Government consultation on a revised National Planning Policy Framework

A summary by Civic Voice

1. The National Planning Policy Framework (NPPF) is the primary policy statement in planning. It has the status of a material consideration in the determination of planning permissions and specifies, in addition, the form and contents of development plans, including Local Plans and the new Spatial Development Strategies specified in the Planning and Infrastructure Act 2025. The full proposals and the consultation documents can be accessed here.
2. This, the second revision to the NPPF in just over a year, is intended as a significant rewrite of its predecessors. The accompanying explanatory document talks about a 'seismic regearing', with three main objectives:
   'Ensure national planning policy is accessible and understandable for everyone',
   'Establish a comprehensive suite of national policies on general planning matters', and
   'Make the policy which it contains more 'rules-based' and certain'.
3. Of these three stated objectives, the first, making national planning policy accessible to all, is probably the most relevant to local civic and amenity societies. Unfortunately, the objective is not realised. Community engagement is restricted to plan making. Local societies must therefore be prepared to comment on local and strategic plans, including making an appearance at public examinations rather than wait for specific development applications.
4. Moreover, the proposed NPPF includes no obvious way that the adequacy of community engagement will be tested and assessed at a public examination or anywhere else. The adequacy of community engagement is not for example an aspect of the 'soundness' of a plan. Further, in determining a planning application, the revised NPPF declares that local planning authorities should 'consult statutory or internal consultees only where it is necessary to do so.' Internal consultee is not defined, but might reasonably be interpreted as covering civic societies. Much in this context will depend on local practice and whether the local council wishes to encourage or accept comments from local groups.
5. The second objective, to establish a comprehensive suite of national policies, is the most obvious influence on the contents. The revised NPPF is a top-down policy reform that is intended to ensure some basic consistency in how national policies are applied. There is nothing new in this. Previous versions of the NPPF had a similar function and much of the content of the revised NPPF amounts to a restatement of good practice and is likely to prove uncontroversial.
6. In addition, though the main aim is to promote house building and growth, the proposed NPPF contains some useful clarifications for heritage and environmental protection. For example, the question of harm to designated heritage assets is now split into three categories: 'harm', 'substantial harm', and 'total loss', with a new definition of substantial harm. Further, a new chapter is included on the provision and protection of clean energy and clean water, with additional requirements and provisions.
7. The third objective, promoting a more certain, rules-based system, is not applied consistently. Contrary to the stated objective and apart from issues concerned with design and density, the proposed reforms are mostly consistent with a flexible, discretionary system, as at present,

rather than a system based on clearly defined rules. The typical format in the revised NPPF is to announce a general principle and then to specify a series of qualifications or exceptions that are open to interpretation.

8. For example, the revised NPPF wishes to extend the presumption in favour of sustainable development and does so by saying that such a presumption applies to development within settlements. However, the NPPF then goes on to qualify the presumption with reference to a series of exceptions that define 'unacceptable impact'. Outside of settlements there is no presumption in favour of development, but development may still be permitted if it falls within a series of predefined categories and where 'the benefits of approving development proposals are likely to be substantially outweighed by adverse effects'.

9. As to other, more specific contents, here are some of the more striking points:
   - The new spatial development strategies, produced by regional mayors, will tell local councils how many houses (and traveller pitches) each must plan for. Outside London and a few other large urban areas where a strategic plan is already in place or under preparation, local societies will have to deal with a new, wider and therefore more abstract level of intervention and will probably need to co-operate with other nearby societies in seeking to influence policy.
   - Future local plans should all be prepared and adopted within 30 months (a very demanding timetable).
   - Development for housing and mixed-use development is to be allowed and encouraged within a reasonable walking distance of a railway station.
   - Minimum densities should be identified throughout a district, varied by location, but with the intention of securing an overall increase.
   - Recreational buildings and land should be protected, subject to escape clauses and qualifications and intended to cover the loss of statutory consultee status by Sport England.

10. Apart from specific points of concern, Civic Voice would like to learn from its members as to the design of a realistic and practical planning policy framework that might meet their interests. The omissions from the proposed NPPF are as significant as the inclusions. The final deadline for making comments to government is 10 March 2026. If you would like to contribute to the Civic Voice response, please send your comments no later than 10 February 2026 to the chair of the Expert Panel, by email, at barrygoodchild@wakefieldcivicsociety.org.uk