

National Planning Policy Framework (NPPF) Consultation
Ringmer Parish Council's response (Our ref: 10/09/24, Item 13.)

Consultation questions on the 'standard method' and housing targets

- Q 1: **Reversal of 2023 changes to para.61.** No. It is now proposed that the new baseline number should be a percentage of existing housing. It will not always be appropriate to put new houses where existing houses are. This change increases the need for discretion according to a council's particular position.
- Q 2: **Alternative approaches.** No.
- Q 3: **Abolishing para.62.** No. The idea behind the 2023 change, to increase new housing at the most sustainable locations, was a good one. It was not very sensibly implemented. A better approach to achieving the desired aim is needed.
- Q 6: **High quality development.** Yes. This change is supported.
- Q 7: **5YHLS.** No. The Local Plan's job is to allocate appropriate sites for development. If a council's Local Plan is approved by PINS as meeting this test it should be protected from challenge during the plan period. If allocated sites are not brought forward they should be developed for affordable housing, to help meet the housing crisis
- Q 8: **Over-performance.** No. LPAs should be incentivised to over-deliver on their annual targets. This change would provide a perverse incentive to avoid over-delivery.
- Q 9: **Buffers.** No, there should not be a buffer, just the target.
- Q 10: **Buffers.** No.
- Q 12: **Duty to Cooperate.** The abolition of strategic planning was a mistake, and the duty to cooperate has proved an inadequate replacement. It should be abolished now and replaced by a proper strategic planning system.
- Q 15: **Baseline 'need' for the 'standard method'.** No. This is proposed to change from a central projection of household number to a different number based on actual current housing stock. Neither reflects actual local need. In Lewes District death rates exceed birth rates, so local 'need' is actually negative. Where houses were built in the past is not a good guide to where they are needed now. The proposed approach also ignores key issues such as water availability. A more professional way of assessing need, based on strategic planning, should be developed.
- Q16: **Affordability factor for the 'standard method'.** The proposed change is irrelevant. There is no good reason to include any such factor in the algorithm.
- Q17: **Affordability factor for the 'standard method'.** No. Inclusion of the affordability factor in the distorts housebuilding targets towards exactly those parts of England where strategic land companies can achieve the highest profits. High prices indicate a shortage of suitable land, so this gives councils with the least suitable land the highest housing targets! It also means that most new homes are built in exactly those parts of the country where they are least affordable. Removing the affordability factor from the algorithm would mean more new housing where people can actually afford it and where there is the most brownfield land available

- Q 20: **Brownfield land.** No. Lewes District has large urban Local Plan-allocated brownfield sites that have been awaiting development for years, while greenfield development proceeds apace. Current NPPF policies, especially the 'tilted balance', are responsible. Repeated government attempts to facilitate the use of sustainable brownfield sites have failed. This policy lacks any teeth
- Q 21: **Green Belt.** There is no Green Belt land in Lewes District, nor indeed in Sussex.
- Q 48: **10% affordable home ownership:** Yes. Viability varies across England, and between greenfield and brownfield development. This should be left to Local and Neighbourhood Plans.
- Q 50: **First Homes.** Yes. A concern with First Homes scheme is that in expensive areas (such as Lewes) 'First Homes' will become micro-homes with inadequate facilities, no private outdoor space and inadequate parking. A recent application in this village included 10 First Homes, all 1-bed flats with a single parking space. This is not useful to a working couple who might wish to start a family.
- Q 52: **Social rent affordable housing developments.** Greenfield developments in our area could provide a higher proportion of affordable-rented homes than the 30% currently required by the Local Plan, if a slightly higher proportion of the development gain currently taken by the landowner was this purpose. On a small scale in rural areas Exception Sites can make a useful contribution.
- Q 54: **Rural affordable housing.** Village communities should be encouraged to provide Exception Sites for rural affordable housing, to be delivered by registered providers or Community Land Trusts. Sites so allocated need to be protected from speculative market development. Developments in rural areas are often disproportionately affected by the exemption of developments of 10 or fewer units from the requirement to provide affordable housing. Speculative developers preferred use of rural greenfield sites is for small numbers of large executive homes, rather than the small affordable homes that are most desperately needed. Local and Neighbourhood Plans should be empowered to ensure local housing is prioritised.
- Q 56: **Community-led housing projects.** Yes. Community Land Trusts can be a force for good in villages, and could play a more prominent role. LPAs and Neighbourhood Plans should be empowered to allocate land for this purpose.
- Q 57: **Registered providers.** Yes. Community Land Trusts should qualify as registered providers.
- Q 58: **Small sites.** Yes. New small sites integrate rapidly into village communities and are usually delivered quickly. Developers prefer to sell large market sites to large housebuilders. The NPPF could require all new greenfield market developments of above a set size to include a percentage of the new homes to be delivered by small builders or made available for self-build or made available to Community Land Trusts. Alternatively, councils could include such policies in Local or Neighbourhood Plans.
- Q 69: **Transport infrastructure provision.** No. Where building on greenfield land in the countryside is encouraged this will inevitably increase dependence on the private cars. These cars need to be adequately provided for, unless and until there is evidence that transport modes have changed.
- Q 74: **Irreplaceable habitats.** Yes. All irreplaceable habitats must be protected.
- Q 83: **Food production.** Yes. Grade 1, 2 and 3 agricultural land should be given much stronger protection against conversion to other uses.

Q 87: **Local Plans.** No. One important reason that so many councils do not have current Local Plans is the continual changes in the NPPF and other planning policies by successive governments. The Lewes Local Plan was adopted in 2016 and expected to last until 2030. However, NPPF changes introduced in 2018 made it 'out of date' after 2021, and the regular NPPF changes made since then mean that Lewes has had no chance of getting a new Local Plan adopted. Lewes was just about to submit a Reg 19 consultation proposal, but now the rules are being changed yet again!

Q 103: **Local Plans.** No. It looks as if, in the light of the NPPF changes here proposed, that Lewes will now have to go back to the drawing board, leaving the District without an up to date Local Plan once again.