



**REPORT of
DIRECTOR OF SERVICE DELIVERY**

**to
COUNCIL
12 SEPTEMBER 2024**

NATIONAL PLANNING POLICY FRAMEWORK CONSULTATION RESPONSE

1. PURPOSE OF THE REPORT

- 1.1 To present to the Council the consultation response to the proposed changes to the National Planning Policy Framework (NPPF). The consultation commenced on 30 July 2024 and the closing date for responses is 24 September 2024.

2. RECOMMENDATION

That the Council approves the consultation response to the draft NPPF for submission to the Ministry of Housing, Communities and Local Government by the deadline.

3. SUMMARY OF KEY ISSUES

- 3.1 The consultation response to the proposed changes to the NPPF are set out at **APPENDIX A** of this report.
- 3.2 An earlier draft version of the consultation response was presented to the Planning Policy Working Group for discussion and input on 13 August 2024.
- 3.3 Whilst the draft NPPF proposes a number of changes to national policy and presents questions, for which most a formal response from Maldon District Council is proposed in **APPENDIX A**, the main change which will affect the District is the proposed alteration to the national Standard Method for calculating housing numbers. It is proposed to alter that methodology in such a way so that most local authorities in the country will see an increase in housing numbers for their areas. For the Maldon District, the housing number will move from 276 homes per annum to 544 homes per annum; a 97% increase. This in turn, will also become a mandatory target.
- 3.4 As can be seen from **APPENDIX A**, this increase in housing numbers will have a significant impact on the District. The proposed uplift in the amount of housing has nothing to do with local need and is 97% above what the previous figure from the Standard Method was calculated at. The previous figure was regarded as a reasonable number to plan for the growth of the District; it was almost identical with the Maldon District Local Housing Needs Assessment 2021 with an affordability uplift, and it aligned with the average number of houses that have been delivered in the District across the plan period from 2014 to the present. To meet this increase in housing growth, the population of the District will have to increase through greater in-migration. This means many of these potential migrants will then have to commute out to work because there is unlikely to be an accompanying uplift in job creation within the District. This will place additional pressure on transport infrastructure in

particular. Factoring in additional pressure on other infrastructure services such as the NHS, education and water, which are already under pressure, it would appear as if the ramifications of the proposed changes, not only for the Maldon District but for many parts of the country have not been thought through enough.

- 3.5 The draft consultation response has tried to set out why the changes to the Standard Method will simply not deliver what the Government is proposing which is a significant increase in new housing units across the country.
- 3.6 Members should also be aware that if the proposed changes to the NPPF take effect then the Council's 5-year supply of deliverable sites for housing will drop below 5-years. This would mean the 'tilted balance' would become engaged in determining applications for housing and there is therefore significant concern this will lead to planning by appeal, which is by its nature and unplanned approach to growth.
- 3.7 There is no indication in the proposed changes to the NPPF that there will be more funding for infrastructure with the proposed Infrastructure Levy that the previous government was going to bring in to replace Section 106 and Community Infrastructure Levy (CIL) has been dropped.

4. CONCLUSION

- 4.1 The NPPF consultation response is set out at **APPENDIX A** and the Council should use this opportunity to express its opinion on those changes and the impacts they could have on the District.

5. IMPACT ON PRIORITIES AS SET OUT IN THE CORPORATE PLAN 2023 - 2027

5.1 Enhancing and connecting our place

- 5.1.1 Responding to national policy consultations is a way in which the Council can seek to influence change in the District and mitigate the impact development has on the local area.

5.2 Helping the economy to thrive

- 5.2.1 Responding to national policy consultations is a way in which the Council can seek to influence economic change in the District and mitigate the impact development has on the local area.

5.3 A greener future

- 5.3.1 Responding to national policy consultations is a way in which the Council can seek to influence climate action in the District and mitigate the impact development has on the local area.

6. IMPLICATIONS

- (i) **Impact on Customers** – If the proposed NPPF changes on the housing number goes ahead there will be an impact on the whole District. There will be a mandatory housing target which the Council will find difficult to deliver and it will have an impact on already overstretched infrastructure.

- (ii) **Impact on Equalities** – None.
- (iii) **Impact on Risk (including Fraud implications)** – There is a risk to the Council of the proposed NPPF changes on the housing number goes ahead. The 5-year supply will drop to below 5-years, this will leave the Council open again to speculative unplanned for development. It is yet to be assessed, but there will also be a likely impact on the timetable of the Local Development Plan Review, though that may not be a significant impact and will depend on if and when changes are brought into effect.
- (iv) **Impact on Resources (financial)** – At the present time regarding the Local Development Plan Review it is not considered there has been any abortive work. It is likely that the Local Housing Needs Assessment will have to be updated earlier in the process and may need to be repeated prior to submission for Examination. Prudent budget management is taking place with the Local Development Plan Review budget to minimise any impact.
- (v) **Impact on Resources (human)** – There is a risk to the Council of the proposed NPPF changes if the new housing numbers go ahead. The 5-year supply of deliverable sites will drop to below 5-years and this will leave the Council open to speculative unplanned development. This will place an increased pressure on the professional resources within Development Management.

Background Papers: None.

Enquiries to: Anne Altoft-Shorland, Head of Planning Policy and Implementation.