



Planning Policy Consultation Team
Planning Directorate – Planning Policy Division
Ministry of Housing, Communities and Local Government
Floor 3, Fry Building
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Tuesday 24th September 2024

To Whom It May Concern:

**Re: Response from Greg Smith MP to HM Government open consultation on
proposed reforms to the National Planning Policy Framework
and other changes to the planning system**

The Mid Buckinghamshire constituency is heavily impacted by nationally significant infrastructure projects and any changes to the NPPF must reflect and respond to the multitude of ways in which both local communities and the local authority are affected. Any changes to the NPPF and wider planning system must have the consent of local authorities and local communities to prevent overdevelopment.

The risks of overdevelopment are difficult to overstate. In terms of housing, the impact both from construction and from future road users on local infrastructure must be fully accounted for, lest connectivity between existing communities be near permanently impeded. In terms of large-scale energy, transport and communications infrastructure, such development must not impact rural areas and only when projects can deliver material net benefits for the surrounding community can they be considered by the local authority.

Developers must also have sufficient resources to alleviate all types of impact on local parishes, neighbourhoods and communities, whether it be construction impact on surrounding areas; resourcing allocation by the local authority towards processing applications and managing the impact on highways from construction movements; or coordinating with other developers working in the same area to mitigate the impact on local roads and settlements.

Responses to Consultation:

Question 1 - *Do you agree that we should reverse the December 2023 changes made to paragraph 61?*

I completely disagree with plans for reversal of the changes that were only introduced.

I whole heartedly agree with the submission of Buckinghamshire Council in this regard. I have included their comments below:

No, the Council disagrees with this proposed change. The purpose of the changes made to paragraph 61 of the National Planning Policy Framework (NPPF) in December 2023 was to be clear that the need calculated by the standard method was an advisory starting point. This reflected two important facets of the standard method.



Firstly, that the housing need for an area can be different from the number of homes that an area plans for. For example, constraints such as National Landscape designations (previously known as Areas of Outstanding Natural Beauty), flooding or infrastructure limitations could mean it is inappropriate to plan for all of the housing need. This remains the case in, and the amended NPPF recognises this – paragraph 11 makes it clear that housing need should be met unless the protected areas or assets of particular importance provide a strong reason to restrict the overall scale, type or distribution of development; or the adverse impacts of doing so would significantly and demonstrably outweigh the benefits. Therefore, a new second sentence should be added to paragraph 61 stating “The outcome of the standard method is an advisory starting point for establishing a housing requirement for the area (see paragraph 11 above and 67 below)”.

Secondly, that a standard approach may not be appropriate in all instances. The current method utilises population projections and recognises that there are circumstances where these projections are not the most appropriate starting point for determining the level of housing need when planning for an area. This could be because the characteristics of the local population mean that the projections do not reflect likely population growth. For example, exceptional circumstances have been justified for authorities with a large student population (such as Cambridge) or where population projections have been shown to differ from observed reality – as measured by comparing the difference in population between Censuses and that calculated by projections (such as for the former Aylesbury Vale District). In these circumstances housing need which differed from those derived from ‘standard’ household projections have been accepted by Planning Inspectors as appropriate for the purposes of planning for an area.

The proposed new standard method utilises a housing stock-based approach rather than using projections, but exceptional circumstances to justify a different housing need may still exist. For example, authorities with a larger elderly population would generate less housing need due to the fact that population growth would be lower, or areas with poor economic prospects would generate less housing need due to the fact that more people would move to areas with better job prospects. The NPPF should not be a straight-jacket and should reflect that exceptional circumstances can exist and when they do authorities can take account of them. Robust evidence to justify any deviation should be tested at examination.

Question 7 - *Do you agree that all local planning authorities should be required to continually demonstrate 5 years of specific, deliverable sites for decision making purposes, regardless of plan status?*

I disagree with this proposed change. Housebuilding cycles vary significantly and are subject to local and national events.

Question 9 - *Do you agree that all local planning authorities should be required to add a 5% buffer to their 5-year housing land supply calculations?*

Absolutely disagree. The addition of a housing buffer will simply place further burden on the local authority to seek more sites and propose increased housing density. Sites that previously would have been previously rejected may have to considered to meet the buffer requirements. Sites that would have been previously disregarded due to concerns over flooding, transport, local setting and impact on local environment may be forced to be considered. Any increase in proposed numbers will result in further pressure to the greenbelt and existing settlements.

Question 14 - *Do you have any other suggestions relating to the proposals in this chapter?*

I have significant concerns about media speculation regarding proposals for the New Town Workforce. Large swaths of Mid Buckinghamshire could be considered for a new town. Any proposal may not be integrated into



the revised Local Plan impacting on planning for transport, education and health provision. The Government have failed to clarify if a new town being imposed on residents constitutes towards their (revised) housing targets. Buckinghamshire could be forced to build over 100,000 houses with a severe lack of cohesive planning. Furthermore, Buckinghamshire has already built a new town, now a City, in the form of Milton Keynes. It would be deeply inequitable for the county to be asked to build a second.

Question 15 - *Do you agree that Planning Practice Guidance should be amended to specify that the appropriate baseline for the standard method is housing stock rather than the latest household projections?*

I do not agree. Buckinghamshire Council was planning for approximately 61,152 over the lifetime of their new local plan. The revised methodology increases that to 86,562 resulting in an additional 24,410 properties. These proposals are not driven by local need but by a failure of London to meet their housing targets.

Question 20 - *Do you agree that we should make the proposed change set out in paragraph 124c, as a first step towards brownfield passports?*

I have always outlined that all development should favour brownfield sites. The proposed changes do not ensure that allocation of sites for housing and employment and decided at a local level. I continue to support brownfield building but want to ensure that employment land is available for growing businesses (on brownfield sites only).

Question 23 - *Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?*

I do not agree with the definition of grey belt. Green Belt in Buckinghamshire has been protected for nearly 70 years. Currently any proposed development under existing guidance has to be in exceptional circumstances. This Governments proposal is to normalise building in the Green Belt by a pseudo classification of grey belt land. The allocation of grey belt sites will be determined on a piece meal basis which could threaten vast swathes of Mid Buckinghamshire. I would recommend the entire removal of a grey belt definition - and instead replace it with cast iron protections against development for all Green Belt, all open countryside and all land used in food production.

Question 26 - *Do you have any views on whether our proposed guidance sets out appropriate considerations for determining whether land makes limited contribution to Green Belt purposes?*

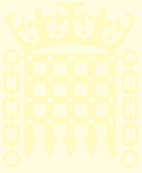
I strongly agree with the Buckinghamshire Council that the Governments proposed guidance is unclear.

The suggested definition set out in Chapter 5, Paragraph 10 and sub-sections is open to wider interpretations.

Parcels of land which are considered and assessed by the Local Planning Authority as Green Belt could be argued to be Green Belt Land.

Changing the definition of Green Belt to allow building on our countryside diminishes the important protection of agricultural land. The suggested definition only makes clear the intention of the Labour Government - that Green Belt will no longer be a barrier for future development.

Assessment to whether land makes a limited contribution to Green Belt purposes should be left to the Local Planning Authority without national interference.



Question 28 - *Do you agree that our proposals support the release of land in the right places, with previously developed and grey belt land identified first, while allowing local planning authorities to prioritise the most sustainable development locations?*

I strongly disagree that the proposals support the release of land in the right places. The government's own consultation paper (Chapter 5, paragraph 18) states that previously developed land and or 'grey belt' land might not be located in sustainable locations and so allows councils to release low performing Green Belt to meet development needs.

A council pursuing a sustainable development policy might logically exclude release of some previously developed land or 'grey belt' land which are not in sustainable locations. This would potentially leave unallocated 'grey belt' and previously developed land in unsustainable locations to the development management process of 'very special circumstances' and where only 'grey belt' proposals must be in sustainable locations (proposed NPPF paragraph 152).

Question 54 - *What measures should we consider to better support and increase rural affordable housing?*

To better support and increase rural affordable housing, it is essential that developments are designed to meet the actual needs of rural residents through comprehensive consultation with local communities. Engaging with residents from the outset will ensure that housing projects are tailored to reflect the unique characteristics and requirements of each area. These projects should prioritise local housing for local people, maintaining a balance that prevents overdevelopment while enhancing community cohesion. A critical improvement would be the publication of more detailed guidance on how to effectively assess rural affordable housing needs. Insufficient consultation often leads to opposition against rural housing schemes, with claims that housing needs assessments are inadequate. By establishing a standardised research methodology and ensuring robust community engagement, we can create a clear and consistent approach to determining housing needs. This will help mitigate objections based on insufficient research and foster developments that are truly beneficial to rural communities. In addition to this, in agreement with Buckinghamshire Council - there should be an amendment to Schedule 9 of the Localism Act 2011 to introduce an obligation for affordable housing targets to be included in Neighbourhood Plans. The approval of Neighbourhood Plans should be conditional upon the inclusion of affordable housing targets. Affordable housing needs must have been researched as part of the Neighbourhood Plan making process.

Question 63 - *Are there other sectors you think need particular support via these changes? What are they and why?*

I believe there is an opportunity to further support high value manufacturing and research and development, particularly at sites like the Westcott Venture Park. This facility is home to cutting-edge space technology and innovation, and the proposed changes could better support the expansion of such high tech sectors, supporting jobs and driving economic modernisation. Additionally, I would highlight the need for continued support for export-driven furniture production, a key industry in my constituency, to ensure its growth and maintain its competitiveness in both domestic and international markets.

I also believe that the proposed changes could better make more efficient use and involve the development of brownfield sites, particularly in and around our rural towns. However, it is essential that this is aligned with local economic strategies, and it ensures that any development supports sustainable growth and responds to the specific requirements of local economic need.



Question 69 - *Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?*

I support the proposed changes to paragraphs 114 and 115 of the existing NPPF, particularly the requirement for local authorities to adopt a vision-led approach to site assessments. This approach enables land use and transport planners to prioritise sustainable transport proposals effectively. However, I note that the draft NPPF (paragraph 111(a)) does not define what constitutes a “vision-led approach.” I suggest incorporating the definition from the TRICS Note on the Practical Implementation of the Decide and Provide Approach, which states that this approach aims to establish a development path best suited to achieving a desired vision of the future. This definition would highlight the importance of better coordination between transport and planning policies.

I have reservations about the proposed additional wording “in all tested scenarios,” as this could diminish obligations on developers and limit the scope for Highway Authorities to refuse applications. If proposals are acceptable in isolation but not cumulatively, this could undermine the requirements outlined in paragraph 113. The proposed change could weaken the Highway Authority’s position, making it challenging to secure the necessary infrastructure to mitigate a development’s impacts effectively. This situation could ultimately place additional financial burdens on councils, requiring them to seek funding for necessary works or grants, which would fall on the public purse rather than developers.

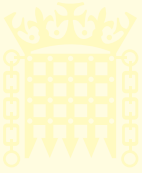
Additionally, it is vital that the vision-led approach is inclusive of local communities, ensuring that developments minimise damage to the landscape and align with the unique needs and values of those communities. Improved coordination among stakeholders will further enhance the effectiveness of these proposed changes, ensuring that they promote sustainable development while addressing local concerns.

Question 76 - *Do you agree that the threshold at which solar projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50MW to 150MW?*

All energy projects should be locally determined not dealt with nationally at arms length from the people they affect. The increase to 150MW is better than nothing, but still fundamentally flawed when it comes to the question of local consent.

Large-scale developments including rail infrastructure, energy infrastructure, large-scale housing developments and telecommunications infrastructure, all of which place a large burden on areas in which they are built, often without the consent or full knowledge of those living and working there. Some of the changes proposed in this consultation, such as Question 76 in relation to increasing the threshold for solar installations to be classed as “nationally significant”, would allow for further unscrupulous development without corresponding safeguards or additional resources for the local authority to process these NSIP applications - developers, seeing that the current Government favours the destruction brought by solar and battery storage facilities will game the system to ensure projects are over the threshold for NSIP somewhat may, expecting a more favourable answer.

Indeed, in Buckinghamshire we have already seen underhand gaming of the system by solar developers, whereby adjacent parcels of land are acquired by different developers as part of separate schemes but which in practice form part of the same overall project, the process for which does not allow for the same scrutiny as a single larger project would. This was the case, for example, with Callie’s Solar Farm and Kimblewick Solar Farm near Princes Risborough, which would sacrifice 88 hectares and 56 hectares for 49.9 megawatts and 40 megawatts respectively. Despite this being obvious both to the local authority and affected communities, such schemes are assessed individually; raising the aforementioned threshold would therefore risk exempting yet more unscrupulous and unwanted solar installations without the scrutiny that this level of development should warrant.



Question 78 - *In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?*

In line with the need to protect farmland from overdevelopment, rooftop solar installations should be widely and strongly encouraged as part of existing and future developments. According to analysis by CPRE, more than 50 per cent of national solar energy needs can be met by installing solar panels on the south-facing roofs of car parks, warehouses, public buildings and private properties. Several new large-scale housing developments in Buckinghamshire, for example, including in Berryfields in my constituency, do not include rooftop solar panels on the majority of new properties.

This is a missed opportunity given the reduction in cost for solar panels over the past decade. Data from the Department for Energy Security and Net Zero shows that costs per kWh for homes have reduced by 73 per cent since 2014. There is little use for rooftop space other than for solar energy, especially in the case of large warehouse roofs that have the potential generate just as if not more energy than ground-mounted solar developments. As such, a revised NPPF should encourage installation of solar panels as standard for new housing and warehouse developments and NOT on open countryside or agricultural land.

Question 83 - *Are there other ways in which we can ensure that development supports and does not compromise food production?*

The very changes proposed to the NPPF through this consultation I am afraid do the exact opposite - specifically by removing the provision that I secured as part of previous changes to the NPPF in the previous Parliament, as outlined below in Paragraph 182, Footnote 62:

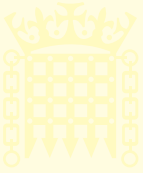
“Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development.”

It is nonsensical to remove this provision whilst seeking alternative means to protect food-producing land from unscrupulous development. The very addition of the above provision into the NPPF demonstrates that developers have historically not considered their projects to be a material risk to local or national food security, and it is reasonable to assume that with the limited time that has elapsed since the inclusion of this provision developers have not changed the delivery of their projects accordingly. As such, the most appropriate means to ensure future development does not compromise food production is to retain this provision in full.

Question 92 - *Are there any applications for which the current fee is inadequate? Please explain your reasons and provide evidence on what you consider the correct fee should be.*

Question 92 asks whether planning application fees paid to local authorities are inadequate, with questions 93-95 focusing on possible changes to account for a deficit in income from said fees. It is entirely the case that when faced with NSIP applications and associated development consent orders, local authorities must be adequately compensated for the large amount of resources allocated to process these, especially when there is little to no support for them locally.

Take for example HS2, which Buckinghamshire Council has over the past decade been forced to manage on a day-to-day basis in accordance with the associated Act of Parliament that underpins this project. Following my election as Member of Parliament for Buckingham in 2019 for the previous Parliament, Buckinghamshire Council has



allocated more and more resources in the form of time spent by officers managing the project's impact on the local highway network and natural environment, as well as having to fund new roles within the Council just to manage day-to-day problems directly caused by the project, such as highway congestion.

Likewise, even for projects where communities and the local authority have expressed support, such as East West Rail, there has not been sufficient resources to manage the project's impact especially in a rural county such as Buckinghamshire, which has included compensation requests from local businesses affected by regular road closure associated with the project. Large-scale infrastructure developments that require a DCO and are underpinned by primary legislation, which in EWR's case is a Transport and Works Act (1992) order, should be subject to planning application fees just as smaller-scale developments are, given their large-scale community impact.

Summary

In conclusion, I believe planning should rest with local communities, free from central Government targets and interference. Our countryside should be protected from development with food security given absolute protection. The place for development is on brownfield sites and brownfield sites alone. My constituents have suffered enough from loss of our countryside, Green Belt, agricultural land, nature reserves and more. In particular, with significant proportions of my constituency covered by the Chilterns, it is extremely important full and total protections remain for Areas of Outstanding Natural Beauty.

On behalf of my constituents, I urge the reforms of the NPPF to be dropped and instead planning policies that in fact protect our countryside put in place.

Yours sincerely,

A handwritten signature in blue ink that reads "Greg Smith".

Greg Smith MP
Member of Parliament for Mid Buckinghamshire