

# Proposed Changes to The National Planning Policy Framework (NPPF) 2024

A Summary and Commentary by MHPS Committee Member Elizabeth Silver (3/12/24)

*Commentary in italics.*

The National Planning Policy Framework (NPPF) is a 78-page reference document that acts as the rulebook for local authorities and developers. The content of the NPPF is central to any representation that MHPS may make regarding planning applications.

Proposed changes to the 2023 NPPF were put out for public consultation for an 8-week period which ended on 24<sup>th</sup> September 2024.

## **A. Who stands to benefit from the changes?**

### ***The big developers***

*The proposed changes in the NPPF look as if they could have been written after lobbying by the large housebuilders and developers. There are now only six large developers [2],[3], and they have the ability to put pressure on the government regarding housing targets and rules on Green Belt. They are already doing so in 'variation agreements' in order to reduce the numbers of affordable homes or withdraw supporting infrastructure, claiming that the schemes are 'unviable' if they cannot guarantee a 20% profit [2].*

***Not social tenants or the homeless, not U.K. farms, or nature.***

## **B. Top-Down Housing Targets**

- The government could mandate 5-year (rolling) housing targets and the associated supply of land, according to a 'Local Housing Need'.
- The 'Local Housing Need' (LHN) is calculated as follows:

$$\text{LHN}_{\text{at time } t} = \text{Dwelling stock}_{\text{(at time } t-1)} \times 0.8\% \times (1 + \text{Adjustment Factor})$$
$$\text{Adjustment Factor} = ((\text{Three year average affordability ratio}) - 4) / 4 \times 0.6$$

*We assume that t refers to the current 3-year period, and t-1 to the previous 3-year period.*

Affordability ratio = median house price / median earnings

From [1]: "14. First, we propose **increasing the significance of affordability** by revising the affordability adjustment. This would mean that the baseline stock figure is adjusted upwards in areas where house prices are more than four times higher than earnings: for every 1% above that 4:1 ratio, **the multiplier increases to 0.6%** (the current method multiplier is 0.25%). This will increase the importance of housing affordability in assessing needs which will help direct more homes to where they are most needed. Second, it is proposed that **average affordability over the three most recent years for which data is available** will be used. Using an average, rather than just the most recent datapoint, will help smooth out changes in affordability and will provide further stability and certainty in inputs and outputs of the method."

- 'Local Housing Need' will have an extra 5-20% margin added on.

Therefore:

- The targets are market-driven not need-driven.
- They are not a function of projected population, current population, local character or local need.
- Where prices are higher, more housing is to be built.
- Where there is already high density, more housing is to be built. This leads to an exponential increase.

In addition:

- No credit for over-supply in the previous years
- No mention of empty homes (there were 676,000 in England in 2022).
- New homes are to be placed to maximise existing infrastructure such as public transport, schools, medical facilities and shops, i.e. to avoid increasing GP provision etc
- 'Affordable Housing' (AH) is a key phrase that remains. It is 'subject to viability' and there is no specification for the social rent quota. *(Social rent homes have rents set by a formula tied to local incomes. [Understanding types of rent - Notting Hill Genesis](#) [What is social housing? - Shelter England](#) )*
- Proposed changes will remove requirement that at least 10% of homes on major sites are AH, and at least 25% of homes on major sites to be First or Starter Homes.
- Proposed changes allow setting lower quotas of AH for 'lower value' Green Belt (GB). A 'lower value' GB means that developers will sell each non-AH house for less, so they can afford to build fewer AH units. However, they will also have paid less for the land.

### C. Threat to Green Belt

The proposed changes suggest:

- Deleting paragraph 62 (of 2023 NPPF) which stated that extra housing should be built within cities and urban centres; i.e. Green Belt is open to development
- Reversing a statement in the 2023 NPPF stating that "significant uplift in the density may be inappropriate if it is wholly out of character with the existing area"
- Expanding the definition of Previously Developed Land (PDL)
- Introducing a new category of 'grey belt' land which is Green Belt with a "limited contribution to Green Belt purposes".  
Examples of Green Belt that could be classified as 'grey belt': neglected Green Belt, "agricultural land of lower quality" (which incidentally is good for rough grazing and pasture). There is a danger of deliberately neglecting Green Belt land, by fly-tipping, parking lots and outbuildings.
- A new para 144 to be added "improvements... to the accessibility of the remaining Green Belt land"

We at MHPS ask whether this could mean car parks, cycle tracks, sports centres and cafes leading to PDL?

- Releasing Green Belt land to meet commercial and other development needs such as data centres, laboratories, digital infrastructure projects, onshore wind, could come under Nationally Significant Infrastructure Projects (alongside already designated energy, transport, water & waste) and given high priority for development. It means there is no chance for local councils to refuse, even if on Green Belt. The land would then become PDL.

### **Views of the London Green Belt Council (LGBC) and Campaign for the Protection of Rural England (CPRE)**

*The LGBC [2] highlights the fact that data centres are large unattractive buildings that generate a lot of heat and need power and water for cooling. However, building them on urban brownfield would allow the waste heat to be used by local homes and offices.*

*At a Campaign to Protect Rural England (CPRE ) web seminar on 12 September, an example was given of the Colne Valley Regional Park (West of Uxbridge, London) which has lots of benefits for nature. It is already much under threat due to Very Special Circumstances (VSC) being claimed e.g. for HS2 rail, two data centres (one built around Iver), an electricity sub-station and the expansion of Pinewood film and TV studios in Iver. All proposals were considered in isolation, not cumulatively, with little mitigation, except for “trees around the edge”.*

*The LGBC and CPRE support green energy as long as it does not despoil the countryside and local communities’ points of view are taken into account. They are strongly in favour of using roofs first for solar energy, rather than making solar farms on agricultural land.*

#### **D. ‘Golden Rules’ for building on newly released Green Belt**

The golden rules ‘should ensure benefits to communities and nature.’ These are:

- Provision of at least 50% AH, with an appropriate proportion being social rent ‘subject to viability’ for the developer. Local authorities to decide the mix

Necessary improvement to infrastructure such as schools GPs, care homes – recognising that ‘local leaders are ‘best placed to decide infrastructure needed’

*Note: MHPS was told by Barnet Council during the local plan examination that extra medical facilities is not their responsibility, but that of the Care Quality Commission and Integrated Care Boards, using NHS data.*

*Fact Sheet 4: New homes and healthcare facilities - GOV.UK ([www.gov.uk](http://www.gov.uk)) and How Will Integrated Care Systems Work? | The King's Fund ([kingsfund.org.uk](http://kingsfund.org.uk)).*

*Police allocation was said to be the responsibility of the Metropolitan Police.*

- Making local green spaces ‘accessible’ to public, within a short walk of their homes either on site or access to off-site facilities or to bolster Biodiversity Net Gain (BNG). *BNG is a metric which is supposed to measure the extra biodiversity envisaged by a development, however the calculation of this metric is complex and opaque.*

The NPPF consultation asked whether the ‘Golden Rules’ should apply to commercial development and other types of permitted development on Green Belt or only on newly released Green Belt.

#### **E. Compulsory Purchase of Land**

NPPF changes suggest prioritising ‘grey belt’ for development. If not sold voluntarily there will be compulsory purchase. Local Planning authorities, combined authorities, and Homes England will force landowners to sell ‘at a fair price’. If a high proportion of AH is envisaged, the price paid to the landowner will be lower.

#### **F. Building Design - remove references to ‘Beauty’ and ‘Beautiful’**

It is proposed to remove references to ‘Beauty’ and ‘Beautiful’ as introduced in 2023 as these terms are considered to be subjective, and to retain references to ‘well-designed’ and use the National Model Design Code. [National Model Design Code - GOV.UK \(www.gov.uk\)](https://www.gov.uk/national-model-design-code)

#### **G. Supporting Upward Extensions**

The changes suggest approval of all types of upward extensions, including Mansard roofs, but the reference to a compatible height has been removed.

“where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene”.

#### **H. Transport Planning**

‘Vision-led’ transport planning is preferred rather than ‘predict and provide’. This means planning for what you would like to see rather than what may be needed, for example building estates with little provision for cars.

#### **I Water Infrastructure**

The consultation had questions about improving water infrastructure.

*Response by E.S.: Dozens of reservoirs had been sold off by water companies, to housing developers, with no new ones having been built in the last 30 years, despite a population increase. Any available reservoirs should be re-instated and a national water carrier built from the north-west of England to the over-populated and water-deficient south-east.*

**J ‘National Landscapes’** are to be the new name for Areas of Outstanding Natural Beauty.

*Response by E.S.: This might presage a change in emphasis, where a National Landscape could be used for large-scale national infrastructure.*

Referenced documents:

- [1] [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)
- [2] [LONDON-GREEN-BELT-COUNCIL-NPPF-COMMENTS-FINAL-CORRECTED-.pdf \(londongreenbeltcouncil.org.uk\)](https://londongreenbeltcouncil.org.uk/wp-content/uploads/2024/09/LONDON-GREEN-BELT-COUNCIL-NPPF-COMMENTS-FINAL-CORRECTED-.pdf)
- [3] [National Planning Policy Framework consultation response \(September 2024\) - CPRE](https://www.cpre.org.uk/news/national-planning-policy-framework-consultation-response-september-2024)
- [4] [Fact Sheet 4: New homes and healthcare facilities - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/fact-sheet-4-new-homes-and-healthcare-facilities)
- [5] [How Will Integrated Care Systems Work? | The King's Fund \(kingsfund.org.uk\)](https://www.kingsfund.org.uk/publications/how-will-integrated-care-systems-work)