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Response to Draft NPPF 2024

Comments in Relation to Chapter 1 – Introduction

The NPPF is not only hard to understand but also written in a confusing way that makes it difficult for people to take part in the consultation process. This gives developers an unfair advantage because communities don't have the same resources or expertise. Clearer guidelines are needed to make the consultation process accessible so that everyone can fully participate and help shape their local area. A fairer system is essential to give communities a real voice.

The government should focus on economic growth, but it shouldn't allow poorly planned developments to harm the environment, society, or the economy.

The proposed reforms may not only damage rural areas but could also slow down progress toward the government's goals for housing and economic growth.

Research shows there is plenty of space for new housing without harming the environment. Over 1.2 million homes could be built on brownfield sites, and more than 1 million approved developments still haven't been started. There are also 1.5 million empty or derelict homes that could be renovated, 26 million unused bedrooms that could be rented out, and 165,000 empty commercial properties that could be turned into housing. The government should focus on these options before weakening Green Belt protections and environmental rules.

The NPPF claims to protect Green Belt land, saying it should only be changed in "exceptional circumstances." At the same time, it stresses the need to meet housing targets and promote economic growth. This creates a conflict where local authorities may feel pressured to release Green Belt land to meet housing demands, even though it's supposed to be protected. This is a contradiction between protecting the Green Belt and the push for more homes.

The NPPF often uses vague terms like "should," "encourage," and "consider." These can be interpreted differently by local authorities and developers, leading to inconsistency. There should be stronger, clearer language to make key policies, such as Green Belt protection and flood risk

management, mandatory rather than optional. These vague terms might also make it challenging for planners to withstand pressure from developers, or alternatively, it could make it simpler for planners who are not diligent to approve developments which are unsustainable.

The NPPF encourages local authorities to enforce planning rules but doesn't offer enough support or tools to ensure that happens. Stronger enforcement measures are needed to make sure developers stick to the rules, especially when it comes to environmental standards and infrastructure.

Finally, the NPPF focuses heavily on economic growth, which might sometimes come at the cost of environmental and social goals. This un-strategic approach risks prioritising short-term economic benefits over long-term sustainability and the well-being of communities.

Comments in Relation to Chapter 2 – Policy objectives

The policy about "acting swiftly" and making decisions quickly is concerning. It suggests the government isn't willing or able to fully consider the impacts of its policies.

The NPPF claims that communities will still have a say in shaping housebuilding in their areas, but the focus on speeding up development contradicts this. How can communities have real input if decisions are rushed? It feels like the outcome is already decided, which goes against the Gunning principle of fair consultation.

The NPPF says there is commitment to protecting the Green Belt, but at the same time, the rules are being changed around what the Green Belt is. That does not make sense.

There's too much emphasis on traditional economic development methods, which often lead to the wasteful and inefficient use of rural land and natural resources.

Comments in Relation to Chapter 3 – Planning for the homes we need

Basing housing need figures on existing housing stock doesn't make sense and ignores the real issues with housing supply and delivery. This approach could seriously harm valuable countryside areas.

Building on protected land won't solve the housing shortage, especially when it comes to truly affordable homes.

The real problem is in the housing market, where developers focus on profit, leading to a lack of enough housing. This isn't an issue with the planning system itself.

There's also the ongoing problem of more social housing being sold off than is being built. Fixing the housing crisis shouldn't mean losing countryside or building homes in unsuitable places.

Comments in Relation to Chapter 4 – A new standard method for assessing local housing needs

Housing targets in Local Plans should consider local factors like population trends and household needs.

Basing housing requirements on the number of existing homes isn't sustainable. Housing demand is driven by people and households, not by how many buildings there are, so assessments need to reflect that.

The extra adjustment for affordability seems like an arbitrary number, chosen to fit the national target of 300,000 homes per year set by the previous government.

The standard method for calculating housing need produces figures that are completely unrealistic.

The NPPF promotes sustainable development as a key goal, but it also allows local authorities flexibility to make decisions based on local needs. While this flexibility is useful, it might lead to choices that prioritise short-term economic growth over long-term sustainability, which could go against the document's larger sustainability goals.

The NPPF encourages localism, aiming to involve communities in the planning process. However, the pressure to meet national housing targets may override local concerns, resulting in decisions that don't reflect what local people want or need. This creates a conflict between the idea of localism and the need to meet national development goals.

The heavy focus on hitting housing targets, which are often set at a national level, can limit the autonomy of local planners. This could lead to developments that don't align with local needs or environmental constraints. Local authorities need more flexibility to adjust housing targets based on their specific conditions, like infrastructure limits and environmental factors.

Although the NPPF talks about involving communities, the strong emphasis on housing targets and sustainable development might overshadow local input. The NPPF should give more real power to communities, particularly by supporting neighbourhood planning and community-led development projects.

The NPPF doesn't offer clear guidance on how local authorities should track the long-term impacts of developments on communities and the environment. Stronger monitoring requirements are needed, along with ways to address any negative impacts that arise after projects are finished.

According to the Office for National Statistics (ONS), without international migration, England's population would likely be shrinking. Birth rates have slowed, and by the mid-2030s, deaths will outnumber births. In 2023, population growth was mostly due to international migration. This raises questions about why the government is pushing for large-scale housing developments, which may not match local population needs.

If the government is planning for migration or relocation to different regions, it overlooks the preferences of many city residents. People who are used to city life might not want to move to rural areas, which often lack the amenities and services they rely on. If urban housing associations acquire homes in rural areas, people on housing waiting lists might feel forced to move, even if it means leaving behind their communities. This could lead to dissatisfaction and difficulties integrating into new areas.

This approach risks breaking apart community cohesion and doesn't consider the real needs and desires of both urban and rural populations. A more thoughtful housing strategy is needed, one that considers demographic realities and the importance of keeping communities strong and vibrant.

Comments in Relation to Chapter 5 – Brownfield, grey belt, and the Green Belt

More effort is needed to clearly define what "grey belt" means.

Developers have a strong incentive to let countryside they control fall into disrepair, turning it into "grey belt" land.

The Government should make it clear that if "grey belt" land is released for development, stronger protections must be put in place for the remaining Green Belt, in line with their promise to protect current designations.

The proposed NPPF changes and the Written Ministerial Statement don't provide enough guidance on identifying land that contributes little to the Green Belt. This could lead to inconsistencies between neighbouring Local Plans.

The NPPF encourages the reuse of brownfield sites, aligning with sustainable development goals. However, it also allows Green Belt land to be released in certain situations, such as when housing needs can't be met otherwise. This dual approach creates a potential conflict, where the push to meet housing targets could lead to the unnecessary use of Green Belt land, despite the preference for brownfield development.

Several terms in the NPPF, like "exceptional circumstances" and "very special circumstances," are not clearly defined. This lack of clarity can lead to inconsistent interpretations and should be addressed with clearer definitions to reduce loopholes.

Paragraph 142 of the NPPF says that "exceptional circumstances" include situations where an authority can't meet its housing needs. We do not believe this 'need' has been clearly justified by the government. For example, the Standard Method was calculated using 2014 data from the Office for National Statistics (ONS), but more recent ONS reports from 2016, 2018, and the census shows lower housing needs, especially in the South and Southeast of England. So, is releasing Green Belt land really an "exceptional circumstance" when more recent data suggests less housing need?

Annex 4 of the NPPF is unclear and overly complex. The complicated language and structure suggest a lack of clarity in the concept itself. This complexity could allow developers to exploit the rules, potentially threatening Green Belt protections. Simplifying and clarifying this section would help prevent misinterpretation and ensure fairer development decisions while still protecting the Green Belt.

The NPPF doesn't do enough to address the evolving needs of modern working practices, such as flexible working and the impact of the Covid pandemic. Many urban areas have underused office spaces, yet the NPPF doesn't explicitly mention the need to survey these under-occupied business areas. While it promotes using brownfield sites, it should more clearly focus on repurposing these underused spaces to meet current challenges.

Comments in Relation to Chapter 6 – Delivering affordable, well-designed homes and places

Requiring 50% affordable housing on land removed from the Green Belt is a positive step, but there's no clear plan on how this will be implemented.

The current definition of "affordable" housing—set at 80% of market price—is too expensive for many people. It should be adjusted to reflect local median incomes for a more realistic approach.

Developers can still use the viability "loophole" to reduce their commitments to affordable housing. This will likely result in fewer genuinely affordable homes being built, undermining the government's goals.

The NPPF encourages affordable housing by asking local plans to specify how much is needed and what types should be built. However, developers can challenge these requirements if they claim meeting them would make the project financially unviable. This can lead to fewer affordable homes being built. One solution could be to require developers to build the affordable housing first before proceeding with the rest of the development.

The NPPF mentions affordable housing but allows too much flexibility, which often leads to homes that aren't truly affordable for local residents. It should set stricter rules about the proportion of affordable housing in new developments and give a clearer definition of affordability that fits the local context.

The NPPF focuses more on affordable housing through market mechanisms and shared ownership schemes, but we believe there should be stronger support for social housing, especially for vulnerable groups and people on low incomes.

Comments in Relation to Chapter 7 – Building infrastructure to grow the economy

Strategic planning should address all aspects of sustainable development, not just focus on traditional economic growth, which can harm the environment.

Prioritising large infrastructure projects like gigafactories and data centres threatens protected rural areas in various regions.

The NPPF emphasises aligning development with infrastructure, but it also pushes for quick approval of developments under the presumption of sustainable development. This could lead to developments being approved without the necessary local infrastructure in place, contradicting the goal of ensuring communities have the services they need.

While the NPPF encourages directing development away from high flood-risk areas, it still allows for building in these places if safety can be ensured. Whilst focusing too much on the short-term this flexibility might lead to developments that increase flood risks, particularly in areas already vulnerable to flooding. With predicted climate change impacts there needs to be more emphasis on the long-term impacts created by building in flood zone areas.

The NPPF supports sustainable drainage systems (SuDS) but does not make it mandatory to use permeable surfaces as part of these systems. Requiring permeable surfaces would improve the effectiveness of SuDS in managing water and reducing flood risks. Strengthening this requirement would give local authorities more support in ensuring developments use sustainable water management practices. It should also be noted SuDS are not as effective as the natural permeable land in flood zones, the destruction of which should not easily be granted.

Although the NPPF encourages the use of SuDS, it doesn't make them mandatory. Given the increasing flood risks due to climate change, SuDS should be compulsory for all new developments to better manage water and reduce flood hazards.

The NPPF talks about the need for infrastructure to support new developments but lacks strong mechanisms to ensure infrastructure is ready before or alongside new projects. This can lead to developments going ahead without sufficient infrastructure, placing extra strain on existing services. The NPPF should require that infrastructure, such as transport, schools, healthcare, and flood defences, are fully funded and scheduled before planning permission is granted for large developments.

The NPPF mentions avoiding developments in flood-prone areas but doesn't push for more comprehensive flood risk assessments in areas already at risk. It should require detailed flood risk assessments for all developments in these zones and limit building in such areas unless strong mitigation measures are in place.

Comments in Relation to Chapter 8 – Supporting green energy and the environment

Using protected land like the Green Belt or valuable agricultural areas for ground-mounted solar panels is inefficient and unsuitable, especially when considering the impacts on scenery, wildlife, and biodiversity.

The NPPF misses an opportunity to push for more solar panels on large developments. While it supports renewable energy, it doesn't specifically encourage solar installations on large buildings like supermarkets, industrial estates, or distribution centres, which have plenty of roof space. Using these spaces for solar panels would reduce the need to install them on agricultural land, helping protect food security. Though there are construction costs to consider, making solar panels part of national infrastructure could come with financial incentives, like subsidies, to help offset the costs. Clearer guidance in the NPPF on this would maximise renewable energy potential while minimising the use of valuable agricultural land.

High-quality agricultural land (Grades 1, 2, and 3a) should be preserved for farming and only developed in rare cases to support the UK's goal of improving food security.

The NPPF emphasises the need for planning policies to mitigate and adapt to climate change, which is essential for long-term sustainability. However, it also gives local authorities a lot of flexibility in how they meet development needs, which could lead to inconsistencies in how climate change mitigation is prioritised across different areas. Some areas may place less emphasis on it due to immediate development pressures. For areas in a flood zone, mitigation must be mandatory and the management of these solutions properly managed.

While the NPPF addresses climate change, it doesn't go far enough in requiring stricter measures for carbon reduction, energy efficiency, and renewable energy in new developments. It should mandate higher environmental standards, such as net-zero carbon buildings and stronger commitments to biodiversity net gain.

The protections the NPPF offers for environmentally sensitive areas, like Sites of Special Scientific Interest (SSSIs) and Areas of Outstanding Natural Beauty (AONBs), could be seen as weak, especially given housing and development pressures. These protections should be strengthened to ensure they aren't easily overridden by economic or housing demands.