

Understanding the revised National Planning Policy Framework (2024)

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Introduction

On the 12 December 2024 the Government released their revised version of the [National Planning Policy Framework](#) (NPPF). This version replaced the [December 2023 Framework](#), released by the previous Government.

The NPPF sets out the Government’s planning policies for England and provides guidance on how these policies should be applied. The Mayor’s [London Plan](#) is required to be consistent with the NPPF. Local and neighbourhood plans are also required to be consistent with the NPPF.

This post by **William Weihermüller** of the Research Unit sets out four changes that may be of note to Londoners.

Grey Belt

The revised NPPF includes a new designation for some sections of land currently designated as Green Belt, the Grey Belt. This is defined in the NPPF as;

“land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143 [see below]. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 [see below] (other than Green Belt) would provide a strong reason for refusing or restricting development.”

Examples of land that is likely to earn Grey Belt designation include quarries, car parks, golf courses, glasshouses, solar parks, caravan parks, camp sites and other leisure facilities. [1] This may be particularly relevant for London, as around 47.7 per cent of Green Belt land within London is categorised as developed. [2] This includes 1,549 hectares for transport and utilities, 1,098 hectares of land for community use, 148 hectares of residential land, and 27 hectares of landfill and mining.

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Some of the land excluded from the Grey Belt, as established in footnote 7 of the NPPF, include Sites of Special Scientific Interest, Local Green Space, National Parks and heritage assets. Areas that are at risk of flooding or coastal change are also excluded from the Grey Belt.

Further guidance on identifying Grey Belt land is expected to be published in January 2025. [3]

The Green Belt

The definition of Grey Belt land refers to land which does not “strongly contribute” to three of the five purposes of the Green Belt (referred to as paragraph 143 in the above definition). These purposes include:

- to check the unrestricted sprawl of large built-up areas,
- to prevent neighbouring towns merging into one another,
- to preserve the setting and special character of historic towns.

Two other Green Belt purposes, namely, to assist in safeguarding the countryside from encroachment, and to assist in urban regeneration, are not included as considerations.

The previous version of the NPPF included exceptions where development on Green Belt land was allowed. These exceptions included, but were not limited to, buildings for agricultural or forestry purposes, limited affordable housing for local needs, and the limited infilling of villages. The revised NPPF includes these exceptions, and adds guidance on where building homes, or other developments could be considered appropriate. The guidance includes four criteria:

1. The development would utilise Grey Belt land and not fundamentally undermine the purpose of the remaining Green Belt in the area;
2. There is demonstrable unmet need for the type of development proposed;
3. The development would be in a sustainable location;

4. Where their development meets the ‘Golden Rules’ (see below).

All four of these criteria would need to be met for development to be considered appropriate.

‘Golden Rules’

The revised NPPF also included a set of ‘Golden Rules’ which serve as guidelines on contributions that should be made when developing housing on land which has been released from the Green Belt. The three contributions are:

1. Affordable housing which reflects either: (i) development plan policies produced in accordance with paragraphs 67-68 of the Framework [4]; or (ii) until such policies are in place, the policy set out in paragraph 157 [5]
2. Necessary improvements to local or national infrastructure; and
3. The provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.

Developments which comply with the Golden Rules are to be given “significant weight in favour” of being granted permission.

Standard Method

Finally, the revised NPPF includes changes to the Standard Method. The Standard Method is a formula used by local authorities to establish minimum housing need. The previous Method, published in 2019, used a four-step approach. In July 2024, housing need identified using the then Standard Method was 305.7k net additional homes per annum. 99k of those homes were needed in London. [6]

The revised Method now uses a two-step approach to calculate housing need:

1. Setting a baseline using 0.8% of existing housing stock for the area.
2. Adjusting to take account of affordability. The baseline figure is then adjusted using an adjustment factor calculated using the five-year average affordability ratio.

Using the revised Method, London has a need of 87,992 net additional homes per annum. This is less than the 99,822 calculated using the previous Method, but higher than the current London Plan target of 52,000. [7]

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It is worth noting that the Standard Method is the mandatory means by which a local authority establishes housing need, it does not set binding housing targets. [8]

What does this mean for the next London Plan?

The Mayor's London plan is currently undergoing a review, with the aim of adopting an updated version in 2027. These revisions to the NPPF will impact the next London Plan, especially in terms of Green Belt protections and housebuilding targets.

For further information on the London Plan, please the Research Unit has produced a [background paper](#) explaining its purpose, current content and the process for amending or replacing it.

Notes

[1] Savills, [In Plain English: The grey belt](#) (2024)

[2] Department for Levelling Up, Housing and Communities, [Land use in England 2022, Table 401a](#) (2022)

[3] Inside Housing, [5 things we learned from Labour's finalised NPPF](#) (2024)

[4] These paragraphs dictate that a specific affordable housing requirement should be set for major developments on land release from the Green Belt, or within the Green Belt. This requirement should be at a higher level than would apply on other land and be a minimum of 50% of the housing provided, unless this would make the site unviable.

[5] Paragraph 157 of the revised NPPF states that, until a policy is produced in line with paragraphs 67-68 of the Framework, the affordable housing contribution required is 15 percent above the highest existing requirement which would otherwise apply. Where there is no existing requirement, a 50 percent contribution should be applied.

[6] Lichfields, [A new Standard Method: Stocking up?](#) (2024)

[7] Lichfields, [A\(nother\) new Standard Method: Back in Stock](#) (2024)

[8] Lichfields, [A new Standard Method: Stocking up?](#) (2024)

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