supply will come into force on the publication of the revised NPPF. The Government has indicated this will be before the end of 2024.
- Proposed increase in householder planning application fees from £258 to £528.
- Proposals to introduce localised planning fees on other types of development or allow LPA to vary default nationally set fees with prescribed limits. The aim is to provide transparency and accountability.

Wider changes to the planning system

- National development management policies in the pipeline.
- A revised role for Planning Committee to only consider substantial planning applications and wider use of delegated decisions for more planning applications.
- More detail on a slimmed down local plan preparation process.

What next?

A briefing has been given to all district councillors from officers in the Policy Plans Team and the draft response from Malvern Hills District Council and Wychavon District Council will be considered for approval by the council's Executive Committee and Executive Board on the 17 and 18 September respectively. The agenda and contents for these meetings will be published earlier in September so the draft officer response to the NPPF consultation questions may help with preparing a response from parish and town councils by the 24 September 2024.

Should you wish to discuss any aspect of the proposed changes to the NPPF please contact the Policy Plans Team on 01386-565565 or email policy.plans@wychavon.gov.uk