

Planning Committee

07 February 2025

Agenda item number 12

National Planning Policy Framework - Briefing

Report by Planning Policy Officer

Summary

The new National Planning Policy Framework (NPPF) has been published. This paper highlights the main changes.

Recommendation

That Members note the report and commentary.

Contents

1.	Introduction	1
2.	Standard method for assessing local housing need	2
3.	Five-year housing land supply	2
4.	Green belt	3
5.	Local character and design coding	4
6.	Presumption in favour of sustainable development	5
7.	Strategic planning	5
8.	Affordable housing	6
9.	Supporting economic growth and clean energy	6
10.	Infrastructure	7
11.	Intervention, fees and transitional arrangements	7
12.	Next steps	8

1. Introduction

- 1.1. On 12 December 2024, the new [National Planning Policy Framework \(NPPF\)](#) was released. This paper highlights some key changes and provides some commentary in italics where appropriate.

- 1.2. The wording in this report is taken from the Planning Resource article: [33 things you need to know about the final version of the revised NPPF | Planning Resource](#) (log in required).

2. Standard method for assessing local housing need

- 2.1. The **new NPPF**, at paragraph 62, directs that strategic policies should be informed by a **local housing need assessment conducted using the government’s standard method**. The changes propose to remove reference to the method being ‘an advisory starting point’, as well as removing reference to the ability of councils to use ‘exceptional circumstances’ to argue for the use of alternative approaches to assess need.
- 2.2. **Local planning authorities are instructed to “meet an area’s identified housing need”**. This is in comparison with the previous wording in paragraph 60, which instructed councils to “meet as much of an area’s identified housing need as possible”. The word ‘sufficient’ in the context of providing for housing is removed from paragraph one.

The Government’s standard method does not apply to the Broads. We have produced our own Local Housing Need Assessment.

3. Five-year housing land supply

- 3.1. **Changes made to the five-year housing land supply policy in December 2023 - including the ability to show a four rather than five-year housing land supply in certain cases - are reversed with the deletion of former paragraphs 77 and 78.** The general requirement for local planning authorities to include a buffer of five per cent on top of their five-year housing land supply, is retained in paragraph 78, “to ensure choice and competition in the market for land”.
- 3.2. **A 20 per cent buffer will be applied on top of local authorities’ five-year housing supply in some cases, for decision-making.** This will apply where there has been significant under-delivery of housing over the previous three years, the NPPF says.
- 3.3. **A 20 per cent buffer on top of five-year housing supply will also apply more widely for some authorities for decision-making purposes from 1 July 2026.** It will apply where a local planning authority has a housing requirement adopted in the last five years examined against a previous version of the NPPF, and whose annual average housing requirement is 80 per cent or less of the most up-to-date local housing need figure.
- 3.4. **The new NPPF removes 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 new framework also removes the option for LPAs to ‘fix’ their five-year housing land supply through annual position statements.

These buffers will apply to us when we produce the Five Year Land Supply Statement, but the ‘punishment’ of the presumption in favour of sustainable development does not apply to the Broads.

4. Green belt

- 4.1. **LPA should undertake a green belt review where they are unable to meet their identified needs for housing, commercial or other development through other means, the NPPF says.** “If that is the case, authorities should review green belt boundaries...and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.”
- 4.2. **The revised document introduces the concept of ‘grey belt’ land within the green belt and clarifies that it would not include land which “strongly” contributes to three of the green belt purposes.** Wording in the glossary of the NPPF defines grey belt as land in the green belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) (as set out in paragraph 143). These are the purposes which seek to check unrestricted sprawl, prevent merging of towns and preserve the setting of historic towns. (However, it does not include the purpose of safeguarding the countryside from encroachment.) ‘Grey belt’ would also exclude land covered by key constraints such as national landscapes and SSSIs.
- 4.3. **Where it is necessary to release green belt land for development, plans should give priority to previously developed land, then consider grey belt, which is not previously developed, and then other green belt locations,** the framework says in paragraph 148. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site’s location is appropriate, it adds.
- 4.4. **The development of homes, commercial and other development in the green belt should not be regarded as inappropriate in certain circumstances,** the NPPF says. This is where the following criteria apply:
 - The development would be on grey belt land and would not fundamentally undermine the purposes of the remaining green belt across the area of the plan.
 - There is a “demonstrable unmet need for the type of development proposed” (defined in relation to housing supply and delivery).
 - The development would be “in a sustainable location”.
 - The development proposed meets the ‘golden rules’ requirements.
- 4.5. **The following ‘golden rules’ would be applied to major housing development on land released from the green belt (set out in paragraph 156):**

- Affordable housing contribution which would be 15 percentage points above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50 per cent. In the absence of a pre-existing requirement for affordable housing, a 50 per cent affordable housing contribution should apply by default. The use of site-specific viability assessment for land in or released from the green belt should be subject to the approach set out in planning practice guidance, the framework states.
- Necessary improvements to local or national infrastructure,
- The provision of new, or improvements to existing, local green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their homes, whether through onsite provision or through access to offsite facilities, the framework says.

A development which complies with the Golden Rules should be given significant weight in favour of the grant of permission, the NPPF states.

- 4.6. **Development proposed on previously developed land in the green belt, and limited infilling in the green belt, is now classed as ‘not inappropriate development’**, as long as it doesn't cause “substantial harm to the openness of the green belt”.

None of these changes affect the Broads as it does not have a green belt.

5. Local character and design coding

- 5.1. **Paragraph 130 of the previous NPPF**, which was added to state that local character can be taken into account when councils consider their ability to meet their housing needs, **is deleted.**
- 5.2. **Wording changes to in paragraph 138 state that the National Model Design Code is “the primary basis for the preparation and use of local design codes”** and removes the preference in the previous NPPF for the preparation of local design codes being the primary means for assessing and improving design of development.
- 5.3. **Changes made in 2023 to the NPPF that reference “beauty” and “beautiful” in relation to well-designed development are reversed, with the word removed from the title of chapter 12.** The framework also clarifies that national policy is strongly supportive of all upward extensions, including mansard roofs (in paragraph 125e).
- 5.4. **Brownfield developments should be viewed positively, the NPPF says.** Wording in the document to emphasise this point has, however, been tweaked from the suggestion in the draft framework that such proposals “should be regarded as acceptable in principle.” The new wording in the final document is that proposals should be approved “unless substantial harm would be caused”.

- 5.5. **The definition of previously developed land in the glossary now includes “large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed.”** But glasshouses are not included in the definition.

The Authority’s Design Guide continues to be produced and is currently out for consultation.

6. Presumption in favour of sustainable development

- 6.1. **In a tweak to the presumption in favour of sustainable development, the NPPF says that for decision-taking, schemes should be granted permission unless policies in the framework provide a “strong” reason for refusal.** The previous version stated that such policies should provide a “clear” reason for refusal.
- 6.2. **The new version of the presumption also adds explicit reference to the need to consider key policies.** These are listed as those for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes.

Noted.

7. Strategic planning

- 7.1. **Local planning authorities and county councils “continue to be” under a duty to cooperate with each other, the new NPPF says.** “Effective strategic planning across LPA boundaries will play a vital and increasing role in how sustainable growth is delivered, by addressing key spatial issues including meeting housing needs, delivering strategic infrastructure, and building economic and climate resilience,” it says. Paragraph 25 sets out the relevant bodies for collaboration on strategic plans, with reference to local enterprise partnerships now deleted.
- 7.2. **Once the matters for collaboration have been identified, new paragraph 27 states that authorities “should make sure that their plan policies are consistent with those of other bodies** where a strategic relationship exists on these matters, and with the relevant investment plans of infrastructure providers, unless there is clear justification to the contrary”. In particular, plans should ensure that:
- a consistent approach is taken to planning the delivery of major infrastructure;
 - unmet development needs from neighbouring areas are accommodated; and
 - any allocation or designation which cuts across the boundary of plan areas “is appropriately managed by all relevant authorities.”

The NPPF acknowledges that plans come forward at different times and that there can be a degree of uncertainty over other plans. In such circumstances, it states, those preparing plans “will need to come to an informed decision on the basis of available information, rather than waiting for a full set of evidence from other authorities.”

We continue to work closely with our district and county councils. An updated Norfolk Strategic Framework is being produced. A duty to cooperate statement to support the emerging Local Plan for the Broads will come to a future Planning Committee.

8. Affordable housing

- 8.1. **Housing needs assessments should explicitly consider the needs of those requiring social rent, the NPPF says.** It states that authorities specify their expectations on social rent delivery as part of broader affordable housing policies. Reference is also added in the new document to assessing the needs of 'looked after children', which a footnote says can be evidenced in the relevant LPA's Children's Social Care Sufficiency Strategy.
- 8.2. **The requirement to deliver at least ten per cent of the total number of homes on major sites as affordable home ownership, as set out in the previous NPPF, is removed.**
- 8.3. **New wording in the framework expects LPAs to take a positive approach to development proposals that have a mix of tenures and types, through both plans and decisions.** New paragraph 69 states that mixed tenure sites can provide a range of benefits "including creating diverse communities and supporting timely build out rates". LPAs, it says, "should support their development through their policies and decisions." It recognises, however, that this should not preclude schemes that are mainly, or entirely, for Social Rent or other affordable housing tenures from being supported.

Noted.

9. Supporting economic growth and clean energy

- 9.1. **Local planning authorities should pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics, the NPPF says.** Planning policies and decisions should make provision for new, expanded or upgraded facilities and infrastructure to support the growth of knowledge and data-driven, creative or high technology industries, including data centres and grid connections, it states.
- 9.2. **The framework, at paragraph 87, says storage and distribution operations should be provided for "that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation".** The same paragraph also includes new text that provision should be made for "the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience."
- 9.3. **Decision-makers should give "significant weight" to the benefits associated with renewable and low carbon energy generation, and proposals contributing to meeting a net zero future, it says at paragraph 164.** However, wording in the draft which stated

that local planning authorities should support planning applications for all forms of renewable and low carbon development has not been included in the final document.

- 9.4. **Authorities should consider identifying suitable areas for renewable and low carbon development when producing plans**, where it is likely that in allocating a site, it would help secure development, it states.
- 9.5. **The need to mitigate and adapt to climate change should also be considered in preparing and assessing planning applications**, taking into account the full range of potential climate change impacts, new paragraph 163 of the document says.

Noted.

10. Infrastructure

- 10.1. **“Significant weight” should be placed on the importance of facilitating new, expanded or upgraded public service infrastructure when considering proposals for development, new wording in paragraph 101 says.** The framework also includes reference to post-16 education places to support the delivery of this type of education provision.
- 10.2. **Development proposals and allocation of sites should ensure that sustainable transport modes are prioritised, taking account of the vision for the site, the NPPF says.** Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residential cumulative impacts on the road network following mitigation, would be severe, “taking into account all reasonable future scenarios”, paragraph 116 states.

Noted.

11. Intervention, fees and transitional arrangements

- 11.1. **The new NPPF applies straight away for decision-making.** However, existing policies are not necessarily out of date and “due weight” should be given to them. Policies should not be regarded as out of date where LPAs meet certain criteria relating to housing supply and delivery. **Where** a local planning authority has confirmed its housing land supply position for a year through a published Annual Position Statement that has been examined by the Planning Inspectorate against the previous version of this Framework, this position will stand until the Annual Position Statement expires, the framework states.
- 11.2. **For plan-making, the new NPPF applies from 12 March 2025.** This is with the exception of the following cases:
- Where the plan has reached the Regulation 19 stage of consultation on or before 12 March 2025, and its draft housing requirement meets at least 80 per cent of local housing need

- Where the plan is submitted for examination on or before 12 March 2025
- Plans which include policies to deliver levels of housing and other development set out in a preceding local plan adopted since 12 March 2020
- The local plan is in an area where there is an operative Spatial Development Strategy and the local plan has reached Regulation 19 stage on or before 12 March 2025.

Our proposed timeline will be to submit in July 2025 so the Local Plan will be prepared under the current Local Plan system but assessed under this new NPPF.

12. Next steps

12.1. Officers will assess the changes to the NPPF and reflect them in the emerging Local Plan. It is intended to bring the Regulation 19 version of the Local Plan to Planning Committee and Broads Authority in March 2025 for endorsement for consultation.

Author: Natalie Beal

Date of report: 20 December 2024