

# **Proposed National Planning Policy Framework (NPPF) reforms consultation and other changes to the planning system**

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**Growth and Regeneration Scrutiny Panel**

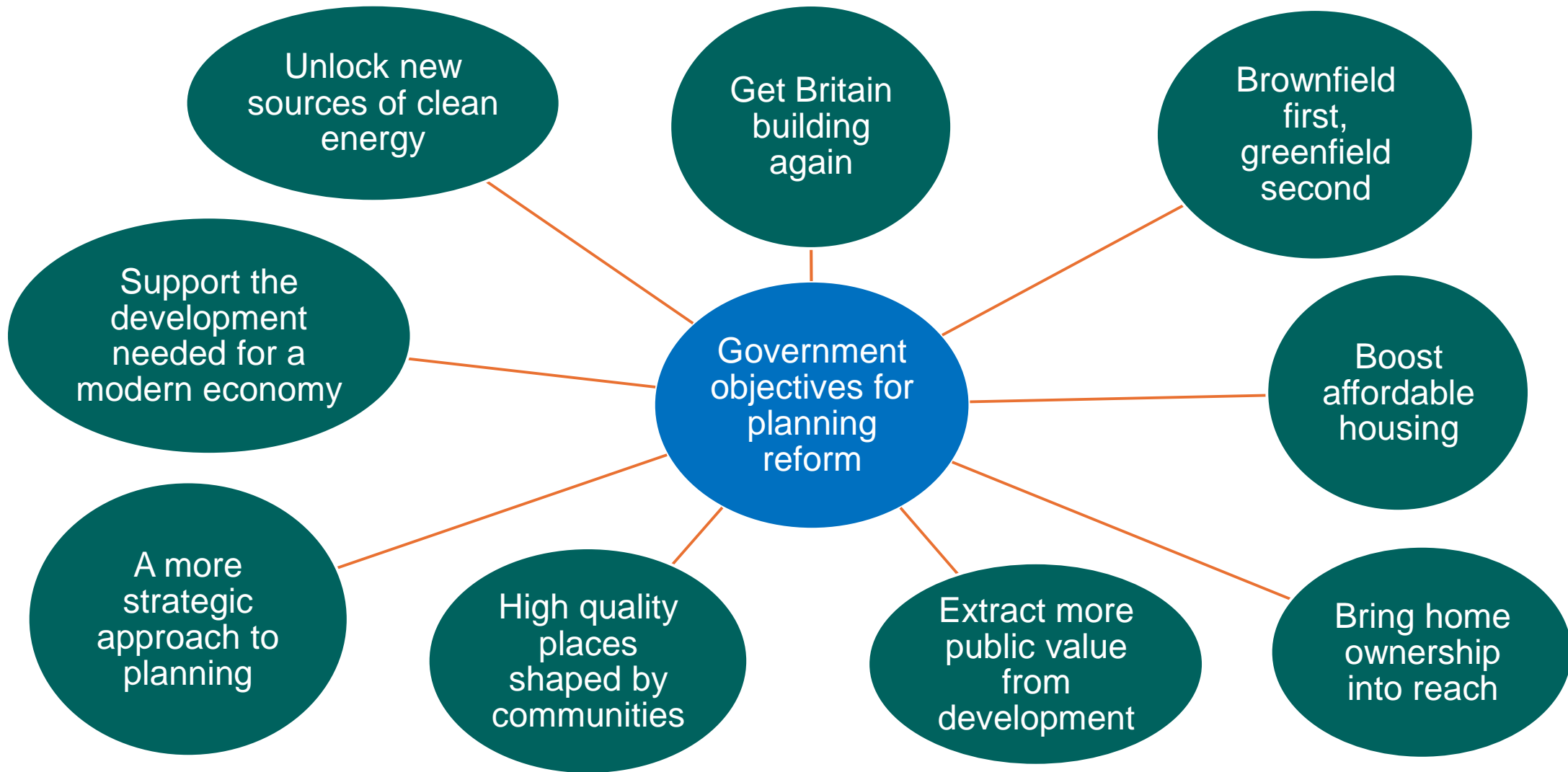
**4<sup>th</sup> November 2024**

# Summary of key implications

Purpose of today – outline key reforms and implications for the Local Plan

- A Local Plan at pace is a must (Dec 2026 submission requirement).
- Annual housing need increase from 1,730 to 2,043. Delivery over last 3 years is 708, 985, 1,276.
- Proposed strategic planning will determine how unmet needs are delivered.
- Additional land take will be needed to deliver economic growth.
- Brownfield first/grey belt focus will not remove the need to consider green belt land.

# Government objectives for planning reform



# How the Government plans to achieve these objectives - Initial proposals

## **Proposed NPPF reforms consultation and draft NPPF.**

- Consultation on 106 questions.
- Deadline for comments - 24<sup>th</sup> Sept 2024.
- Planned final version Dec 2024/Early 2025.
- Reversal of some NPPF 2023 changes and additional changes.

## **Other key statements**

- Letter from Deputy PM/MHCLG – playing your part in building the homes we need (July 2024).
- Government press release: Housing targets increased.
- Policy statement on new towns (July 2024).

## **Further consultations**

**Planning and Infrastructure Bill** – planned to follow finalised NPPF with further reforms to accelerate delivery of infrastructure and housing.

**National Development Management policies** – consultation on a suite of national policies that all local authorities will be required to follow. Potential for revised Planning Policy for Waste and Traveller sites.

**Implementation of new plan-making system** from summer/autumn 2025.

# Increased focus on Local Plan

- Universal coverage of Local Plans.
- Once in place, they must be kept up to date.
- Revised intervention powers to ensure Local authorities do not delay process.
- New timetables for Plan production (transitional arrangements).

## Implication

Kirklees would be required to submit an updated Local Plan for examination by December 2026.

## Kirklees Local Plan

Kirklees Local Plan  
Strategy and Policies

Adopted 27 February 2019



# Local Plan timetable

Timetable and milestones	Dates	Purpose of the stages and role of communities/partners/stakeholders
<b>Early engagement phase 1: Issues, vision, what policies you want to see in the Plan</b>	November 2024	<ul style="list-style-type: none"> <li>• Respond to the early engagement and raise awareness.</li> <li>• Outline any evidence to support local issues and policies (reports or your own consultations).</li> <li>• Review existing policies and scope any new areas.</li> <li>• Outline any good practice.</li> </ul>
<b>Early engagement: phase 2: development levels, draft options</b>	April – May 2025	<ul style="list-style-type: none"> <li>• Further opportunities to scope whether the development strategy supports active communities.</li> </ul>
<b>Draft Plan Consultation</b>	Sept-Nov 2025	<ul style="list-style-type: none"> <li>• Get involved in and contribute to public consultation and help raise awareness.</li> </ul>
<b>Publication Draft Consultation</b>	Sept-Nov 2026	<ul style="list-style-type: none"> <li>• Get involved in and contribute to public consultation and help raise awareness.</li> <li>• Provide supporting evidence when required in a form that the can be used in the Examination in Public process.</li> </ul>
<b>Submission to Secretary of State</b>	March 2027	<ul style="list-style-type: none"> <li>• Where appropriate attend examination and assist the council with supporting the Local Plan proposals.</li> </ul>

# New method to determine housing requirements

## What is being proposed?

- A new standard method - based on **housing stock** (0.8%) and adjusted to reflect **housing affordability**

## Other changes to method

- **No cap** – restricting assessed need does not align with housing ambitions.
- **No urban uplift** – considered arbitrary by many in the sector. Focused on ‘most populous’ urban LPA only (as opposed to surrounding hinterlands) - and does not account for future growth ambitions of smaller urban areas.

## Use of the standard method

- **The standard method will be mandatory.**
- Para 61 - **remove reference to exceptional circumstances** to use an alternative approach.
- Exceptions will be set out in PPG for National Parks, Isles of Scilly

# Implications for Kirklees

- A 30% increase from 1,595 dwellings per annum (dpa) (uplifted to 1,730 dpa) in current Local Plan to **2,043**.
- Over the Kirklees Local Plan period 2024-2043, **38,817** homes required.
- All adjoining authorities' requirements have increased with exception of Bradford.
- Role of strategic planning in determining how unmet need be delivered is unknown.
- The focus on authorities being able to determine the levels and type of affordable housing is welcomed.
- Need to find land for employment as well as housing requirements.
- Development constraints – typography, environmental designation, flood risk areas, part of National Park.

LA name	Current method	Proposed method	Average annual net additions
Bradford	2,232	2,089	1,026
Calderdale	742	964	351
<b>Kirklees</b>	<b>1,595</b>	<b>2,043</b>	<b>796</b>
Leeds	3,987	4,159	2,983
Wakefield	923	1,721	1,376
<b>Total</b>	<b>9,480</b>	<b>10,976</b>	<b>6,532</b>



# Strategic Planning

## Why Strategic Planning?

- To deliver sustainable growth and address key spatial issues: housing needs (including unmet housing needs), delivering strategic infrastructure, building the economy and improving climate resilience.

## Three Immediate Steps to Strategic Planning

1. Strengthening NPPF on cross boundary strategic planning and co-ordination.
2. Working with Mayors to extend existing powers to develop Spatial Development Strategies.
3. Identifying priority groupings of other authorities where strategic planning would provide benefits.

## Implications for Kirklees

- Unknown implications if any on Local Plan timetable as strategic planning subject to legislation.
- Potential impact on resources (staff/budget) to support.



# Brownfield, 'Grey Belt' and the Green Belt

## Key Principles

- Take a brownfield-first approach and then release low quality “grey belt” land.
- Requirement to review boundaries and release Green Belt land where necessary to meet unmet housing or commercial need.
- Definition of Grey belt – “land in the green belt comprising previously developed land and other parcels and/or areas of Green Belt that make a limited contribution to the five purposes of GB (NPPF para 140) but excluding those areas or assets of particular importance listed in NPPF footnote7).
- Release of Grey Belt should be in sustainable locations, provide “Golden Rule” contributions (at least 50% affordable including social rent, infrastructure and improvements to accessible, local green space and not impact on Green Belt function.

# Implications for Kirklees

- 68% of Kirklees is Green Belt.
- Lack of available and suitable brownfield land for development leading to consideration of Grey Belt and Green Belt.
- Housing, commercial, and other development on Grey Belt is not considered inappropriate where a local authority cannot demonstrate a five-year supply of deliverable housing sites.
- Risk of increased speculative development on Grey Belt sites. Lack of clarity on sustainable locations and guidance on Grey Belt will increase pressure on development management decisions to ensure consistency.
- Green Belt Parcel Analysis has been commissioned as part of Local Plan update.

# Reforming planning fees

## Reforms include:

- Proposing to increase the fee for householder applications to meet cost recovery levels
- Seeking views on increasing and introducing fees for other application types
- Seeking views on two possible models that would allow local authorities to set fees (national subject to local variations or fully set by local authority.
- Seeking views on increasing fees to fund wider planning services

## Why change:

- Current planning fees do not generate enough income to cover costs, results in funding shortfalls and delays in determining planning applications
- Enable authorities to cover the actual costs specific to that authority in determining planning applications
- Introduce greater accountability and transparency to the planning fees system

# Additional changes to NPPF

- Requirement for well-designed development. Removal of beautiful.
- Supporting economic growth in key sectors (data centres, gigafactories and laboratories).
- Supporting skill development through post-16 education places.
- A vision-led approach to transport.
- Delivering community needs and healthy communities.
- Support for clean energy and the environment – views sought.



# What do the reforms mean for Local Plan progress (1)

Progress to date	Implications/How we are managing risks
<p>Local Plan Timetable</p> <ul style="list-style-type: none"><li>• Our Local Development Scheme(LDS) adopted March 2024 identifies a submission date of March 2027.</li><li>• NPPF reforms are proposing a submission date of December 2026.</li></ul>	<ul style="list-style-type: none"><li>• Concerns raised as part of NPPF consultation on the deadline as outcomes of the consultation unknown.</li><li>• A meeting has been set up with the Planning Inspectorate and Planning Advisory Service to sense check progress.</li><li>• Following confirmation of deadline for submission, a revised LDS will need to be presented to Cabinet.</li></ul>
<p>Evidence gathering</p> <ul style="list-style-type: none"><li>• Procurement of specialist evidence including: Strategic Housing Market Assessment, Travellers, Employment Land Study, Green Belt, Retail and leisure, Minerals, Waste needs, Strategic Flood Risk Assessment, Sustainability appraisal.</li><li>• Cross service/partner working to identify issues and evidence.</li></ul>	<ul style="list-style-type: none"><li>• Outcomes of NPPF consultation will not be available until December 2024. All procurements will review evidence in the light of changes to NPPF/legislation. For example, Strategic Housing Market Assessment will consider both the existing and proposed new standard method. There may be a need to look at alternative scenarios.</li><li>• The reforms are seeking views on climate change policy. This may require further evidence/viability assessments. Looking at good practice – Central Lincolnshire and working with Huddersfield University.</li></ul>

# What do the reforms mean for Local Plan progress (2)

Progress to date	Implications/How we are managing risks
<p>Policy review (ongoing)</p> <ul style="list-style-type: none"><li>• Review of existing Local Plan policies and scoping new based on cross service/partner working and national planning policy requirements. Emphasis on climate change.</li><li>• Regional working with West Yorkshire Combined Authority (WYCA) and adjoining authorities on areas of new policy including: Local Nature Recovery Strategies, Biodiversity Net Gain.</li><li>• Potential SDF on mass transit to be produced by WYCA</li></ul>	<ul style="list-style-type: none"><li>• Proposed National Development Management Policies will be consulted on following finalised NPPF. Dependent on policy content, this will require a further review of Kirklees policies.</li><li>• The NPPF reforms are seeking views on the role that Local Nature Recovery Strategies could play in identifying areas of Green Belt which can be enhanced. To be considered through ongoing work.</li><li>• Potential resource implications to support SDF work to shape policy content and align with evidence on the Kirklees Local Plan.</li></ul>
<p>Call for sites - Inviting submission of sites for development or potential protection e.g. local green spaces (ongoing).</p> <ul style="list-style-type: none"><li>• Landowners of existing undeveloped allocations contacted.</li></ul>	<ul style="list-style-type: none"><li>• The reforms do not impact on the call for sites process but outcomes on housing requirements, sequence of land to be developed will impact on the consideration of the sites as part of the development of the spatial strategy.</li></ul>

# Questions