

# Planning Committee

9 October 2026

Agenda item number 10

## National Planning Policy Framework – 2026 version

Report by Planning Policy Officer

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### Summary

A new National Planning Policy Framework (NPPF) was published 17 August. This new version is now a material consideration in determining planning applications. It is also of relevance to parts of the Authority's emerging Local Plan. This report provides a briefing to Members on the changes to national policy.

### Recommendation

It is recommended that Members note the report.

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## 1. Introduction

- 1.1. This report provides an overview of the revised NPPF.
- 1.2. The new NPPF came into force from the day it was published. With all the changes that are now in place, it will take some time for all involved in the planning system to digest the full detail of the new NPPF provisions and consider their implications.

- 1.3. The new NPPF is here: [National Planning Policy Framework.pdf](#). The Government response to the NPPF consultation is here: [National Planning Policy Framework consultation - government response](#).
- 1.4. The 2024 NPPF is referred to in this report and, noting that it is not in place anymore, it is archived and accessed here in case Members wish to cross refer: [archived pdf version - December 2024](#).

## 2. Background

- 2.1. The NPPF is a key national policy document governing plan making (e.g. preparation of local plans) and decision making (e.g. determination of planning applications). First published in 2012, the NPPF has been updated a number of times to varying degrees between 2018 and 2026. This latest NPPF is a significant re-write.
- 2.2. Consultation on the proposed NPPF took place between December 2025 and March 2026. A briefing note and proposed response relating to that consultation came before Planning Committee in February 2026: [National Planning Policy Framework consultation and changes to Biodiversity Net Gain](#).

## 3. About the new NPPF 2026

- 3.1. The NPPF is deliberately encouraging growth. It has not changed much since the March draft.
- 3.2. The NPPF now comprises national plan-making policies and national decision-making policies. This brings the structure of the NPPF into closer alignment with local plans and neighbourhood plans which are principally structured around planning policies.
- 3.3. Despite the new national **decision-making policies** being non-statutory they remain critically important to the decision-making process. Annex A of the NPPF notes that any development plan policies that are materially inconsistent with national-decision making policies 'should be given very limited weight'. Officers are reviewing existing local plan policies against the new national decision-making policies to identify areas of inconsistency.
- 3.4. **Plan-making policies** apply to the preparation of development plans, including spatial development strategies (SDS), local plans, minerals and waste local plans, neighbourhood plans, and supplementary plans.
- 3.5. While the statutory 'duty to co-operate' has been abolished, the importance of maintaining and demonstrating effective cooperation between plan-making authorities and key stakeholders is retained in the NPPF to ensure strategic cross boundary matters are identified and appropriately addressed through the preparation of plans.
- 3.6. Spatial development strategies (SDSs) are development plans that address planning matters of strategic importance over a sub-regional area and will be prepared by strategic planning authorities (i.e. the future Norfolk and Suffolk Combined County Authority). The

NPPF plan-making policies address SDSs, including – that they set out a positive vision for growth and change at the sub-regional scale providing a clear framework for investment and growth; focus on strategic matters, leaving other parts of the development plan to address more detailed matters; identify broad locations for a sustainable pattern of growth covering at least 25 years; set out the type, extent and broad location of strategic infrastructure needed to enable development and support existing communities; and that SDS preparation must commence no later than 7 years after the adoption of the previous SDS.

- 3.7. Procedural plan-making policies also address supplementary plans, which are expected to be targeted at specific issues not addressed by other parts of the development plan. Supplementary plans should be limited to setting out locally specific design standards, or situations where a positive response to unanticipated changes in the local area would quickly put in place policies to shape or direct development of a site or a group of nearby sites

## 4. 92 things you need to know about the final version of the new NPPF

- 4.1. This assessment is taken from this Planning Resource Article from 20 August 2026: [92 things you need to know about the final version of the new NPPF | Planning Resource](#).

### General principles

**1. The [new NPPF](#) contains both revised plan-making policies and decision-making policies in one document.** As trailed in the consultation draft document in 2025, the new framework has a radical new structure compared to previous versions. In its consultation response document, the government says the proposed format and structure are “integral to establishing a comprehensive set of national policies on general planning matters, and to making policy more rules-based and certain”.

**2. The policies are non-statutory – for now.** The government says it has considered the arguments for and against statutory national development management policies (NDMPs), and the matter will be kept under review. “Should a decision be taken to progress statutory NDMPs, the government will ensure that their scope is clearly defined, supported by guidance and transitional arrangements, and that their role in relation to development plans is set out clearly to provide certainty for decision-makers and communities,” the consultation response document states.

**3. According to plan-making policy PM6 on general principles, plans should not “duplicate” nor “substantively restate” what is contained in the NPPF’s decision-making policies – but the government has deleted the draft’s instruction that they should not “modify” such policies.** The government says it recognises concerns that seeking to prevent the modification of decision-making policies “could impose an inappropriate degree of rigidity”. Instead, the instruction is that plans should not include policies that are “inconsistent” with national policies.

**4. The transitional arrangements for the new NPPF have been softened from those outlined in the draft.** The implementation section of the framework says policies, or parts of policies, that are “materially inconsistent” with the policies in the new document should be given very limited weight. The draft had proposed that as soon as the document is live, local development plan policies that are “in any way inconsistent with the national decision-making policies” outlined in the NPPF should be given “very limited weight” in decision-making. The change was made in response to concerns that the policy as drafted was “too hard-edged and could apply too broadly”, according to the consultation response document.

**5. Plans being prepared today under the existing plan-making system can continue to be judged against the 2024 version of the NPPF,** subject to the transitional arrangements set out in the 2024 document. However, any plans being brought forward under the new system as introduced by the 2023 Levelling Up and Regeneration Act should use this new framework.

**6. The updated NPPF includes a series of new annexes holding key technical reference information, including the methodologies by which to calculate housing need and the housing delivery test, and to conduct green belt reviews.** However, the government has decided not to take forward a technical annex to include standardised inputs in viability assessment. “While we understand the need for a consistent framework for evaluating development proposals and certainty in the viability assessment process, we consider that further engagement is needed with local planning authorities (LPAs), developers, development surveyors and other key stakeholders,” it says in the consultation response document.

**7. As outlined in the draft document, the new NPPF includes some decision-making policies that indicate how much weight the government would expect a particular consideration to be given.** These include cases where, it says, it is appropriate to give substantial weight to certain benefits, and the limited circumstances in which it is expected that permission would be refused. The government says this standardised approach will provide greater clarity, while the weight to be given to specific considerations “remains a matter for decision-makers, to be determined on the facts of individual cases”.

#### **Achieving sustainable development**

**8. Policy S1 says development plans should seek to meet the development needs of their area as a minimum.** Plans should provide for new development and improvements of the environment in a way that promotes a sustainable pattern of growth and seeks to mitigate climate change and adapt to its effects, the policy maintains.

**9. Policy S3 takes forward the long-established “presumption in favour of sustainable development” for decision-making.** It retains the existing principle that proposals which accord with the various development plans should be approved without delay.

**10. Policy S4 says development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects,** including impacts in relation to other policies in the framework. This might be where the proposal would have a “substantial adverse impact” in relation to the allocation or safeguarding of land

for particular uses in the development plan, or to the application of the certain policies in the framework, the draft adds.

**11. Policy S5 proposes a new ‘tilted balance’ to assessing development proposals outside settlements, including modifying the definition of “well-connected” rail stations to include the top 80 travel-to-work areas** – the draft suggested the top 60. The document adds that only certain forms of development should be approved outside settlements. These include:

- Rural businesses and services that need to be located outside settlements.
- Development “within reasonable walking distance of a well-connected station”.
- Development that would address “an evidenced unmet need” (including where the council cannot demonstrate a five-year housing land supply) and where development would be “physically well related” to an existing settlement or would comprise major development for freight and logistics purposes.

These developments should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, the document states.

**12. Policies S4 and S5 state that the benefits of development are likely to be outweighed by harm in situations where proposals “fail to comply with one of the national decision-making policies which state that development proposals should be refused in specific circumstances”.** The previous presumption in the 2024 NPPF explicitly listed a series of policies that should be considered in concluding whether a proposal’s benefits were likely to be outweighed by its adverse impacts – including those in relation to sustainable locations, design quality and making the most effective use of land.

### **Strategic planning: Spatial development strategies**

**13. Policy PM1 introduces the new system of strategic planning.** The NPPF says spatial development strategies (SDSs) are required to be produced by strategic planning authorities and the mayor of London. They should set a positive vision for future growth and change at a subregional scale, and should be “genuinely strategic in nature”, allowing for more detailed issues to be considered through other parts of the development plan.

**14. SDSs should set out a strategy for a sustainable pattern of growth covering a period of at least 25 years – up from the 20-year period stated in the draft.** The minimum period has been adjusted upwards “to support long-term certainty for planning, infrastructure delivery and investment”, the consultation response document states. SDSs should include an apportionment to those LPAs within its area of objectively assessed needs for housing and other uses, the new NPPF says.

**15. Strategic planning authorities should commence preparation of a replacement or altered SDS no later than seven years after the current version is adopted, or earlier where there have been significant changes.** This is an adjusted period from the draft, which had instructed that a replacement should be adopted no later than ten years after the current version was adopted, or earlier if there had been significant changes. “This approach maintains up-to-date

plans by ensuring that no SDS should be more than approximately ten years old, while supporting stability and reducing unnecessary burden,” according to the government.

**16. Only housing requirement figures from SDSs that are under five years old can be used in the housing delivery test or five-year housing land supply calculations.** The government says it has decided to maintain the current approach because it considers that a five-year period “strikes an appropriate balance between providing stability for plan-making while ensuring that the housing requirement figures used for calculations remain responsive and reflect local need”.

**17. Tests of soundness are applied to the examination of SDSs.** The tests applied to such documents are “positive”, “appropriate”, “effective” and “consistent with national policy”, as set out in policy PM14. The positive test states that a strategy that does not provide for objectively assessed needs “should be considered an exception”.

### **Local planning**

**18. Local plans should cover a minimum ten-year period, down from the current 15 years, which was also proposed in the draft document.** This is despite 69 per cent of respondents supporting the retention of the 15-year minimum plan period. The government says it “notes the overall support for longer plan periods”. However, it notes comments suggesting shorter periods would have benefits of flexibility and adaptability, evidence being more relevant and up to date, and reduced resource burdens on local authorities. “For these reasons we consider that plan periods should allow for both long-term planning and local flexibility to be able to be responsive to local circumstances,” it explains. The document makes it clear that longer time periods continue to be appropriate “where this supports, for example, the delivery of strategic development and infrastructure”.

**19. Local plans should be prepared and adopted within 30 months of publishing a “Gateway 1” self-assessment.** Authorities must start on the preparation of the next local plan no later than five years after adoption of the current plan. But the government says this should be earlier where an inspector at examination of the current plan has made a recommendation to do so or where there has been a significant change in local circumstances (including an increased housing requirement). The government acknowledges concerns about the 30-month local plan preparation timeframe. However, its position “remains that this strikes the right balance between speed and deliverability”, the consultation response document says. The wider package of plan-making reforms, it adds, “will support authorities in meeting these timescales”.

**20. Statements of common ground should be used to demonstrate that relevant cross-boundary matters have been addressed,** including by distributing and providing for unmet needs across neighbouring and/or nearby areas. Where it has not been possible to fully address cross-boundary matters, plan-making authorities should demonstrate that they have taken all reasonable steps to address them.

**21. The soundness tests for local plans remain, and the draft NPPF’s proposal to introduce a “realistic” test in the draft has been withdrawn in favour of retaining the current “effective”**

**test.** As trailed in the draft, a new test stating that the plan should be in general conformity with any adopted SDS for the area is introduced.

**22. Local plans should identify “appropriate sites” for development, the NPPF says in a revision to the draft’s text, which said authorities should identify “the most appropriate sites” for development.** The government says the tweak was made “to respond to concerns this would place significant burdens on plan-makers and would be inconsistent with the tests of soundness”.

**23. The government has opted not to bar local authorities from setting energy-efficiency standards for new housing that exceed national building regulations.** Instead, a new paragraph in policy PM13 outlines the circumstances in which LPAs can set out local energy-efficiency standards. The response document says the government has backed down on this issue following concerns that the draft’s approach “could hinder local authorities’ ability to address climate change in their areas”. The government also says it will not commence section 43 of the Deregulation Act 2015, which would have legally barred LPAs from setting higher energy-efficiency standards than Building Regulations.

**24. The use of supplementary plans should be limited to setting locally specific design standards and responding to changes in the area, the NPPF says.** In the latter case, this should be where it is important to put in place policies “for a site or group of sites which the authority considers to be nearby to each other”.

#### **Decision-making policies**

**25. The new NPPF says proposals for major development should be informed by early engagement with stakeholders to identify and seek to resolve key planning matters prior to the submission of a planning application.** It states that such proposals should be accompanied by a “concise” planning statement. Proposals for other types of development should be supported by the minimum necessary information requirements to enable a decision, it adds.

**26. Policy DM5 on development viability sets out a range of scenarios where viability tests might be appropriate to reduce planning contributions from a site to levels below that expected in local policy.** The policy says viability tests are reasonable where:

- The development proposed is different from that envisaged during the local plan examination.
- The site characteristics “differ substantially” from those assumed during the plan process.
- The site is burdened by unforeseeable costs.
- Economic circumstances have changed significantly.

**27. Policy DM6 on planning conditions and obligations makes clear that “model” planning conditions “should be used unless there are strong reasons for using a different**

**condition”**. Conditions requiring discharge prior to development commencing “should be avoided unless there is a clear justification”, it proposes.

**28. Local authorities and mayoral authorities are “strongly encouraged” to make use of local development orders (LDOs) to provide certainty to applicants about the prospects of permission, policy DM9 states.** The current framework does not extend to mayoral authorities – authorities are merely “encouraged” to use LDOs.

**29. The NPPF endorses the use of Article 4 Directions to remove permitted development rights where it is necessary to protect local amenity or the well being of the area**, such as supporting the vitality and viability of parts of town centres. It drops the instruction of the previous NPPF that where such directions relate to changes from non-residential to residential use, they should be limited to situations where they are “necessary to avoid wholly unacceptable adverse impacts”.

#### **Urban and suburban densification**

**30. Decision-making policy L2 on making effective use of land calls for “substantial weight” to be given to various types of proposals that reuse existing sites.** It specifically encourages schemes that:

- Remediate land.
- Make better use of under-utilised land.
- Provide temporary uses.
- Make use of airspace above existing development.
- Provide “sensitive redevelopment or additional development within existing plots”, including (but not limited to) mansard roof extensions.

**31. While opening up the possibility of “additional development within existing plots”, policy L2 also places limits on the scale of redevelopment within “residential curtilages”.** It says schemes should “not occupy more than twice the footprint of all the existing buildings on the site and, following development, would retain at least 50 per cent of the non-developed area within the building curtilage”.

**32. Residential or mixed-use developments within settlements should increase the density in the area where they are proposed, according to decision-making policy L3.** New text added since the draft clarifies that the only exception to this should be “where there is a clear justification that this is either inappropriate or not possible”. The policy says that while an area’s character should be taken into account in decisions, this “should not preclude development which makes the most of an area's potential”.

**33. A policy in the draft proposing that plots around all train stations should be built out at a density of at least 40 dwellings per hectare (dph) has been scrapped.** Draft policy L3 had also proposed that plots around “well-connected” stations should be built out at 50dph, but the final version has lowered this to at least 35dph, with a higher threshold of at least 45dph

reserved strictly for high-frequency transit nodes. In its consultation response document, the government says some respondents argued that the density targets could “create viability and market demand challenges in some locations”, while others claimed that imposing minimum density standards around stations with irregular or infrequent services “could lead to inappropriate development and undermine wider efforts to support sustainable patterns of growth”. The removal of density requirements around stations with lower service levels, it adds, will “support a more gradated approach to density”. The new density requirements “enable a more responsive approach, reflecting that high-frequency stations are usually in major urban areas and town centres, and can therefore support higher densities”.

### **Design and healthy communities**

**34. The instruction in the draft framework and previous NPPF to refuse development proposals that are not well designed has been dropped.** Policy DP3 of the final document says instead that proposals should be refused if, without clear justification, they conflict with key elements of the design policy, or with any explicit design standards set out in the development plan. Substantial weight should be given to compliance with relevant development plan policies when assessing the design quality of proposals, it adds.

**35. The design policy includes a specific reference to women and girls in its instructions for designing public spaces.** The government says the addition was made in response to calls for “explicit recognition of the safety of women and girls in public spaces”.

**36. LPAs should encourage the appropriate use of design reviews and take into account their outcomes, including any design recommendations made by review panels, the framework specifies.** It adds that councils should not allow the quality of approved development to be materially diminished between permission and completion.

**37. The final NPPF confirms the draft’s move to direct authorities to refuse hot-food takeaways within walking distance of schools, albeit omitting the term “fast-food outlets”.** Policy HC5 of the document says such proposals should be refused near places where young people congregate and in locations where there is evidence that a concentration of such uses is having an adverse impact on local health, pollution or antisocial behaviour.

### **Natural environment**

**38. The government has backtracked on a more permissive approach it took in the draft to development in protected landscapes (defined as national parks and national landscapes),** reinserting the instruction that proposals for major development in such areas should be “refused” other than in exceptional circumstances. The draft had said such proposals “should only be supported” in exceptional circumstances. The final version also clarifies that the public interest test should be separate, whereas the draft version had implied that it was part of the same test. The changes were made following concern in the consultation that protections had been weakened through changes to the wording.

**39. However, the instruction that “substantial” weight should be given to the importance of conserving and enhancing the natural beauty of these areas, replacing the “great weight”**

**that the previous NPPF said should be given, is retained.** The government states that the change is “not intended nor considered to diminish the actual weight which would be given to the importance of these areas in policy terms”.

**40. Decision-takers should consider landscape character and “existing natural features” when looking at the impact of development proposals.** Under decision-making policy N2, development proposals should consider these factors and minimise biodiversity impact that, where it cannot be avoided nor mitigated, should result in permission being refused. The previous version of the NPPF had instructed planning policies and decisions to protect and enhance “valued landscapes”.

**41. The new document instructs proposals to take into account the quality of agricultural land.** If “significant development of agricultural land is necessary”, it adds, schemes should “use areas of poorer-quality land where possible”.

**42. Local authorities should not attempt to levy higher biodiversity net gain requirements than the statutory level,** except on specific site allocations where fully justified and deliverable. The stipulation comes in draft plan-making policy N1 on identifying environmental opportunities and safeguards.

#### **Green belt**

**43. Housing and mixed-use development around stations defined as “well-connected” will not be considered inappropriate, provided it is of an appropriate scale, does not prejudice long-term development proposals and complies with the NPPF’s “golden rules”.** The government says the objective of this policy is to support high-density development in sustainable locations. The golden rules were [introduced in the December 2024 NPPF](#) and apply to all residential development on green belt, requiring higher levels of affordable housing, among other things (see points 49 and 50).

**44. Policy GB2 says the preparation of SDSs should be informed by an assessment of the strategic role of green belt land in the area.** The assessment should take into account the five purposes of the green belt, it adds. The strategic assessment should be used to help develop the SDS and identify whether there are areas where green belt boundaries may require further consideration through the preparation of local plans. The preparation of local plans should be informed by an assessment that identifies green belt land, the policy notes.

**45. “Exceptional circumstances” are still required for altering green belt boundaries in local plans, according to policy GB3 of the document.** These include an LPA being unable to meet its identified need for development in full, having examined all other reasonable options for doing so, it adds.

**46. However, where a development plan’s spatial strategy has identified suitable land around well-connected stations for development, exceptional circumstances do not need to be demonstrated to justify altering green belt boundaries.**

**47. The NPPF drops an instruction in the draft version for development plans to set out ways that the impact of green belt releases could be offset through compensatory**

**improvements to the environmental quality and accessibility of remaining green belt land.** The draft had reinstated a requirement that had been dropped in the 2024 version of the framework, but the government has now once again dropped the policy. It now considers that the wider policy, including the golden rules, “already provide an appropriate framework for securing compensatory improvements”.

**48. The definition of grey belt in the glossary of the document now removes the exception of areas where footnote 7 designations would restrict development.** “The government is satisfied that separate policy protection for footnote 7 areas remains in place and does not consider that substantial changes to the grey belt approach are necessary,” the consultation response document states.

**49. Policy GB8 states that major housing developments in the green belt should be subject to the NPPF’s golden rules regarding affordable housing and infrastructure provision.** It adds that the importance of complying with the golden rules should be given substantial weight.

**50. The policy sets out the three circumstances in which a site-specific viability assessment may be justified to allow contributions expected by the golden rules policy to be adjusted.** These are where a proposal is on brownfield land, where it is for a strategic site, or for a development “which is of a wholly different type to that assumed in the viability assessment that informed the development plan”. In these cases, it says, development should still “make the maximum possible contribution” to affordable housing and infrastructure. Development proposals that provide contributions significantly below the requirements “will only be acceptable in exceptional cases where fully evidenced and justified”, it adds.

### **Economy and town centres**

**51. Substantial weight should be given to the economic benefits of proposals for commercial development, according to policy E2.** When assessing whether there is an unmet need for such development, considerations should include whether market signals indicate an undersupply of specific types of land or premises, and whether a proposal’s specific locational requirements are met by existing allocations in the development plan, it explains.

**52. Policy E3 sets out criteria for assessing freight and logistic uses.** It says such proposals should have good access to transport networks, be sited and designed to limit environmental impact and provide sufficient and secure parking for lorries and other vehicles to cater for the anticipated use.

**53. The framework retains the town centre-first principle, including the sequential and impact tests for retail developments.** Policy TC1 is amended from the draft framework to make it clearer that residential development is appropriate only where it would not undermine the vitality and viability of the town centre. The framework retains the core principle that “main town centre use” should be located in centres and says a sequential test should be applied to proposals for main town centre uses when planning permission is required.

**54. But a proposal in the consultation draft to require developers to consider whether a single, large-scale scheme comprising retail or other town centre uses can be split up across multiple smaller, separate sites in town centres (under draft policy TC3), has been dropped.** The MHCLG says it has removed the wording on “disaggregation” policy following consultation feedback warning that including it in national policy could create “undue rigidity” in the operation of the sequential test. [More](#)

## Housing

**55. Under policy HO1, the preparation of strategic-level SDSs, where those exist, and local plans should be based on a housing need assessment that establishes the overall minimum number of homes needed in the area over the plan period, using the standard method.** The new plan-making policy for housing also changes existing policy to specifically reference the need to accommodate travellers.

**56. Policy HO2 says that where SDSs are not in place, the housing requirement figure should be higher than the identified local housing need level “where appropriate”.** This would include situations where more homes are required to meet the needs of neighbouring authorities, or where authorities have “significant growth ambitions”. The housing requirements for individual local authorities should be taken from SDSs, where those exist, and “should not be retested” during local plan formation unless there has been a “significant change in circumstances”.

**57. Local authorities will be required, under policy HO5, to set a minimum level of homes that should be built to accessible standards on major developments in their area, against a national baseline of 40 per cent.** This marks a change from the draft framework, which applied the accessible housing requirement to all kinds of development, not just major ones.

**58. On allocated sites, councils should use their local plan to set expectations for tenure mix “where this would be appropriate and deliverable”.** The government [scrapped proposals in the draft framework](#) for local plans to mandate a minimum level of social rent housing and to set expectations for a mix of tenures in 150-home-plus schemes

**59. The framework introduces a medium-size site category into the planning system.** This will cover developments of between ten and 49 homes, with an area of up to 2.5 hectares in size.

**60. A proposal in the draft NPPF to allow developers of medium-sized sites to provide cash contributions instead of on-site affordable housing provision is dropped.** The Ministry of Housing, Communities and Local Government (MHCLG) says consultation respondents had raised concerns that “it could have a detrimental impact on the manifesto commitment to deliver the biggest increase in social and affordable housebuilding in a generation”. [More](#)

**61. The government scrapped proposals in the draft framework for local plans to mandate a minimum level of social rent housing.** The department says many respondents argued it “could reduce local flexibility, fail to reflect site-specific viability constraints and risk slowing overall delivery of both affordable and market housing”, urging for social housing targets to

remain locally set. The MHCLG says it will instead “continue to require authorities to identify the proportion of social rent needed in their areas and set out requirements clearly in local plans”. [More](#)

**62. Under policy HO6, local plans should allocate at least ten per cent of the housing requirement to medium-sized sites of between one and 2.5 hectares.** The policy also retains the existing requirement for plans to allocate a further ten per cent to smaller sites of one hectare or less.

**63. Under decision-making policy HO8, proposals for military affordable housing should not be required to meet local plan requirements that stipulate a mix of affordable housing tenures.** This includes where military housing is delivered on its own or alongside other forms of affordable housing.

**64. New policy HO13 on the build-out of residential and mixed-use development encourages local authorities to impose planning conditions on applicants “requiring that development begins within a timescale shorter than the relevant statutory default period”.** However, it says this should be done only where it would speed build-out “without threatening its implementation or viability”.

**65. The fact that an up-to-date calculation of local housing need is higher than the local housing requirement should not be considered evidence of unmet housing need for a period of five years from adoption of a plan, as long as certain conditions are met.** These are that the planning authority can demonstrate a five-year supply of deliverable housing sites (with the appropriate buffer) and where the housing delivery test indicates that the delivery of housing is more than 75 per cent of the housing requirement over the previous three years.

## **Climate change**

**66. Local authorities should consider the risk of wildfires when drawing up local plans and should propose development patterns that “contribute to radical reductions in greenhouse gas emissions”.** The plan-making policy CC1 on climate change says local plans “can” be informed by an assessment of baseline carbon emissions and the potential effect of development options on future emissions.

**67. New decision-making policy CC2 on the mitigation of climate change states that projects should, “where relevant”, deliver a variety of sustainability benefits.** These include:

- Being located close to local facilities and amenities.
- Conserving energy through design approaches.
- Reusing existing materials.
- Connecting to decentralised heat networks.
- Contributing to habitat restoration.

**68. Under CC2, substantial weight should be given to improving the energy efficiency of existing buildings through a development proposal.** Likewise, substantial weight should be given to the use of renewable or low-carbon sources or heat networks.

**69. Policy CC3 addressing adaptation to climate change requires decision-makers to consider the “potential impacts of climate change over the lifetime of the scheme”.** Previously, policy did not specify that it has to go further than considering existing impacts.

## **Heritage**

**70. The new NPPF has overhauled the long-established test for assessing the impact of development proposals on heritage assets, which now includes consideration of the potential positive heritage effects of the scheme.** The framework introduces four “tiers” for assessing impact on heritage assets, from “having a positive effect” to causing “the total loss”. Revised policy HE5 on assessing effects on heritage assets states that it is the effect on an asset’s significance rather than the scale of the development that should be considered by decision-makers. [More](#)

**71. The new framework revises the weight given to the consideration of the potential effect of a development on a designated heritage asset from “great” to “substantial”.** In the consultation, the MHCLG says the change “is intended to improve consistency in how weighting is applied [...] rather than to signal any change in weighting to be given to the conservation of designated heritage assets”. However, a blog on the new NPPF by consultancy Bidwells points out that “even if intended as standardised language, ‘substantial’ is presented as the highest tier of weight available”. [More](#)

**72. A new paragraph (3) has been added to policy HE6 since the consultation draft, pointing out that “any harm to a designated heritage asset will be a matter of considerable importance and weight” when considering proposals.** The addition is “to make the importance of designated heritage assets absolutely clear”, the consultation response says.

## **Viability**

**73. A proposal in the draft framework for a national benchmark land value to be used by development plan-makers when assessing the viability of greenfield sites on green belt is scrapped in the final document.** The government’s consultation response said that the approach “could provide greater transparency”, but the risks outweigh the potential benefits. It acknowledged “strong opposition to the proposal” from consultation respondents. [More](#)

**74. The government has decided not to take forward a technical annex that was included in the draft that set out standardised inputs in viability assessment.** “While we understand the need for a consistent framework for evaluating development proposals and certainty in the viability assessment process, we consider that further engagement is needed with local planning authorities (LPAs), developers, development surveyors and other key stakeholders,” it says in the consultation response document. These standardised inputs will instead remain in the non-statutory Planning Practice Guidance (PPG).

## Community assets

**75. The document introduces stronger protections for pubs and music venues at threat of closure. Under decision-making policy HC6, developers seeking to convert such facilities will need to prove there is “no reasonable prospect of the use being retained”.** The draft framework had proposed only applying the protection to such facilities if they are the last of their kind in a local area, but that restriction has been removed. [More](#)

**76. Decision-making policy HC7 retains the previous framework’s principle that development proposals should not result in the loss of open space, sports and recreational buildings and land.** Whereas the previous framework only stated that this includes playing fields and “formal play spaces”, the new policy extends this by also citing “informal play spaces and allotments”.

## Enforcement and unauthorised development

**77. Policy DM8 states that “intentional unauthorised development” should be given “substantial weight” in determining retrospective applications.** A 2015 written ministerial statement only made deliberate development without permission a “material consideration”. [More](#)

## Travellers

**78. The new NPPF incorporates the government’s planning policy for traveller sites (PPTS).** The PPTS was formerly a separate document that had needed to be considered alongside the framework. This aims to “reduce unnecessary duplication”, “support equitable outcomes within the planning system” and provide “greater clarity on how traveller sites should be planned for and delivered”, according to the consultation response. [More](#)

**79. The new framework requires plan-makers to consider the needs of travellers in the preparation of SDSs and local plans, where SDSs are not in place.** Policy HO1 states that requirements for SDSs should be informed by an assessment of traveller site need. This approach recognises that such needs “are best planned for at the strategic level”, the consultation document says. Policy HO2 says that pitch and plot requirements in plan-making should reflect the extent to which permanent and transit site needs of travellers in the area can be “accommodated as fully as possible”.

**80. Plan-making policy HO3 requires plan-makers to identify a supply of specific deliverable traveller sites for five years after the intended plan adoption date.** Policy HO5 requires plans to identify traveller sites that are “suitable for mixed residential and business uses”.

**81. Policy HO12 says that proposals for traveller sites should be located to “provide a settled base”.** Requirements in the draft framework for traveller site locations to limit “the need for long-distance travelling and potential environmental damage caused by unauthorised encampment” are removed in the final document. The government noted in the consultation response that responders had said the “long-distance travelling” wording “could be clearer”. [More](#)

**82. Green belt boundaries should only be altered to meet the need for a traveller site if that site is allocated in a development plan.** Policy GB3 in the new framework states that if councils wish to make an “exceptional, limited alternation” to a defined green belt boundary “to meet a specific, identified need for a traveller site, it should be specifically allocated in the development plan as a traveller site only”.

#### **Vision-led transport approach**

**83. Sustainable transport considerations should form part of early engagement with local communities when drawing up local plans, under plan-making policy TR1.** The policy also says that plan-makers “may” set thresholds for what constitutes a significant amount of movement arising from new development, against which to make planning decisions.

**84. Policy TR2 states that local plans should set local parking standards.** The previous NPPF suggested this as an option.

**85. The government will revise its PPG on transport to provide further information on the “vision-led” transport approach to support its “consistent application” in plan-making, the consultation document revealed.** The guidance will include clarification on when the vision should be established and how authorities may set local thresholds for significant movement, it said.

**86. In the final NPPF, electric vehicles have been added to the indicative list of transport facilities that may need to be planned for.**

**87. The final version of the framework also removes ultra low and zero emission vehicles and car-sharing from the definition of sustainable transport modes.** This, the consultation response says, “aligns more fully with what the government regards as sustainable transport”.

#### **Mineral extraction, including coal, oil and gas**

**88. The development plan should provide for a “sufficient and timely” supply of minerals of national and local importance.** The word “timely” has been added to plan-making policy M1 since the consultation draft to clarify that plans should “ensure minerals supply is both adequate in overall terms and responsive to changes in market demand”, the consultation response says.

**89. Minerals are “essential” to provide infrastructure, buildings, green energy and goods.** The word “essential” was added to the final framework “to reflect established terminology and to recognise the importance of minerals in delivering wider government objectives”, the response document says.

**90. Local authorities’ development plans should not identify new oil and gas sites outside licensed areas, and should not identify any sites at all for coal or peat extraction.** Plans should distinguish between the exploration, appraisal and production phases of oil and gas developments.

**91. “Substantial weight” should be given to the benefits of mineral extraction and processing in decision-making, including works that facilitate the exploration and extraction**

of a new category of “critical and growth minerals”. These are defined in policy M3 as minerals that support either the green energy transition, net zero, national security or the government’s industrial strategy.

**92. In decision-making, applications for peat extraction should be refused, while proposals for new coal mines or onshore oil and gas extraction should only be approved in limited circumstances.** Decision-making policy M5 says proposals involving surface or underground coal workings, or for onshore oil and gas extraction, must facilitate the exploration or production of oil and gas in areas where the North Sea Transition Authority has granted petroleum rights; be necessary for public safety; or target the capture and use of methane from coal mines. The final NPPF adds that such proposals could also be approved if it is necessary for the extraction of other minerals of national or local importance, or for the purpose of ground stabilisation or to enable other development. These amendments seek to avoid “unintended constraints on development while maintaining the overall policy approach to coal extraction”, the consultation response says.

## 5. Commentary and parts of the NPPF 2026 to note

- 5.1. It is a different format.
- 5.2. **CC3 1 e** – this is about design response to potential impacts of climate change. It is about wildfires and not providing fuel for fires (such as timber fences) and incorporating firebreaks.
- 5.3. **DM8 2** – enforcement: if a breach is proven to have been intentional, that fact should be given substantial weight when considering whether to grant permission or not.
- 5.4. The term ‘walking distance’ is defined in the glossary.
- 5.5. **CC2 1 f** – protects peatlands in a stronger way.
- 5.6. **CC2 2** says ‘Substantial weight should be given to the benefits of improving the energy efficiency of existing buildings... *inter alia*... where this would be achieved through proposals for development’. We tried to look at improving the energy efficiency of existing buildings in the emerging Local Plan but could not make it work.
- 5.7. **CC2 2** and **DP 1 2 b** – refers to overheating – stronger emphasis.
- 5.8. **CC3 2** – 2 says ‘Substantial weight should be given to the benefits of improving the resilience of existing buildings and public spaces to anticipated climate change impacts where this would be achieved through proposals for development’.
- 5.9. Climate resilience and wildfire mitigation are new, explicit considerations under Policy **CC3**.
- 5.10. **HC4 2** – says to engage local communities in the design of community facilities and public infrastructure.
- 5.11. The term ‘physically well-related’ appears a lot but is not defined.

- 5.12. Major development (as in numerical) has the same definition as now. But medium development is 10 to 49 dwellings.
- 5.13. BNG can only be above 10% for certain sites allocated in the Local Plan and not area wide.
- 5.14. **HO2 1** – SDS will establish a housing requirement for each LPA in the SDS area – so that includes us.
- 5.15. **Section 10** in relation to renewables/low carbon is very light. We have lots more considerations in our renewable energy policy.
- 5.16. There is mention of women and girls in terms of design. But will there be guidance as to what makes something safe for women and girls?
- 5.17. **PM13 1 b ii** – talks about going beyond building regs for water use – would support our 90l/h/d proposed for the emerging Local Plan.
- 5.18. **HO9 1 a i** and **b ii** – supports our policy on elderly and specialist housing needing to be in development boundaries.
- 5.19. **HC6 a** – this uses a marketing period of 12 months, like we do for our marketing periods set out in our Local Plan.
- 5.20. **P3 2 d** – generally supports protecting tranquillity.
- 5.21. **N policies** support biodiversity enhancements.
- 5.22. **Annex C** sets out information requirements. This will be of importance when various parts of the NPPF are used. This will take some getting used to.
- 5.23. On occasion, the term ‘should be refused’ is used but on occasion wording along the lines of ‘should only be supported if’ or ‘should not be supported unless’ are used.

## 6. Protected landscapes

- 6.1. Generally, Protected Landscapes still have protection. Some wording changes are helpful; some not so much.
- 6.2. One of the key asks by Protected Landscapes in response to the consultation was the restoration of the NPPF presumption to refuse major development. This has happened (**Policy N4**). This is important as presumption to refuse policies, unless certain criteria met, are rare. They are referred to throughout the NPPF as representing special circumstances to counter saying yes as default.
- 6.3. There is reference now to natural rather than scenic beauty.
- 6.4. Another ask from Protected Landscapes to keep the wording ‘highest level of protection’ in relation to Protected Landscapes and their purposes, has not happened. This is disappointing but matches overall approach of the NPPF in relation to only two levels of weight– normal and substantial weight.

- 6.5. **N1 c** – says ‘This should include limiting the scale and extent of development within Protected Landscapes...’
- 6.6. Special qualities of protected landscapes are referenced in **N4**. Previously it was our purposes and duty that were engaged in the planning system via the NPPF.
- 6.7. The loss of the reference to the DEFRA Circular 2010 is disappointing but it remains a key document as it has not been withdrawn.
- 6.8. There is reference to the seek to further duty early on in the NPPF (**footnote 2**). In addition, there is mention of mitigating adverse impacts on special qualities and statutory purposes.
- 6.9. Policy **S1** on positive plan making continues to acknowledge the special status of National Parks through footnote 24 and our ability to look differently at housing need and supply. This is similar to the previous NPPF’s approach.
- 6.10. It is now explicitly stated development plans should have regard to protected landscape management plans (Policy **N1**), which is helpful as are the multiple references to LNRS’s, enabling them to have spatial dimension in plans (e.g. allocations).
- 6.11. The former “great weight” is replaced with “substantial weight” for conserving and enhancing natural beauty, wildlife and cultural heritage. The Government’s response states this is not intended to diminish the weight given to these areas.

## 7. Presumption in Favour of Sustainable Development

- 7.1. The main change lies in the interaction between **Policies S3 to S5**, which introduce a wider presumption in favour of sustainable development, and policies that set out circumstances where it may not apply, including **Policy N4** on protected landscapes and **Policies HE6/HE7** on heritage assets. This approach seems to replace the use of footnote 7 in the previous 2024 NPPF.
- 7.2. The presumption is effectively a “default yes”: development should be approved without delay unless its benefits are “substantially outweighed by any adverse effects” when assessed against the national decision-making policies.
- 7.3. **Policy S3** sets out the presumption and when it applies.
- 7.4. Within settlements (**Policy S4**) the presumption is always applied.
- 7.5. Outside settlements (**Policy S5**) it applies in specified circumstances, including (non-exhaustively):
  - a) Agriculture and forestry development
  - b) Development for nature conservation, restoration and enhancement
  - c) The re-use of buildings of permanent and substantial construction

- d) Limited infilling within group of houses (not currently supported by the Authority outside settlements in the Local Plan's hierarchy)
  - e) Development on land close to busy railway stations
  - f) The redevelopment of previously developed land
  - g) Development on the edges of settlements where there is no up to date development plan or insufficient housing supply.
- 7.6. Policy **S4** names Policy **N4** (the “Protected Landscapes” Policy) as a possible reason to disapply the presumption; Policy **S5** instead refers to any national decision-making policy requiring refusal in specific circumstances. Under the 2024 NPPF the presumption only applied where there was no up-to-date plan or insufficient housing supply, and National Park designation could form a ‘strong reason for refusal.’

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