



PLUMPTON PARISH COUNCIL - Consultation Response

Plumpton Parish Council would like to make it perfectly clear that it accepts the need for additional housing, especially social and affordable housing. Our Neighbourhood Plan exceeded the objectively assessed allocation made by the LPA, Lewes District Council, but due to previous changes to the NPPF both the Local and Neighbourhood Plans were rendered 'out of date' despite being less than 5 years old. The result is a constant stream of unwanted and unneeded developments across the rural communities of the Low Weald.

It is our considered opinion that the proposed changes to the National Planning Policy Framework (NPPF) will:

- Fail to address the deficit in social housing building programs that has arisen from decades of under investment and reliance on the free market
- Fail to create truly affordable housing for those that do not qualify for social housing but do not earn enough to command a suitable mortgage, as the model of free market development has failed to do that to date
- Result in an unacceptable loss of countryside by skewing development away from high density urban population centres to the countryside where developers make greater profit

While we agree on the urgent need for more housing and a rapid clean energy rollout to combat climate change, we also need to preserve our most valuable green spaces for generations to come and to ensure that food security is given crucial consideration.

The December 2023 changes to the NPPF started to reduce developer influence, but the recent proposals have once more reverted to a developer-centric approach. These proposals prioritise market housing over affordable options and frequently lead to unsustainable development locations. The emphasis on targets and the presumption in favour of development encourage projects that fall outside local plans, while viability opt-out clauses allow housebuilders to sidestep their obligations.

Top-down targets misunderstand the core issue. It's housebuilders, not councils, who construct homes, and they prioritise profit margins over volume. The current strategy, which relies on the market, is flawed and makes policies undeliverable. It's vital that the NPPF presents a positive vision for rural areas, supporting their renewal rather than serving profit-driven developers, instead creating a planning system that supports our people and protects the countryside for future generations.

To move beyond simply changes to the NPPF, the government should undergo a radical revision to ensure we:

1. Plan nationally for national infrastructure
2. Ensure evidence-based planning
3. Prioritise truly affordable housing
4. Enforce 'brownfield' first
5. Prioritise food security and the environment
6. Safeguard landscapes whilst rapidly transitioning to renewables
7. Promote nature recovery and strategic land use



1. Plan nationally for national infrastructure

National issues require a national focus. LPAs are often left in long and expensive planning battles because the definition of NSIP is not strong enough. Local planning officers are often unqualified to determine large developments, and taxpayers pick up the resultant cost of endless delays and challenges, however well motivated.

Regional strategic plans should take the national plan and guide its implementation within individual LPAs.

2. Ensure evidence-based planning

We need a planning system grounded in evidence, including social housing targets and local input. A 'one size fits all' centrally mandated solution is not fit for purpose.

Policies should be tested for their impact on developers and their delivery, and assessed for their effects on ecology, natural capital, food security, carbon emissions, soil, water and air quality.

There must be accountability for developers to actually build out the ~1 million unbuilt permissions.

The standard method is hugely flawed and should be replaced with a return to objectively based needs analysis. Universal home ownership should not drive targeting.

LPAs should be mandated to reduce local social housing lists to as close to zero as possible.

3. Prioritise truly affordable housing

Affordable homes are essential for healthy living, but we face a crisis of homelessness, and long waiting lists for social housing stretching to 1 million across the country. We need more homes, but most importantly, they must be affordable.

- Redefine 'affordable' housing based on local incomes, not 80% of market rates, which remains too high for many.
- Ensure housing numbers are calculated using accurate assessments of local needs.
- Set ambitious goals for affordable homes, including social housing.

4. Enforce 'Brownfield-First'

Research shows that there is enough brownfield land for 1.2 million homes. The NPPF should:

- Mandate local plans to set targets for homes on brownfield sites.
- Push the government and Homes England to prioritise brownfield over greenfield.
- Allocate more funds to local planning teams to maintain updated Brownfield Registers.



5. Prioritising Food Security and the Environment,

The Green Belt provides space for nature, food, and tranquillity but is under pressure from development. Once it's gone, it's gone. Rather than introducing a confusing 'grey belt,' we need a clear hierarchy that prioritises the use of empty homes and conversions, followed by suitable brownfield sites, and finally compact, transit-oriented greenfield developments. Low-density, car-dependent projects should be rejected in favour of sustainable, compact developments.

- The planning system must protect prime farmland and natural ecosystems.
- Permit building on brownfield within the Green Belt without introducing complex 'grey belt' categories.
- Maintain the rule that Green Belt boundary changes are scrupulously 'exceptional.'
- Exceptional Green Belt development is properly calculated and near transport hubs.

6. Safeguard landscapes whilst rapidly transitioning to renewables

To combat climate change, we must accelerate clean energy adoption. Rooftop solar offers a sustainable solution, potentially meeting 60% of solar targets while preserving the countryside. The NPPF should:

- Adopt an 'offshore only' policy for large scale windfarms, which would also have the benefit of creating infrastructure for re-use in tidal renewables schemes, hastening their viability.
- Prioritise rooftop solar in local energy strategies. - Solar energy, batteries, and grid infrastructure should be installed on brownfield sites, rooftops, and car parks. Environmental considerations must be on par with economic growth.
- Require local authorities to assess rooftop solar potential in their areas.
- Set strong guidelines for decommissioning solar farms, returning land to its original use.

7. Promote Nature Recovery and Strategic Land Use

Our countryside faces increasing demands and is among the most nature-depleted in the world. The NPPF should:

- Strengthen protections for land designated by Local Nature Recovery Strategies.
- Protect top-quality farmland, reinstating policies that prevent development on grade 1 agricultural land.
- Implement further recommendations on nature recovery from the Wildlife and Countryside Link.
- Introduce severe penalties for landowner and developer abuse of the system, especially removal of mature trees due to 'risk', even when TPOs are in place, and the deliberate under management of land and/or removal of ecological assets (such as clearing hedgerows) to reduce the cost of meeting biodiversity net gain responsibilities.

N P Beaumont

Chair, Plumpton Parish Council

24th September 2024