

Planning Policy Consultation Team
Planning Directorate – Planning Policy Division
Ministry of Housing, Communities and Local Government
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Via email: PlanningPolicyConsultation@communities.gov.uk

20 September 2024

Dear Planning Policy Consultation Team

The Countryside Alliance works for everyone who loves the countryside and the rural way of life. Our aim is to protect and promote life in the countryside and to help it thrive. With over 100,000 members and supporters we are the only rural organisation working across such a broad range of issues.

The Countryside Alliance welcomes this opportunity to respond to the proposed reforms to the National Planning Policy Framework and other changes to the planning system. The consultation presents several significant proposals and changes within the Framework that have the potential to impact both housing availability and the environment.

One of the key proposals is to increase housebuilding targets, moving from 300,000 homes per year to 370,000, with a goal of delivering 1.5 million homes over the next five years. This includes a mandate for local authorities to utilise low-quality green belt land, which will be reclassified as 'grey belt'. The Alliance acknowledges the need to address the national housing shortage, and we recognise that the countryside must play a role in delivering this. However, it is imperative that these new homes are affordable for the communities they serve, and that brownfield sites and reclassified grey belt land are prioritised over high-value greenfield areas.

We welcome the government's intention to reclassify parts of the green belt as grey belt, particularly where the land in question does not meet the traditional expectations of green belt land, such as preventing urban sprawl or serving as a vital natural habitat. It is important, however, that any changes maintain protection for areas that are genuinely serving their intended purpose. The government's definition of grey belt—which includes land on the edges of settlements, alongside roads, and sites such as old petrol stations and car parks—is a positive step. However, we urge that individual councils carefully review these designations to protect land that remains important for stopping urban sprawl and maintaining green spaces near urban areas.

In addition to housing, the NPPF also includes plans to accelerate the delivery of renewable energy, particularly solar power. This is a vital step towards meeting the UK's net-zero targets, reducing greenhouse gas emissions, and helping to lower energy bills. While we fully support the drive towards clean energy, we believe that the consultation has overlooked a crucial component: a rooftop-first policy for solar energy installations. The Alliance

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advocates for solar panels to be installed on rooftops of new builds, commercial structures, and car parks before considering the use of farmland or greenfield sites.

Rooftops across the country have untapped potential for solar power, and it is crucial that we utilise this before looking to our green spaces. By prioritising rooftop solar, we can spare valuable land for food production and wildlife, while making efficient use of the space we already have. Research from CPRE indicates that 60% of the UK's solar energy needs can be met through rooftop installations, reducing the need to sacrifice productive farmland.

Key points from the Countryside Alliance on the National Planning Policy Framework

- The Alliance acknowledges the need to address the national housing shortage, and we recognise that the countryside must play a role in delivering this.
- It is imperative that any new homes are affordable for the communities they serve and that brownfield sites and reclassified grey belt land are prioritised over high-value greenfield areas.
- We welcome the government's intention to reclassify parts of the green belt as grey belt, particularly where the land in question does not meet the traditional expectations of green belt land, however, any changes maintain protection for areas that genuinely serve their intended purpose.
- The Alliance advocates for solar panels to be installed on rooftops of new builds, commercial structures, and car parks before considering the use of farmland or greenfield sites.

The Alliance will continue to advocate for a balanced approach to the proposals within the NPPF but urge the government to ensure that housing is delivered in a way that protects the environment, prioritises brownfield and grey belt land, and supports sustainable energy solutions such as rooftop solar. Time is running out to take meaningful action on the climate emergency, and we must make the most of our finite resources to build a future that works for both people and the planet.

The Countryside Alliance has only responded in a general capacity to this consultation as we are not experts in planning policy so we, therefore, feel it would be inappropriate for us to comment on those more technical aspects in detail. If the Countryside Alliance can be of further assistance or you require any clarification of the points raised, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'T.P.C.' followed by a stylized flourish.

Tim Bonner
Chief Executive