

**100**  
YEARS



Campaign  
to Protect  
Rural England

# **CPRE's Response to the National Planning Policy Framework Consultation (issued December 2025)**

**Date of response March 2026**

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## Summary

### 1. OVERVIEW

CPRE broadly welcomes elements of the proposed National Planning Policy Framework (NPPF) update—especially the clearer separation between **plan making** and **decision making** policies—while raising significant concerns about **centralisation, weakening of environmental protections, housing delivery mechanisms, and the threat to the Green Belt.**

A consistent theme of our response is the need for a **brownfield first, plan-led, community centred, climate aligned planning system, with local discretion** protected rather than eroded.

### 2. PLANMAKING POLICIES

#### 2.1 National Development Management Policies (NDMPs)

**Position:** CPRE opposes statutory NDMPs overriding local plans.

**Recommendations:**

- If introduced in future, NDMPs must be subject to full public consultation, Parliamentary scrutiny, and environmental assessment.
- NDMPs should set **minimum standards only**—local plans must be free to exceed them.
- The government should monitor the impact of the NPPF on an annual basis, using the most relevant **UN Sustainable Development Goals as the basis of a balanced scorecard.**

#### 2.2 Spatial Development Strategies (SDS)

**Support with concerns.** SDSs could restore strategic planning but risk becoming housing number dominated exercises.

**Key recommendations:**

- Embed a **brownfield-first approach**, including measurable brownfield delivery targets.
- Maintain Green Belt extent; restrict “grey belt.”
- Require **≥10% social housing** in all major new development across SDS areas.
- Integrate transport planning from first principles; prioritise regeneration.
- Mandate **Strategic Environmental Assessments** for all SDSs.
- Strengthen expectations for meaningful public participation.

**Five-Year Alterations:**

Oppose mandatory 5-year SDS updates; recommend changes only where evidence materially shifts. Strongly support allowing SDS housing figures to continue beyond 5 years where need has not significantly changed.

### 2.3 Local Plans

**Concerns:** PM2 reverts to “numbers led” planning.

**Recommendations:**

- Require local plans to adopt **strategic brownfield first** spatial strategies.
- Make community engagement central and ongoing.
- Recognise climate resilience, nature recovery, and food security as strategic constraints.
- Strongly oppose the removal of the scope of local authorities to set qualitative standards for energy efficiency and generation in new development. We recommend that the government restores the current NPPF wording in the final version.
- Minimum **15year plan period** supported.

### 2.4 Evidence, land identification, and cross boundary working

- Evidence must be **proportionate, plain language, transparent**, and include early community involvement.
- Land identification must be **LPA led**, not developer-led; clear expectation to assemble brownfield land and avoid BMV agricultural soils.
- New cross boundary mechanisms (PM10–PM11) will only work if tightly integrated with SDS governance.

## 3. DECISIONMAKING POLICIES

### 3.1 Application requirements (DM1–DM3)

CPRE argues DM1 is too narrow—information should be required for **all scales** of development proportionate to impact.

**Recommendations:**

- DM2 should explicitly require **nature recovery, carbon assessment**, and **accurate** technical information.
- Preapplication engagement standards must be strengthened.

### 3.2 Developer contributions and viability (DM5, PM12)

CPRE strongly opposes proposals that allow developers to bypass affordable housing and infrastructure contributions.

**Recommendations:**

- Set clear, upfront contribution expectations at both SDS and Local Plan level.
- Reject viability as a route to dilute policy commitments; unviable schemes should be refused.
- Viability should assume a **minimum 5year stability period** post consent.
- Require **open book transparency**, and downweigh “land price paid.”
- Consider a simpler, more consistent reform such as a **revised CIL or land value capture mechanism**.

### 3.3 Enforcement and unauthorised development (DM8)

#### Recommendations:

- Retrospective permission should be exceptional only.
- Expand enforcement capacity nationwide.
- Recognise specific harms from unauthorised development (habitat loss, light pollution, highways impacts).

## 4. SUSTAINABLE DEVELOPMENT

### 4.1 Spatial strategy (S1–S2)

CPRE warns that rigid spatial strategies tied to inflated housing targets lead to greenfield pressure and speculative development.

#### Recommendations:

- Prioritise brownfield and regeneration opportunities.
- Link spatial strategy to real deliverability and environmental constraints.
- Tighten settlement definition to prevent “paper settlements” created by allocations.

### 4.2 Presumption in favour of sustainable development (S3–S5)

CPRE strongly disagrees with S5 for development outside settlements.

**Major risks:** countryside loss, car dependent growth, reliance on flawed Housing Delivery Test.

#### Recommendations:

- Delete S5(1)(b), (e), and (j).
- Rewrite S5 to require **sequential brownfield and settlement tests**.
- Station led development **must** be within existing settlements, not rural locations.
- Define clear criteria for weighing “adverse effects.”

## 5. CLIMATE CHANGE (CC1–CC3)

### 5.1 Mitigation

#### Key recommendations:

- Mandatory baseline carbon assessments for spatial strategies and allocations.
- Align all plans with **national carbon budgets**.
- Require lifecycle (embodied + operational) carbon assessments for major developments.
- Strengthen protection for **peaty soils** and existing carbon stores.
- Require at least **20% decentralised/local low carbon energy** in new developments (“Merton Rule 2.0”).
- Refuse applications that do not significantly improve energy efficiency.

## 5.2 Adaptation

- Encourage upland rewetting and natural flood management.
- Strengthen wildfire risk policy and link SDSs to best land management practices.

## 6. HOUSING (HO1–HO13)

### 6.1 Housing Need and the Standard Method

CPRE criticises the Standard Method as flawed and disconnected from local need—especially in rural areas.

#### Recommendations:

- Housing need should primarily be derived from **local surveys** with clear tenure splits.
- Standard Method should not be mandatory; if used, must be updated and not stock based.

### 6.2 Affordable Housing

- Welcome the proposal to allow for affordable housing on the smallest sites in most rural areas, compared to only half of rural England which at present is covered by protected landscapes or Section 157 designations on re-sale of affordable homes
- Minimum **10% social rent** in all major developments (>100 homes), potentially as low as 50 homes. This policy should apply in all areas without an adopted local plan that sets higher standards.
- Support National Housing Federation call for **25% social rent** where possible.
- Require ringfenced, locally spent commuted sums only as an exception.

### 6.3 Traveller Sites

- Fully support integration of the Traveller Sites policy but call for much **clearer national guidance** on assessing need.

### 6.4 Housing Land Supply & HDT

CPRE strongly disagrees with:

- 20% buffers
- punitive consequences for HDT failure
- reliance on delivery tests driven by developers

#### Recommendations:

- Remove Annex D 20% buffer provisions.
- Reduce HDT thresholds or scrap HDT entirely.

### 6.5 Largescale and strategic sites

#### Recommendations:

- Require SDS–Local Plan partnership for all strategic sites.
- Brownfield and infrastructure first.
- Public transport should be provided so that it is available when the first residents move in; similarly early retail provision is also needed.
- Require transparent governance and long term stewardship.
- Strengthen HO13 to prevent slow buildout and gaming of “commencement.”

## 7. ECONOMY (E1–E4)

### 7.1 Economic strategy

#### Recommendations:

- Mandate **net zero commercial buildings**, including solar as standard.
- Recognise rural economic potential in local food, fibre, timber, and land based industries.
- Develop a **national rural strategy**.

### 7.2 Logistics & freight

CPRE warns of harmful large-scale logistics sprawl, often targeting Green Belt.

#### Recommendations:

- Require freight to use **rail/water for most of the journey**.
- Reject car dependent mega warehouses in rural areas.
- Assess cumulative HGV movements; refuse >1,000 daily HGV trips unless sustainable alternatives exist.

## 8. LAND USE & DENSITY (L1–L4)

### 8.1 Brownfield-first

#### Key recommendations:

- Mandate measurable brownfield targets in SDSs and Local Plans.
- Update Brownfield Registers annually and create a national database.
- Brownfield with ecological value should be protected, not allocated.

### 8.2 Densification & typologies

- Substantial weight should be given to brownfield redevelopment.
- Minimum densities near stations should be raised to **≥62 dwellings/ha** (based on transport viability evidence).
- Station led growth must be **within settlements only**.

## 9. NATURAL ENVIRONMENT

### 9.1 Landscape, nature, soils

#### Recommendations:

- Strengthen protection for valued landscapes outside designated areas and require the intrinsic value of the countryside to be considered in decision-making.
- Require site specific soil surveys and stronger protection of BMV agricultural land.
- Increase Biodiversity Net Gain **above 10%** for sensitive areas/species.
- Invest at least **£43m/year** in LPA ecological capacity.

### 9.2 Light pollution, tranquillity, access

- Reinstate support for local plan tranquil area designations.
- Strengthen light pollution policy wording.
- Protect rights of way and require multimodal travel hubs.

## 10. GREEN BELT (GB1–GB8)

CPRE expresses **strong opposition** to weakening Green Belt protections.

### 10.1 Key objections

- Rejects the “**grey belt**” concept—demonstrably being used to release high-quality farmland and local wildlife sites and not just supposed ‘poor quality’ land.
- Opposes station based Green Belt release (GB7h).
- Opposes broader categories of “not inappropriate” development that threaten openness.
- Warns viability assessments risk undermining contributions (GB8).

### 10.2 Recommendations

- Remove grey belt entirely.
- Require Strategic Green Belt Assessments as the only route for any release.
- Prohibit station-led development in rural Green Belt locations.
- Set an **affordable housing floor** (income based) for any Green Belt release.
- Tighten PDL definition to prevent gaming with mostly greenfield sites.

## 11. MINERALS, ENERGY, WATER

### 11.1 Minerals

#### Recommendations:

- Prohibit **all new coal extraction** and accelerate phaseout of oil and gas.

- Prohibit peat extraction, including ancillary proposals.
- Exclude energy minerals from safeguarding policies.
- Require restoration bonds more routinely.

### 11.2 Energy

- Reinstate landscape/visual impact protections for renewables.
- Oppose relaxing criteria for off plan energy sites.
- Require robust integration with strategic energy planning (RESP/SSEP/CSNP).

### 11.3 Water

- Water infrastructure must demonstrate need; W4(2) should be removed or qualified.
- Prioritise efficiency, reuse, smart metering, and nature based solutions.

## 12. TOWN CENTRES

**Supportive of TC1–TC4**, especially intensification, sequential tests, and reuse of upper floors.

### Recommendations:

- Reintroduce policy on safeguarding and revitalising markets.
- Encourage regeneration of edge of centre brownfield sites.
- Retain the sequential test and impact assessments.

## 13. COMMUNITY, HEALTH, AND AMENITY

### Recommendations:

- Strengthen protection of community facilities; remove “last of its type” flexibility.
- Mandatory community engagement in design.
- Set minimum standards for green space and bus services.
- Treat health outcomes as a strategic priority in Local Plans.

## 14. OVERARCHING SYSTEMIC RECOMMENDATIONS

CPRE identifies wider systemic changes needed for a sustainable, credible, plan-led system:

### A. Restore a genuinely plan-led system

- Remove policies that allow speculative development due to housing supply manipulation.
- Protect up to date plans from being undermined by national tests.

### B. Brownfield first as a binding principle

- Mandated targets, ringfenced funding, capacity for assembly and remediation.

### C. Climate alignment

- Carbon budgets embedded in all plan-making and decision-making.

**D. Infrastructure-first**

- Public/active transport embedded from the outset; “vision and validate” approach nationally required.

**E. Strengthened public trust**

- Transparent viability, proper scrutiny, integration of community knowledge, robust enforcement.

## 1. Introduction

### 1. Do you have any views on how statutory National Development Management Policies could be introduced in the most effective manner, should a future decision be made to progress these?

CPRE welcomes the government's decision to not introduce statutory national development management policies (NDMPs). We argued against the introduction in 2023 of the legal powers that would have meant that.

NDMPs automatically overrode development plan policies, mainly on the grounds that it represented an unwarranted centralisation in the system and would have undermined public faith and involvement in plan making.

CPRE recommends that if the power to introduce statutory NDMPs is used in the future:

- There should be clear and transparent processes for public involvement, with all NDMPs subject to at least the same levels of consultation and parliamentary scrutiny (and where relevant, environmental assessment) as is currently mandated for National Policy Statements for national infrastructure.
- Any NDMPs should be worded in such a way as to not undermine local plans. They should be worded in such a way that sets the minimum standard for new development, which local plans should exceed where local circumstances justify it. In our response to the 2024 NPPF consultation, we highlighted that a statutory NDMP might have application in setting minimum expectations for the provision of social housing in large new housing developments. (See also our response to Chapter 6.) Other relevant areas where national policy should set minimum expectations, but not prevent higher local standards, include energy efficiency standards (see our response to Chapter 2) and biodiversity net gain in new developments (our response to Chapter 19).

### 2. Do you agree with the new format and structure of the draft Framework which comprises separate plan-making policies and national decision-making policies?

Strongly agree.

The format and structure proposed appears easy and sensible to use. We also support incorporating the text currently included in footnotes into the body text where possible, as since the NPPF was introduced the most significant and oft-quoted areas of policy have often been contained within the footnotes (for example on exemptions from the presumption in favour of sustainable development.)

3. Do you agree with the proposed set of annexes to be incorporated into the draft Framework?

Neither agree nor disagree.

4. Do you agree with incorporating Planning Policy for Traveller Sites within the draft Framework?

Strongly agree.

Including the Traveller Sites policy within the main body of the NPPF makes complete sense from our perspective.

5. Do you agree with the proposed approach to simplifying the terminology in the Framework where weight is intended to be applied?

Partly disagree.

CPRE welcomes the proposal to use 'substantial weight' consistently rather than the current confusion of different terms that have the same effect.

We also welcome the clarifying references to the Planning Practice Guidance in draft paragraph 13.

We welcome the reference to the purpose of planning in draft paragraph 14.

We disagree with the treatment of the UN Sustainable Development Goals (SDGs) at draft paragraph 16, as we have done since the wording was first introduced in 2012. The current wording means that the SDGs have no measurable or meaningful influence on planning policy implementation. We recommend that the government should commit to evaluating the impact of the NPPF on a regular (at least annual basis), using the SDGs as the basis of a balanced scorecard approach judging progress against the economic, social and environmental objectives listed at paragraph 16.

## 2. Plan-making Policies

### 6. Do you agree with the role, purpose and content of spatial development strategies set out in policy PM1?

Partly agree.

CPRE strongly supports a genuinely plan-led planning system, with up-to-date development plans as the primary basis for decisions, because plans are the best way for communities to shape how their area changes, to direct growth to the most appropriate and sustainable locations, and to provide the certainty needed to secure infrastructure and environmental improvement. Against that backdrop, we partly agree with the role and purpose of Spatial Development Strategies in policy PM1. Done well, SDSs could help restore strategic planning, deal with cross-boundary needs, and give a clearer framework for infrastructure and regeneration. In that respect, we welcome PM1's intent that Spatial Development Strategies set a positive vision for growth and change. We would welcome a period of stability with the right rules in place.

Our concern however is that PM1 currently reads as though the primary purpose of SDS's will be to simply assign and adjust housing numbers. In this respect, the policy should make clearer that an SDS is not just a number-setting exercise and that the arising spatial strategies are explicitly constraints-led and outcome-led.

CPRE recommends that the final PM1 should state that SDSs reflect the following priorities and contain policies to give effect to the priorities:

- A clear brownfield-first approach, including a target for brownfield completions as a proportion of all completions across the SDS area, prioritising major new housing development within urban areas needing regeneration. These worked well for the former regional spatial strategies (RSS).
- Maintain overall Green Belt extent, providing clarity about where exceptional circumstances for planned Green Belt release may exist, and strictly limiting the scope for 'grey belt' designation in local plans.
- Protect identified valued landscapes not covered by national designations.
- Set ambitious targets for increasing the provision of rural affordable housing, specifically including the delivery of at least 10% of all major new development as social housing, and not just be about total housing numbers, which won't address the housing crisis in a meaningful way.
- Integrate transport planning from first principles. Thinking about and providing for transport is not something which should be seen as an 'add on' at a later stage, it is essential that it is considered from the outset. Currently, as worded, Policy PM1 does not reference transport specifically until sub-section 'f'.

- Encourage SDSs to integrate planning policies with policies on wider land use such as farming and forestry, and to contribute towards the policy outcomes of the government’s expected Land Use Framework, so that an integrated approach to climate mitigation and adaptation, nature recovery and the provision of food and energy is introduced. Our forthcoming report on land use tools (CPRE March 2026) provides examples of where emerging strategic authorities in Greater Manchester, Northumberland, Devon and Cornwall are already pioneering such approaches.
- Provide a clear spatial framework for investment and growth, including for new housing, while integrating the economic requirements with meeting social and environmental needs. Their content should be genuinely strategic in nature and allow for more detailed issues to be considered and addressed through other parts of the development plan.
- Supporting social well-being and cohesion by ensuring adequate provision is made for open spaces and blue and green infrastructure as well as for homes of high environmental quality.
- Supporting a healthy environment and protecting human health, food security and important landscapes by incorporating considerations of harmful emissions, climate change and air quality into policies. and for nature recovery and climate resilience to be treated as strategic essentials, alongside transport, water and other utilities.

We also recommend strong expectations for meaningful public participation matching the new duties with proper resourcing, or SDSs will add delay and uncertainty rather than reduce it.

See also response to question 48.

### 7. Do you agree that alterations should be made to spatial development strategies at least every 5 years to reflect any changes to housing requirements for the local planning authorities in the strategy area?

Partly disagree.

PM1 already provides a clear framework for keeping SDSs up to date, including monitoring and replacement no later than 10 years, and earlier replacement where there is significant change or new evidence of needs, opportunities or constraints. A blanket requirement to alter SDSs “at least every 5 years” specifically to reflect changes to housing requirements risks turning SDSs into a rolling number-reset exercise, creating uncertainty, diverting scarce plan-making capacity, and undermining the ability of SDSs to provide a stable strategic framework for infrastructure, regeneration, climate resilience and nature recovery. We would therefore favour an approach where alterations within five years are expected only where there has been a material change in relevant evidence or regarding constraints and deliverability, rather than as a default administrative cycle.

We strongly support the vision-led approach, which integrates spatial and transport planning, referred to elsewhere in the consultation (policy TR1). Vision led planning is iterative and holistic, embracing

flexibility, learning from past mistakes, and adapting to uncertainty. Validation, i.e. monitoring and evaluation, is essential to vision-led planning. Each SDS will require annual monitoring to ensure progress is being made. Review of SDSs should be subject to the results of such monitoring.

**8. If spatial development strategies are not altered every five years, should related policy on the requirements used in five year housing land supply and housing delivery test policies, set out in Annex D of the draft Framework, be updated to allow housing requirement figures from spatial development strategies to continue to be applied after 5 years, so long as there has not been a significant change in that area's local housing need?**

Strongly agree

Allowing SDS housing requirement figures to remain in force after five years, where there has been no significant change in local housing need, would provide certainty and reduce incentives for speculative development based simply on the housing requirement being treated as out of date simply because of a default administrative cycle. Although Local Plans deal with a different level of policy and allocations, these need to be updated to reflect changes in SDS and this has a resource implication.

**9. Do you agree with the role, purpose and content of local plans set out in policy PM2?**

Partly disagree.

Whilst PM2(1) starts positively enough, unfortunately it rapidly reverts to a focus on the minimum amount of development to be provided. To us, this is secondary to the real test as to whether the plan is securing the right development in the right places, with the right infrastructure and environmental outcomes. Instead, much of the wording of PM2 simply reinforces the familiar numbers-led mindset rather than a genuinely plan-led approach to sustainable development, limiting scope for quality place-making.

In terms of specifics, CPRE recommends that PM2 should:

- expect a strategic brownfield-first approach within the local plan spatial strategy and allocations, so that regeneration and reuse are genuinely prioritised before greenfield release in line with targets set in SDSs.
- Reflect national priorities on climate resilience and food security at the local plan level, including a stronger steer to avoid the unnecessary loss of best and most versatile agricultural land.
- State that meaningful community involvement is integral to plan quality and legitimacy, not simply a procedural add-on.

Finally, we note that Policy PM2 (2) sets the expectation that Local Plans are prepared and adopted within 30 months. As we touch on elsewhere within this consultation response, this is a very ambitious timeframe and, set against local government reorganisation and the introduction of SDSs, it gives us real concern about the confusion and uncertainty this will create and the likelihood that it will be exploited through increased speculative development.

#### 10. Do you think that local plans should cover a period of at least 15 years from the point of adoption of the plan?

Yes.

A minimum 15-year plan period provides a more stable framework for communities and investors, aligns better with the long lead-in times for strategic infrastructure and nature recovery, and reduces the likelihood of continual plan churn.

#### 11. Do you agree with the principles set out in policy PM6(1c), including its provisions for preventing duplication of national decision-making policies?

Partly agree.

Whilst we agree that PM6(1)(c) should stop pointless repetition and help keep local plans concise, it must not be used to narrow the proper scope of local plan-making or to prevent legitimate local variation. The policy should make explicit that local plans and neighbourhood plans can go further than national decision-making policies where justified by local evidence and circumstances, and that a policy should only be treated as “duplicative” where it adds no local specificity, no higher standard, and no practical implementation detail beyond the national wording.

Overall, whilst we understand the intention to avoid a separate statutory policy layer by setting national decision-making policy within the Framework, the key test is scope and effect: these policies must remain tightly limited to matters where England-wide consistency is genuinely needed, and must not be used to centralise decision-making or override locally-made policies on inherently place-based issues such as landscape character, locally specific environmental constraints, design quality, and locally evidenced approaches to climate resilience, biodiversity and green infrastructure.

We make recommendations about specific sub-paragraphs within draft policy PM6 below.

- 1c There is no need to duplicate or substantively restate national policies, but it will, be necessary to explain how some national policies impact on specific sub-regional areas.
- 1d This is a hugely important requirement, but it lacks specificity, and CPRE recommends clearer guidance on community involvement in planning should be provided. The Regional Spatial Strategies required that there was 60% local authority representation on the regional

assemblies and that 40% of the stakeholders were social, economic and environmental partners (SEEPs). This criteria applied on the main assemblies and on all subgroupings and worked extremely well. It ensured that all key populations were represented and resulted in balanced outcomes.

- 1e Strategic environmental assessments ought to be a legal requirement if SDSs are to be more than economic growth platforms. They must set a balanced over-arching framework which demands equal emphasis on economic, environmental, and social issues.
- 1f We strongly agree with this requirement.

## 12. Do you agree with the approach to initiating plan-making in PM7?

Partly agree.

CPRE strongly support the need for blanket local plan coverage delivered as quickly as possible and therefore support PM7's intent to initiate plan-making earlier and more clearly. However, we believe there needs to be a greater focus within the policy text on a need to actively make the process open and accessible to communities from the outset.

Most significantly however, Government needs to be alert to the short-term disruption created by local government reorganisation and the move to the new plan-making system. This means avoiding overly punitive consequences to local communities where delay is clearly outside an authority's control. Again, proper resourcing for LPA's must be provided from the outset or else they are simply being set up to fail.

## 13. Do you agree with the approach to the preparation of plan evidence set out in policy PM8? Partly agree

We agree with the direction of PM8(1) that plan evidence should be relevant, proportionate, up to date and focused on what is necessary to support sound choices. However, currently it is the case that the evidence base and supporting documents for plans have become unnecessarily long, technical and repetitive, with consultants often re-using standard text across multiple authorities and coming to vague, non-committal conclusions (if any conclusions are made at all). Much of this unnecessary padding serves little purpose other than to make the process harder for the public to engage with.

We recommend that PM8 should require, from the outset, a clear accessibility and engagement approach, including plain-language summaries of the key choices and trade-offs, proportionate evidence that focuses on what is genuinely necessary for soundness, and transparent presentation of what has changed and why as the plan evolves. It also should therefore place a clearer expectation on accessibility, including short plain-language summaries that explain what the evidence actually means for the plan's main options, trade-offs and constraints.

With respect to PM8(2)(c), whilst we agree in principle, as per our comments under question 15 there is a real risk of repeating the practical failures of the old duty to co-operate. Government should therefore provide firm guidance on what joint evidence must cover, how it will be governed, how disagreements will be resolved, and how data will be shared in practice. We can see the benefit of PM8(2)(d) where national approaches reduce waste and improve consistency, but it must not become a centralising tool that narrows legitimate local judgement or limits locally justified ambition.

Finally, PM8(2)(e) and PM8(3) is helpful in reinforcing that evidence should not be constantly re-opened, but it should also explicitly recognise that there will be occasions where evidence must be revisited where genuinely new, material information emerges or circumstances change, so that efficiency does not come at the expense of soundness or public confidence.

CPRE recommends the following wording should be added in the final policy PM8:

- Assumptions made in preparing the SDS should be shown to be reasonable and justified.
- Stakeholders, including local communities and hard to reach groups, are key providers of local information and should be engaged early in SDS preparation.' Evidence collection should include their participation and consultation with a statement as to how this has influenced the plan.
- Strategic environmental assessment should be used to provide a clear audit trail showing how and why the preferred approach was arrived at and where a balance had to be struck in taking decisions between competing alternatives. Where sustainability considerations informed the content of the SDS should be explicit.

#### 14. Do you agree with the approach to identifying land for development in PM9?

Partly disagree.

In principle, we support a clear and systematic approach to identifying land for development, but PM9 does not yet grapple with the practical reality of how land supply is currently assembled. In many areas the process is essentially a developer-led process whereby promoters tend to bring forward the most profitable and lowest-risk options, which often means large greenfield sites. Brownfield land, by contrast, may be more complex and costly to deliver, and as a brownfield site where the policy presumption is already likely to favour a grant of permission, there is little incentive for developers to spend time and money promoting such through allocation. The result is that currently land identification all too often just becomes a lazy reflection of whatever has been offered up by land promoters via the call for sites process, rather than a genuinely plan-led exercise rooted in place-making, regeneration, infrastructure and environmental limits.

PM9 should therefore place a much clearer expectation on local planning authorities to lead the process, including actively identifying and assembling brownfield and regeneration opportunities, using public land where available, and being explicit about how a brownfield-first strategy has shaped the site selection process. The policy should also be clearer that environmental limits and long-term resilience must shape choices from the outset, including avoiding unnecessary loss of best and most versatile agricultural land in the interests of food security, and ensuring that the mitigation hierarchy and nature recovery priorities are reflected in site selection rather than simply be delegated to a later problem as a mitigation issue as is often the case now.

This, in turn, requires Government to match expectations with proper resourcing and skills capacity so councils can do the upfront work rather than defaulting to whichever promoted sites are easiest to evidence. In that respect, we would welcome a meaningful proportion of the recently announced National Housing Delivery Fund and National Housing Bank be ringfenced for the front-loaded, council-led capacity, site assessment, land assembly and remediation work needed to bring forward brownfield and regeneration sites

Overall, PM9 needs to shift from “what is promoted” to “what is planned”, so that local plans are built around the right sites for sustainable place-making, not simply the sites that maximise developer return.

### **15. Do you agree with the policies on maintaining and demonstrating cross-boundary cooperation set out in policy PM10 and policy PM11?**

Partly agree.

The current duty to co-operate has been a complete failure in practice, too often reduced to a tick-box exercise that does little to practically address actual cross-boundary issues. On that basis, we have little confidence that a like-for-like replacement will ever deliver the joined-up planning needed to secure strategic infrastructure, particularly where difficult decisions are delayed or pushed from one authority to another.

Therefore, the key to making PM10 and PM11 work will be clear integration with SDS's so that strategic cooperation is genuinely anchored in SDS governance, evidence and agreed outcomes. We are however concerned that the current drafting is not clear how PM10/PM11 will operate where an SDS exists, how local plans can rely on it, or what happens where an SDS is absent or out of date.

16. Do you agree that policy PM12 increases certainty at plan-making stage regarding the contributions expected from development proposals?

Partly agree

We support the principle of PM12 in seeking to set a clear clearer expectation at the plan-making stage as to the level of developer contributions expected. We also support the principle that requirements should be clear enough to be reflected in land values, and that affordable housing requirements should be expressed with sufficient clarity to reduce scope for later dispute. It is however our view that overall, this could be best achieved through the introduction a land charge or via a simplified CIL regime.

We also support the proposal to express affordable housing requirements as a single figure rather than a range. Our study of strategic housing market assessments in rural areas [1] found that it was widespread practice in rural authorities to set ranges, which makes it more difficult for community groups and others to hold local authorities accountable for whether affordable housing targets are being met.

As it stands, in our view PM12(1) is unclear on what should be set at SDS level versus what should be set through local plans, and clearer guidance will be needed to avoid duplication, gaps and inconsistent expectations across strategy areas.

What however concerns are the most is that the current wording will do nothing but exacerbate what we already see where the concept of “deliverability” being used to pull requirements down to the lowest level that keeps schemes attractive to the market. A scheme is always more “deliverable” if infrastructure, mitigation and affordable housing expectations are reduced, but that simply shifts costs and impacts onto communities and undermines plan-led outcomes.

PM12 should therefore make explicit that contribution requirements must be driven first by what is necessary to make development acceptable and to deliver the plan’s place-making, infrastructure and environmental objectives, with viability used to test realism and inform delivery mechanisms (phasing, prioritisation and review), not as a default route to dilute essential requirements.

[1] <https://www.cpre.org.uk/resources/update-on-housing-needs-assessment/>

17. Do you agree that plans should set out the circumstances in which review mechanisms will be used, or should national policy set clearer expectations?

Partly agree.

We agree that plans should set out clearly when review mechanisms will be used, because that gives communities and applicants more certainty and reduces the scope for late-stage, ad-hoc renegotiation.

However, national policy also needs to set clearer minimum expectations, so reviews are applied consistently.

It is also our view that PM12(4) should be tightened so that where review mechanisms are required, they are explicitly expected to operate both ways i.e. the policy and any supporting guidance should make clear that reviews must secure additional affordable housing and infrastructure contributions where viability improves (for example because values rise, sales rates improve, or abnormal costs reduce), not just provide a route to reduce obligations where costs increase. The policy should be supported by clear national guidance on transparency, including an open-book approach and consistent reporting of inputs and outcomes, while allowing local plans to set the triggers, timing and priorities for reviews so they reflect local infrastructure needs and place-making objectives.

#### **18. Do you agree with policy PM13 on setting local standards, including the proposal to commence s.43 of the Deregulation Act 2015?**

Strongly disagree

We strongly oppose the removal of the scope of local authorities to set qualitative standards for energy efficiency and generation in new development. We recommend that the government restores the current NPPF wording in the final version.

It is CPRE's firm belief that councils should retain scope to go further where a clear local case is made and where higher standards are necessary to deliver genuinely sustainable development. For example, preventing local plans from setting higher standards energy efficiency standards for residential development risks weakening local ability to respond to the climate emergency. Likewise, there are already a number of plans where a higher than mandatory level of BNG has been evidenced and agreed. To now retrospectively remove the ability of councils to do this would be a backward step, undermining locally evidenced policy-making, penalising authorities that have taken an ambitious planned approach, and risking a race to the lowest common denominator at precisely the time higher standards are needed.

Overall, it remains our view that national standards should operate as a floor not a ceiling.

#### **19. Do you agree that the tests of soundness set out in policies PM14 and PM15 will allow for a proportionate assessment of spatial development strategies, local plans and minerals and waste plans at examination?**

Partly disagree

We support proportionate examinations, but we continue to remain concerned about the test focusing on an "appropriate strategy" rather than the "most appropriate strategy".

Whilst we recognise that this change was introduced in previous versions of the Framework, our members now have direct experience of this lowering the plan making bar in the real world. This is because an “appropriate” strategy can too easily become one that is politically convenient or easiest to deliver, rather than the best option when reasonable alternatives and environmental and land-use constraints are properly tested. That risk is most acute for local plans, where the key issues are spatial strategy and site selection.

If the tests are to be proportionate but robust, they should make clear that “appropriate” still requires transparent consideration of reasonable alternatives and clear justification of choices against achieving sustainable development. For SDSs, examinations should remain focused on genuinely strategic matters and local plans should not be required to re-run issues already settled in an up-to-date SDS.

Regarding the specific soundness tests, CPRE makes the following recommendations:

- a. Positive – The social and environmental, as well as the economic, needs of the area should be addressed. Health should be specifically mentioned. The Planning and Infrastructure Act 2025, Section 12G 2b requires that SDS *‘must have regard to the effect which the proposed spatial development strategy would have on the health of persons, and health inequalities between persons, living in the strategy area.* Effective joint working on cross-boundary strategic issues should include unmet requirements from neighbouring authorities, where reasonable and consistent with achieving sustainable development.
- b. Appropriate – The chosen alternative should be justified. The SDS must be based on robust and credible evidence. An SEA is essential for showing how different scenarios, that the SDS could have chosen, perform. There should be evidence of early participation of the local community, a key component of vision led planning in policy TR1. Local communities have a wealth of knowledge and their engagement in place-making is essential to ensure their support of proposed development. Other plans that the SDS is required to consider may constrain sustainable development. None of those referenced have been tested for their sustainability. Government guidance on preparing Local Growth Plans does not include testing their sustainability, yet they are considered to be *‘the guiding star’* that provides strategic direction for other relevant plans and strategies.

- c. Effective – There should be coherence with the strategies of neighbouring authorities. Post-adoption monitoring ‘in certain circumstances’ does not accord with PM1/2i which requires SDS implementation to be monitored. Vision and validate planning always requires post adoption monitoring against objectives with quantifiable targets.
- d. Consistent – This assumes that national decision-making policies would lead to sustainable development. Some would not in CPRE’s view, unless implementation substantially improves from recent experience. For example, S5 ‘Principle of development outside settlements,’ uses 1a, b, e, h and j, are all unsustainable and contravene DP3, TR1, TR3, TR4, L2, E3 and CC2. They are likely, based on recent experience, to lead to sprawling car and lorry-based development, with loss of essential agricultural land, failure to build on brownfield first, congestion on country lanes, and increased climate emissions and pollution.

**20. Do you have any specific comments on the content of the plan-making chapter which are not already captured by the other questions in this section?**

Yes, CPRE strongly supports the introductory box text in Chapter 2. It hopes to see more development applications brought forward in line with local plans. Local plans should not be too easily rendered out of date, as has been the experience since the introduction of the NPPF in 2012. A five-year housing land supply should not be undermined as developers argue land with extant permission out of the land supply to promote their own land interests. Furthermore, the calculation of the housing requirement should be based on local surveys of need and the capacity of the existing stock to meet that need. a The current stock-based standard method with an affordability calculation, in our view excessively inflates the amount of land required for housebuilding, which in turn has consequences for both the feasibility of plan-making and for sustainable development more widely. Policy S5: Principle of Development Outside Settlements is a particularly problematic policy as it completely undermines a plan-led approach to development. Draft policy 1j. encourages speculative development through an attack on the local plan-led system. Rather than leading to more houses, faster, in the right places it will result in vexatious appeals and clog up the decision-making function of local authorities as they seek to defend their up-to-date adopted local plans. See answer to qu.36.

### 3. Decision-making Policies

#### 21. Do you agree with the principles set out in policy DM1?

Strongly disagree

DM1 requires only major development applications to be accompanied by an appropriate level of information. CPRE recommends that it is extended to medium and minor development too, as all development applications should balance the economic, social and environmental factors to constitute sustainable development, which at the very high level is defined in draft NPPF, 2025 introduction paragraph 15, as “sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.” Obviously, the level of information should be appropriate to the scale of the site or complexity of issues.

Government should take each opportunity from every new development to contribute to good placemaking, especially in rural areas. The application needs enough necessary supporting information, which must be accurate and read against stated local plan policy, and material considerations to check whether in principle development is acceptable and able to be consented.

We are also concerned by the lack of clear standards or expectations on the quality of pre-application engagement and recommend that this is addressed through additional policies setting minimum standards.

#### 22. Do you agree with the policy DM2 on information requirements for planning applications?

Partly agree

CPRE supports a consistent and proportionate approach to information required to be provided by applicants as set out in DM2. Local validation lists are to include the specified information in the relevant national decision-making policies (summarised in Annex C). This includes information under DM1, viability, town centres, telecommunications, renewable and low carbon energy generation, transport, sports, open space and recreation, ground conditions, flood risk, sustainable drainage and heritage, but no reference to Local Nature Recovery Strategies and the 30-year monitoring nor to carbon assessment of development, so decision makers understand the lifetime climate impacts. DM2 should be rectified to include details for resolving the nature and climate crisis, which are linked.

CPRE agrees in principle with a proportional information requirement at the major, medium, and minor scales. However, we would raise issues with the integrity of the information provided by applicants and calls for the accuracy and quality to improve. Often applications are accompanied with excessive and impenetrable documentation but are sadly littered with data errors, or at worse they misrepresent the reality, and this causes a general distrust of developers. We recommend that DM2 should explicitly refer to the need for accurate information in support of development applications.

### 23. Do you have any views on whether such a policy could be better implemented through regulations?

Yes. CPRE would favour a regulatory approach as this would require clearer definitions as well as supporting guidance.

### 24. Do you agree with the principles set out in DM3?

Partly agree

CPRE agrees that development proposals should generally not be refused where the proposal is in line with the development plan. This means delivering the required contributions for matters such as affordable homes and nature recovery. However, where applications are not in line with the development plan and does not deliver required contributions, they should be refused. CPRE is concerned that advice from statutory or internal consultees should be provided where it is needed. We do not believe that statutory consultees are a significant block on processing applications through the system, contrary to the arguments made by some. The government's own planning application statistics show that since the period 2009-10 up to the quarter ending September 2025, the gap between applications submitted, decided, and granted has narrowed considerably. [1]

The planning pipeline has many stages in the process and often delays arise due to the actions of developers, such as making revisions and Section 106 agreements. Please see 'Timelining the Pipeline' Housing Development End to End by the University of Reading and Lyon CTP, November 2025 [2].

Planning policy should specify development proposals should comply with specified developer contributions and obligations as stated in adopted local plans, and as a default minimum NPPF policies.

[1] <https://www.gov.uk/government/statistics/planning-applications-in-england-july-to-september-2025/planning-applications-in-england-july-to-september-2025-statistical-release#F1>

[2] <https://www.cpre.org.uk/resources/timelining-the-pipeline-housing-development-end-to-end/>

25. Do you agree that policy DM5 would prevent unnecessary negotiation of developer contributions, whilst also providing sufficient flexibility for development to proceed?

Strongly disagree

CPRE is pleased that the MHCLG recognises in DM5 1) that development proposals that accord with local plan policy are assumed viable, but we are concerned by the proposals to allow non-compliance with required contributions in some circumstances. Also, there is still scope for developers to avoid policy requirements in many cases by simply submitting a fresh application for the same site, and pleading that circumstances have changed. This allows too much scope for developers to avoid agreed contributions, which perversely has become the norm over the past two decades. The housing crisis has in part been caused by the poor outcomes when no affordable homes are built. So, as it stands, CPRE strongly disagrees with the policy DM5.

CPRE welcomes DM5 3), which says “Neither the price paid for land, nor the price intended to be paid through an option agreement, should be a justification for failing to accord with relevant policies in the plan.” However, the suggested use of review mechanisms in section 6 is likely to be difficult for many rural local authorities who will lack the resources and access to expertise of London boroughs that have pioneered the use of them. CPRE recommends that further advice and support should be provided through the Planning Advisory Service to help such authorities.

The matter of whether a development is viable should be attributed weight accordingly. Unviable proposals should be refused. Importantly, when planning consent is granted, it should be assumed that the viability remains for a period of at least five-years, otherwise local authorities are burdened with renegotiations. This has a negative impact on the ability of local authorities to defend a five-year housing land supply. Bearing in mind most planning departments are chronically underfunded and operating at over capacity, it is unhelpful to the purpose of streamlining the decision-making process to gum up the process with viability claims. What’s more it is galling that large developers record bumper profits at the same time as claiming they cannot afford to build affordable homes, as recorded by research of Sheffield Hallam University, October 2023. [1]

See also our comments under the later Annex B specifically on viability.

[1] <https://www.shu.ac.uk/centre-regional-economic-social-research/publications/the-invisible-hand-that-keeps-on-taking>

26. Do you have any further comments on the likely impact of policy DM5: Development viability?

The planning system cannot entirely de-risk the process of building homes, which on the balance sheets of the largest housing developers is evidenced as paying handsomely, overall. Please see the research of Sheffield Hallam University, October 2023. [1]

In any case the Planning Practice guidance already guarantees a developer profit margin of between 15- 20% which is already high. Viability Assessments are intended to aid transparency, but due to commercial sensitivity only the executive summary of such documents is available for public scrutiny. There is frustration when developer profits increased at the same time developer contributions declined, particularly affordable home delivery, showing a clear dysfunction of the system.

In general, developers of major schemes of more than 50 homes should not be allowed consent if the proposal is not viable with requirements in local plans and NPPF policy. Only in exceptional circumstances, should developers be allowed to submit viability assessment, due to unforeseen issues, but on the grounds of permission sought from the decision-taker.

The planning system needs to monitor claimed 'benefits' in development applications more closely to ensure they are realised including number of affordable homes, including social rented tenure, the actual number of jobs created, biodiversity net gains, landscape improvements, and so on. The outcomes on the ground of development must be much improved in the future. There are estimated to be some 1.5 million homes in unimplemented planning consents, and these should be built out.

See also our comments under the later Annex B specifically on viability.

[1] <https://www.shu.ac.uk/centre-regional-economic-social-research/publications/the-invisible-hand-that-keeps-on-taking>

## 27. Do you have any views on how the process of modifying planning obligations under S106A, where needed once a section 106 agreement has been entered into, could be improved?

CPRE has considered the planning pipeline and there are many stages in the process when the ball is in the developer's court as opposed to being in that of the local authority or statutory stakeholder. Please see 'Timelining the Pipeline' Housing Development End to End by the University of Reading and Lyon CTP, November 2025. [1]

Developers who revise their proposals part way through the decision process add a considerable time delay, particularly when the number of homes are increased, as advice from stakeholders need to be amended accordingly.

Agreeing Section 106A can be a stage where delay is caused by developer's own lawyers taking time to agree terms.

Planning policy should specify development proposals should comply with specified developer contributions and obligations as stated in adopted local plans, and as a default minimum NPPF

policies. Due to upfront costs, however, we recognise that it might make sense to draw on agreements and obligation part way through the development to allow for cashflow.

[1] <https://www.cpre.org.uk/resources/timelining-the-pipeline-housing-development-end-to-end/>

**28. Do you have any views on how the process of modifying planning obligations could be improved in advance of any legislative change, noting the government's commitment to boosting the supply of affordable housing.**

CPRE and the Federation of Master Builders came together to set out how to achieve diversification of the market to deliver more homes. The top three reported causes of delay in the planning process were identified as: 1. Inadequate resourcing of planning departments, 2. Inadequate communication by planning officers. and 3. The signing off on planning conditions. A recommendation was to review the use of viability assessments by housebuilders to ensure that commitments to build more affordable and social housing cannot be watered down, including by tightening up Section 106 rules.

[1]

Without prejudice, if developers seek not to build agree affordable homes, they should pay into a central pot for small and medium sized builders to enable registered providers to build them. And environmental groups to deliver enhancements against Local Nature Recovery Strategies should be encouraged. However, for both, a key issue is the identification of land to build affordable homes and deliver biodiversity net gain, which needs to be addressed by the planning rules.

The Community Infrastructure Levy was originally intended to standardise payments for developer contributions and obligations but has not been introduced in some areas as markets were not as buoyant as others. A charge on the percentage of the final property sale price might be a way around this.

[1] <https://www.cpre.org.uk/wp-content/uploads/2024/09/CPRE-x-FMB-final.pdf>

**If so, please provide views on the current use of s73 and, if any, the impact on affordable housing obligations.**

Section 73 of the Town and Country Planning Act 1990 allows an applicant to apply to vary or remove conditions attached to an existing planning permission without altering the original development description. This should not be encouraged in policy, or poor outcomes are achieved on the ground.

**29. Do you agree with the approach for planning conditions and obligations set out in policy DM6, especially the use of model conditions and obligations?**

Partly agree

The text does not appear to have substantially changed since the NPPF, 2024 version. Planning conditions are a standard practice to avoid and reduce harms particularly at construction, operational and decommissioning stage. There will be some types of development, where the land should revert to the original use, and in such cases, where it is agricultural there are issues of soil storage and management where a condition can secure land being returned in a better state, consistent with the Environment Act 2021. Model conditions may help in this regard.

**30. Do you agree that policy DM7 clarifies the relationship between planning decisions and other regulatory regimes?**

Partly agree

CPRE agrees that the planning system should decide on whether land use is acceptable or not. However, there are many cases where a separate regulatory regime should control processes or emissions. Due to chronic underfunding for decades, many regulators, including the Environment Agency, and Natural England have been unable to issue advice or required environmental permits to give assurance that impacts arising would be adequately controlled.

This was experienced when Cuadrilla sought to explore the shale rock strata via hydraulic fracturing, commonly referred to as ‘fracking’. This was in the Fylde area of Lancashire, where the Bowland Shale is highly faulted, and fracking led to seismic events, even at low volumes of frack fluid (technically not fracking as defined by volume), but proven as totally unviable and the licence was handed back. The planning consent for the Development Consent Order was granted in the knowledge the regulatory regime was problematic. Even so, both the Environment Agency and the Oil and Gas Authority gave, at the time spurious assurances, that frack fluid could not contaminate water sources and that the process would be monitored in real time. Neither were true, as the faulted geology meant the Manchester Marl could not prevent contaminated frack fluid from reaching receptors and the monitoring equipment was technically unable to provide data in real-time, not least as the data was shared with a three-week delay, and no one knew the extent of fissures or the precise location of the drill head.

Based on this, and other examples of planning decisions involving environmental permitting, CPRE thinks there needs to be a more joined-up approach to decisions between planning decision-making and environmental regulation. Regulators need adequate funding like planning departments to function properly. There needs to be conditions to say planning consent is given on the basis that

necessary permits are in place before there is a start on site. Otherwise, unlawful outcomes could be promoted.

### 31. Do you agree with the new intentional unauthorised development policy in policy DM8?

Partly disagree

CPRE welcomes subsection 2 of draft policy DM8.

Intentional unauthorised development is the anthesis of good town and country planning. DM8 should more forcefully guard against it than the text currently does. 1) whether a local planning authority responds in an expedient, depends on the resourcing of the team. Sadly, following austerity measures local planning teams are now operating over capacity, linked also to the volume of appeals, and frequent changes to national planning policy requiring re-drafting of local plan policy to keep it up to date. Enforcement teams are usually operating over capacity. Breaches of planning must be taken seriously and not easily rendered as acceptable or it encourages poor practice and backdoor development, which is usually harmful.

On the whole landowners and developers behave well, but there are some interests, including in rural areas where building takes place without approval, causes an array of land use problems, such as road congestion and highway safety issues, adverse landscape and visual impacts, nuisance to neighbours and devastation to important habitats. CPRE calls for planning to keep everyone to the same rules. So, 2) should make retrospective planning permission acceptable only in exceptional circumstances, otherwise it will encourage intentional unauthorised development.

### 32. Are there any specific types of harm arising from intentional unauthorised development, and any specific impacts from the proposed policy, which we should consider?

Specific types of harms arise when developers build to an increased footprint or height contrary to specified consents. Loss of green infrastructure is a particular problem, including removal of peat mossland, felling of woodland, or trees (including those with Tree Protection Orders) and removal or damage of hedgerows considered 'Significant' (in the Hedgerow Regulations 1997) leading to substantial habitat damage. Issues of nighttime light pollution in otherwise dark skies is a particular problem, including from remote utility scale solar developments in remote areas.

Fines are not of a scale to discourage, given the high hope value of profits that can be gained. In accordance with the Environment Act 2021, environments should be protected from the date the Environment Bill was laid with Parliament, i.e. 30 January 2020.

CPRE highlights that planning enforcement is a central pillar to a functioning planning system.

Yet, due to capacity issues, it is often difficult for people to contact planning departments to notify them of enforcement issues. It is a more common occurrence than authorities may be aware due to the difficulty in reporting issues.

CPRE hopes planning reforms enable more enforcement officers to police the system to discourage and resolve expediently intentional unauthorised development.

### 33. Do you agree with the new Article 4 direction policy in policy DM10?

Strongly agree

CPRE is aware of many cases of where Article 4 directions are useful, such as removing permitted development rights in conservation areas, too many take away units in a row of shops, or controlling second homes in tourist hotspots, which inflates house prices, so local people who need homes can access affordable housing. CPRE recommend DM10 c) apply to the 'relevant' rather than 'smallest' area possible.

## 4. Achieving Sustainable Development

### 34. Do you agree with the proposed approach to setting a spatial strategy in development plans?

Partly disagree

CPRE supports the objective that development plans should plan positively for future growth, directing growth to the most appropriate and sustainable locations, supporting regeneration, and conserving and enhancing the built and natural environment. The problem is, when faced with impossible to meet housing requirements leading to widespread failure against housing supply/delivery tests, the lived reality of the planning system for much of country is the opposite of this supposed objective. That is, whilst the current and draft framework might talk about a spatial strategy that steers development away from inappropriate countryside locations, yet the practical effect of both is, and will be, to increase speculative pressure on greenfield land.

This is largely because many councils are currently being forced to adopt plans built around housing requirements that are never going to be realistically deliverable in market terms. These councils are then predictably failing the five-year supply and delivery test failure soon after adoption. This failure is not however a result of a flawed or unsound strategy, but because these councils were not able to plan against realistic delivery targets. Communities then face renewed speculative pressure on additional greenfield land, even where the plan-led choices were clear and recently agreed.

In that context, the wording of S1 is too rigid, because it does not give plan-makers enough scope to respond to real-world delivery conditions or to set a spatial strategy that is both ambitious and credible. Government should provide clearer guidance on how plans are expected to reconcile housing requirements with deliverability and with hard constraints, including those captured by footnote 23, so authorities are not set up to fail, and the plan-led system is not undermined on adoption.

Likewise, the approach to spatial strategy as set out within Policy S2 also reads too rigidly as a prescribed set of components, with little room for local variation. It is also the case that a spatial strategy will not always be best expressed through a simple settlement hierarchy alone i.e. depending on local geography it may be clearer and more effective to articulate an urban focus or other spatial concepts. The introductory box should reference a brownfield first approach.

### 35. Do you agree with the proposed definition of settlements in the glossary?

Partly disagree

We welcome the move in principle to focus new development within settlements and to provide a glossary definition of “settlements” to guide this policy. However, the proposed definition risks expanding “settlement” to include land that is not, in any meaningful sense, part of an existing built-

up area, simply because it is allocated or has planning permission. This is particularly concerning given CPRE is aware of allocations that have sat in local plans for many years, sometimes decades, without being built out, and it is now routine to see anticipated build-out rates stretching into the 2040s and beyond.

That would be a significant change in effect, and it creates a real risk of unsustainable isolated or satellite schemes in the countryside where they are visually and functionally separate from the main town or village and would ordinarily be regarded as open countryside. This is likely to increase, not reduce, speculative pressure on greenfield land by blurring the boundary between genuinely built-up areas and detached growth locations. This is because speculative land promoters will inevitably seek to rely on a combination of five-year supply failure and the strengthened presumption in policy S5 to justify additional countryside schemes, arguing that land is “within” a settlement simply because it is allocated or has permission, regardless of whether it is actually integrated with the existing built form.

CPRE recommends that:

- the definition of “settlement” should be tightened so that it is anchored in physical form and functional integration, with boundaries clearly defined and mapped through the development plan, subject to proper scrutiny and community involvement, rather than being expanded automatically by allocations or permissions.
- New Planning Practice Guidance is provided on how policy S4 is expected to operate in those districts they do not currently rigidly define settlement boundaries within their policy mapping.

### 36. Do you agree with the revised approach to the presumption in favour of sustainable development?

Partly disagree

CPRE supports the plan-led principle at the start of Policy S3 that where a proposal accords with an up-to-date plan, it should be approved without delay. Our concern is with how the revised presumption will operate in practice. The draft creates a new structure, differentiating between development within defined settlement boundaries, where approval is strongly encouraged, and development outside settlement boundaries, which is meant to be refused save for a limited set of exceptions through S4 and S5. In principle, that clearer distinction is welcome.

The problem is that Policy S5 then provides a major escape route for development outside settlements where it is said to meet an evidenced unmet need. For housing, that “unmet need” is effectively defined by whether an authority can demonstrate a five-year supply or meets the Housing Delivery Test threshold.

If Policy S3 is genuinely to be a presumption in favour of sustainable development, it must not allow market-led under-delivery to become a default justification for more countryside loss. The presumption

needs tighter safeguards around the S5 triggers, and far greater emphasis on bringing forward brownfield and regeneration and on delivering the right homes, not simply increasing permissions in the wrong places.

### 37. Do you agree to the proposed approach to development within settlements?

Partly agree

We strongly support:

- the proposed approach to directing development to suitable land within settlements; and
- the continued strong protection for areas of designated Local Green Space (S4/2.a.ii)

CPRE recommends that Policy S4 should directly embed an urban ‘brownfield first’ approach that is consistent with a genuinely plan-led system. This in turn reduces pressure on the countryside by focusing growth where services and infrastructure are most likely to be available. In that sense, the direction of travel is welcome.

We are concerned however that the draft policy may allow legitimate community concerns about design, character, heritage, amenity, green space, biodiversity and infrastructure capacity, to be overridden where these are not covered by the proposed wording of S4/2.a.

### 38. Do you agree to the proposed approach to development outside settlements?

Strongly disagree

CPRE supports a genuinely plan-led system in which the countryside is protected, and development is steered to the most sustainable locations, with the default position being that development outside settlements is refused unless there is a clearly evidenced, plan-led justification. We also support a properly controlled route for rural affordable housing outside settlements. Policy S5 however does not achieve this.

Whilst Policy S5 is framed as a more restrictive approach to development outside settlements, the reality is it does the opposite. It states that only certain forms of development should be approved outside settlements and that “These should be approved” unless benefits are “substantially outweighed” by adverse effects. This is a real tilt in favour of countryside development and, in the real-world context of widespread lack of five-year supply and failure of the Housing Delivery Test, will be used as a ready-made hook for speculative greenfield proposals. “Should be approved” should therefore be deleted, and the policy rewritten so that each category is subject to a clear, plan-led test

of need, location, alternatives, and impacts. It is also the case that the “adverse effects outweighing benefits” test is too vague. Without clearer direction, claimed benefits will continue to be overstated and harms underweighted, and the policy will operate as a ratchet towards countryside loss rather than a genuinely selective approach.

As it stands, the combination of this mandate to approve plus the wording of S5(1)(j) would in real terms create a near permanent presumption to approve speculative housing developments across much of rural England. This is because S5(1)(j) defines “unmet need” as where the LPA cannot demonstrate a five-year supply or scores below 75% in the Housing Delivery Test, even though those outcomes are often driven by market build-out rates rather than plan-making. This is made worse by the Government’s delayed and now erratic publication of the HDT, with Ministers reportedly intending to combine the 2024 and 2025 tests and publish later in 2026, leaving prolonged uncertainty about whether and when the presumption-style consequences are triggered.

Finally, and as set out in our Q40 comments, we support genuinely sustainable station-led growth in settlements in principle, but outside settlements the Policy should be more restrictive. Currently, S5(1)(h) and its footnote are a blunt and confusing mechanism that risks being gamed and represent a significant threat to rural England, which is strongly opposed; it would be better handled through plan-making and the settlements-led approach with clear, locally evidenced criteria.

The draft policy S5 is in CPRE’s view inconsistent with and contravenes DP3 key principles of design, TR1 the vision-led approach, TR3 locating development in sustainable locations, L2 making effective use of land, E3 freight and logistics, and TR4 and CC2 implementing sustainable travel. Uses 1 b, e and j are all unsustainable and would lead to sprawling car and lorry-based development, with loss of essential agricultural land, (and a subsequent decline in food security), failure to build on brownfield land first, congestion on country lanes, increased climate emissions and pollution, and reinforcement of car dependency. All such developments should be located where sustainable travel is a genuine choice.

It is unclear what weight of adverse effects would outweigh any benefits. The NPPF favours economic benefits at the expense of social and environmental harm which are given substantially less weight. The balance must be restored for development to be sustainable.

CPRE recommends the following changes to policy S5:

- Delete 1 b, e, and j.
- Amend 1 h and footnote 26 to additionally require sufficient existing or proposed passenger capacity on the rail network to service the level of development proposed; and that development should be physically well-related to **both** a railway station **and** an existing settlement within which the station is located.

- The weight of adverse effects that would outweigh the benefits of sustainable development must be defined.

### 39. Do you have any views on the specific categories of development which the policy would allow to take place outside settlements, and the associated criteria?

The categories and criteria in policy S5 are too broad, too permissive and too easily gamed. The starting point that qualifying proposals “should be approved” is inappropriate for development outside settlements and should be removed, with the policy reframed so that the burden of proof is on development proposers to show compliance with the development plan as well as the NPPF. Several of the categories also risk pulling in forms of development that, in practice, are likely to be unsustainable and in clear tension with the Framework’s wider direction on vision-led place-making, locating development in sustainable locations, making effective use of land, and delivering sustainable travel and climate outcomes. The concern is that this would encourage sprawling, car and lorry-based patterns of development, unnecessary loss of agricultural land, weaker brownfield-first outcomes, congestion on rural roads and lanes, higher emissions and pollution, and reinforcement of car dependency. Development of this nature should be directed to locations where sustainable travel is a genuine choice, not normalised in the countryside.

Policy S5(1)(j) will be relied on to justify greenfield edge and freestanding schemes outside settlements even where councils have allocated land and granted permissions. We also have concerns about S5(1)(h) (stations). While station-led development can be supported in principle where it is genuinely sustainable, the drafting is loose and confusing, creating scope for inconsistent interpretation and argument. We firmly believe that this would therefore be better handled through plan-making and a settlements-led approach rather than a standalone countryside approval route.

Overall, if any categories are retained, they should be narrowed substantially and subject to clear sequential tests, including robust brownfield-first and settlement-first requirements, protection for best and most versatile agricultural land, and a defined approach to weighing adverse effects so social and environmental harm is not routinely given insufficient weight.

### 40. Do you agree with the proposed approach to development around stations, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12?

Strongly disagree

Development at rail stations which are genuine public transport interchanges, i.e. represent a real multimodal interchange, does not in CPRE’s view need a separate policy. Public transport interchanges are covered by application of DP3e Key principles of design, TR1 (sustainable transport should be

considered from the earliest stages of plan making), TR1d and e, TR3 (sustainable locations), TR4 (provision of good quality waiting facilities), HC1 (planning for healthy communities), HC3 (public service infrastructure serving new development) and HC4 (new and improved public service infrastructure). Walking between home and the rail station should take no more than 15 minutes. Additional criteria are unhelpful and cannot cover the diversity of situations. The key factor is whether the station location is sustainable or can be made sustainable, which brings into play a whole raft of issues best addressed through vision and validate planning as in TR1 and through TR3. With these amendments we fully support development at rail stations.

S5,1h conflicts with policies DP3, L2, TR1, TR3, TR4 and CC2 all of which require locations that already offer a genuine choice of sustainable transport modes with opportunities for their improvement. Rail stations that meet the criteria of S5h and lie in the Green Belt would be determined using GB6, GB7 and GB8. Implementation of GB7,1fiii would erode and harm the Green Belt.

The criteria for a strong presumption in favour of development under S5h are confusing and inconsistent as follows.

- (a) **Distance from railway station** – Two definitions are given, development within a 15-minute walk of well-connected train or tram stations; physically well-related to a railway station or a settlement within which the station is located. The latter means the development could be located anywhere within the settlement and lead to car trips to the station. Commuters appear to be willing to walk further to rail stations than to bus stops. A maximum 15-minute walk should be the criterion as 24% of those living more than a 14-minute walk from a rail station use the car to get there<sup>1</sup>.
- (b) **Well-connected stations** – These are defined as within the top 60 Travel to Work Areas (TTWAs) by Gross Value Added (GVA) in England and ‘in the normal weekday timetable, are served (or have a reasonable prospect of being served due to planned upgrades or through agreement with the rail operator) throughout the daytime by four trains or trams per hour overall, or two trains or trams per hour in any one direction.’ Policy L3 advises a density of 40dph for a station, or 50dph at a ‘well-connected’ station, adding to the inconsistency as it appears to include all stations. The TTWAs data is 15 years out of date. The 2021 census was undertaken during the Covid crisis and does not record reliable travel to work data. Since 2011 there have been substantial shifts in working practices (e.g. to home working<sup>2</sup>) as well as substantial levels of housing, employment and infrastructure development which could all have had substantial influence on commuting patterns. The top 60 stations in terms of GVA account for around 40% of the 149 TTWAs in England. The policy may therefore miss sustainable and suitable sites adjacent to railway stations outside the top 60 TTWAs. As demonstrated by various authors<sup>3</sup> the policy is likely favour development in the south east and London commuter belt, but provide few opportunities for cities further in the midlands or north. Finally, TTWAs do not match local planning areas; coupled with local government reorganisation this criterion will complicate local plan preparation and decision making.

(c) **Train services**- Four trains or trams per hour overall, or two trains or trams per hour in any one direction, is insufficient. Many rail services are overcrowded and there is insufficient capacity on the track for more trains. This could result in passengers nearer the destination not being able to get on the train. Stations that have a reasonable prospect of being served due to planned upgrades or through agreement with the rail operator depend on rail operators who may not agree to upgraded frequencies until development is committed in those locations or may not agree at all. Upgrading frequencies may also depend on rail infrastructure improvements which, even if agreed, are notorious for delay and cancellation.

The land for development around railway stations is more likely to exist where it is outside settlement boundaries i.e. in a rural but also potentially unsustainable location. Just because the rural station meets the service definition it does not mean that a housing development adjacent to it will be sustainable in terms of access for other essential services. There are many rural stations at the far reaches of TTWA with the minimum required number of services of trains per hour but no other public transport or active travel access and hence no prospect of being a sustainable travel hub for new residents. Trains stopping at rural stations surrounded by countryside and best quality farmland are an easy way to access high quality nature and development around the station will compromise this. Development around rural stations has the potential to change commuting patterns, leading to more car dependency, not less. Research based on the 2011 census undertaken by the RTPI<sup>4</sup> found: ‘By using travel-to-work data from the 2011 Census, the Royal Town Planning Institute (RTPI) has found that building one million homes around railway stations in the Metropolitan green belt could result in between 3.96 and 7.45 million additional car journeys per week on roads which are already struggling with congestion and delays.’

The Glossary does not contain a definition of a public transport interchange or travel hub, yet the term is used several times in the NPPF text.

CPRE recommends that:

- S5,1h and footnote 26 be amended to additionally require sufficient existing or proposed passenger capacity on the rail network to service the level of development proposed; and that development should be physically well-related to **both** a railway station **and** an existing settlement within which the station is located.
- To TR3 add unambiguous criteria for what constitutes good connectivity for public transport– ‘400m from home to bus stop in urban well-served areas; 800m (10min walk) from home to bus stop in rural areas where bus services are less frequent; maximum 1200m (15min walk) from home to rail station.’
- Delete GB7,1fiii – ‘transport infrastructure is not inappropriate in the Green Belt’.

- To Annex B Glossary add a definition of a sustainable travel hub or interchange, as follows: ‘A travel interchange provides effective, inclusive and seamless connections between various modes including walking wheeling and cycling, and public and shared transport. They vary significantly in scale from a secure cycle lockup at a bus stop to a comprehensive set of multimodal options at strategic bus and railway stations. For all of them there should be safe attractive routes to walk wheel cycle to the hub, comprehensive travel information about the connecting modes, and shelter from the weather.’

#### 41. Do you agree that neighbourhood plans should contain allocations to meet their identified housing requirement in order to qualify for this policy?

Partly disagree

Neighbourhood plans form part of the statutory development plan and represent a now well-established expression of local democracy. Further, their role and importance in this regard is only going to increase as local government reform sees much of the country move much larger unitary councils and SDS's.

CPRE believes that protection against inappropriate development should apply where a proposal conflicts with a made neighbourhood plan, regardless of whether the plan includes site allocations to meet an identified housing requirement. We therefore strongly disagree with the inclusion of criteria 1(b) which requires a Neighbourhood Plan to provide housing allocations to meet overall requirements as a condition of protection. To us, this policy will effectively serve to penalise communities that have produced neighbourhood plans that are informed at the most local of levels on design, local character, green space and infrastructure. Is also not alive to the fact that for many Neighbourhood plans, allocations are not feasible or even necessary where they are working in conformity with an emerging or adopted local plan. To include criteria 1(b) would therefore weaken confidence in neighbourhood planning, particularly for such communities. If Government wants to encourage allocations, that should be supported through resourcing and guidance, not by removing weight from neighbourhood plans that have been properly prepared and examined.

CPRE recommends that the draft policy S6/1b is deleted and the current NPPF14(b) wording retained which provides for greater flexibility in bringing forward neighbourhood plans, as housing requirements can be met through encouraging brownfield windfalls as well as specific site allocations.

## 5. Meeting the challenge of climate change

### 42. Do you agree with the approach to planning for climate change in policy CC1?

Partly disagree.

In our response to the last NPPF consultation we drew attention to the legal requirement to demonstrate that development plans contribute to the mitigation of, and adaptation to, climate change. CPRE research in 2022 [1] found that in practice this is considered insufficiently, and often not at all, during plan preparation and examination.

CPRE recommends that national planning policy (through the NPPF) should introduce a standardised approach to carbon counting for local plans. It is a legal requirement for all local authorities and the government to meet carbon budgets and this must be considered when proposing any policies relating to land-use and built development. All local plans must be prepared and adopted in line with national carbon budgets, and therefore, any updates to national policy should also align with this requirement.

We therefore welcome the recognition that ‘the role of baseline carbon assessments as tools that can be used to assess the potential impact of spatial strategies and allocations on future emissions and options for mitigation’ but this should be made mandatory and also explicitly linked to the meeting of national carbon budgets. CPRE recommends the following amended text below for CC1 1a:

*a. Proposing development patterns through their spatial strategy and allocations which:*

*i. will deliver radical reductions in greenhouse gas emissions (which should be informed by an assessment of baseline carbon emissions and the potential effect of development options on future emissions and their mitigation) corresponding to national carbon budgets; and [...]*

The NPPF text should require plans and policies to explicitly reduce GHG emissions along the same trajectory as that required for the UK carbon budgets according to the Climate Change Committee. All spatial plans should assess the impact of policy and allocations on the carbon reduction trajectory and spatial and transport planning must be fully integrated.

The reasons for change are that development patterns in spatial plans should contribute to radical reductions in greenhouse gas emissions. In March 2025, the domestic transport sector remains the largest emitting sector, accounting for 30% of all emissions [1] and has contributed little to reductions in those emissions over the last 30 years. In 2023, 25% of trips were under 1 mile, and 71% under 5 miles. Walking was the most frequent mode used for short trips: 81% of trips under one mile were walks in 2023. However, for all other distance bands, the car was the most frequent mode of travel [3]. There is therefore an urgent need to both reduce climate emissions from the transport sector

and to ensure development locations are sustainable and make active travel and public transport the first choice for all journeys. This requires effective vision-led planning.

Also, the Future Homes Standard to require most homes and buildings to install energy efficient measures is necessary to complement NPPF policy. It is a missed opportunity that homes and buildings are not required to have solar panels installed as standard. This helps to reduce energy costs and reduces greenhouse gas emissions, and this is already required in other countries as evidenced in the CPRE Lighting the way report [4].

[1] CPRE (March 2022). *Climate emergency: time for planning to get on the case*, available from [www.cpre.org.uk](http://www.cpre.org.uk)

[2] <https://assets.publishing.service.gov.uk/media/67e4060df356a2dc0e39b4cd/2024-provisional-greenhouse-gas-emissions-statistics-statistical-release.pdf>

[3] NTS 2023: Mode share and multimodal trips, updated April 2025, DfT.

<https://www.gov.uk/government/statistics/national-travel-survey-2023/nts-2023-mode-share-and-multi-modal-trips>

[4] <https://www.cpre.org.uk/wp-content/uploads/2024/04/CPRE-Report-Lighting-the-way-final-version.pdf>

### 43. Do you agree with the approach to mitigating climate change through planning decisions in policy CC2?

Partly disagree.

In the last NPPF consultation (2024) we recommended that all planning applications for major development should be accompanied by an assessment of the carbon lifecycle of the project considering construction and operational stage, with a per annum carbon figure so decision takers can understand the carbon impact – particularly embodied carbon- of development proposals. We still believe this approach is required as an additional measure that would help deliver carbon reductions. This could be introduced in CC2 at two points – see recommended amendments below.

CPRE recommends the following amended text for CC2 1c:

c. Use design approaches which conserve energy and other resources in accordance with policy DP3(1)(c); give substantial weight to design approaches which significantly reduce embodied carbon in proposed development(s)

Whilst we support text at CC2 1f regarding the importance of both creating and protecting carbon stores, it ignores the large amounts of carbon locked up in peaty soils outside of natural habitats, e.g. on farmland. New mapping by Natural England now defines peaty soils as having at least 30cm of peat [1].

CPRE recommends the following amended text for CC2 1f:

f. Contribute [...] while avoiding harm to peaty soils and habitats which can act as important carbon stores, including peatland and salt marsh; and

CPRE recommends the following amended text for CC2 2:

2. Substantial weight should be given to the benefits of improving the energy efficiency and embodied carbon of existing buildings and/or drawing energy from [...]

In addition, in relation to CC2 1e, CPRE recommends that the encouragement to use energy from decentralised networks should be upgraded to become a requirement, with a threshold % (we suggest a minimum of 20%) akin to the ground-breaking 'Merton Rule'. Without a target-driven approach (and the level of requirement would require further refinement) the currently proposed policy suffers the risk of a 'chicken or egg' scenario, with very little opportunity for successful, widespread implementation.

Finally, CPRE recommends that a 'carrot and stick' approach would enhance policy at CC2 2. We suggest adding text as follows: '[...] from permitted development rights). Developments that do not provide significant benefits in terms of energy efficiency and local, low carbon energy supply should normally be refused.'

As mentioned in answer to question 42, In 2023, 25% of trips were under 1 mile, and 71% under 5 miles. Walking was the most frequent mode used for short trips: 81% of trips under one mile were walks in 2023. However, or all other distance bands, the car was the most frequent mode of travel [2]. In order to reduce climate emissions from the transport sector, development locations must be sustainable and make active travel and public transport the first choice for all journeys. This requires effective vision-led planning, which urgently requires national guidance from the government.

[1] <https://publications.naturalengland.org.uk/publication/5075614867128320>

[2] NTS 2023: Mode share and multimodal trips, updated April 2025, DfT.

<https://www.gov.uk/government/statistics/national-travel-survey-2023/nts-2023-mode-share-and-multi-modal-trips>

#### 44. Do you agree with the approach to climate change adaptation through planning decisions in policy CC3?

Partly agree

- (a) CPRE welcomes that the policy on climate change adaptation goes beyond the current policy, considering current and future climate impacts.

Wildfires are increasing due to extended periods of drought and poor upland management practices. Slowing the flow and rewetting uplands will help reduce the risk of wildfires in a helpful way and the NPPF should support best land management practice.

**45. Does the policy on wildfire adaptation clearly explain when such risks should be considered and how these risks should be mitigated?**

Partly disagree.

**a) Please provide your reasons**

Wildfires are increasing due to extended periods of drought and poor upland management practices. Slowing the flow and rewetting uplands will help reduce the risk of wildfires in a helpful way. Draft policy CC3 relies solely on development proposals coming forward. CPRE recommends that the final NPPF should encourage policies in SDS that support best land management practice, which may or may not be connected with new development coming forward through the planning system.

**46. How should wildfire adaptation measures be integrated with wider principles for good design, and what additional guidance would be helpful?**

No comment.

**47. Do you have any other comments on actions that could be taken through national planning policy to address climate change?**

The planning system should link national, regional, local policies to deliver carbon emission reductions commensurate with UK carbon budgets. Whilst encouragement (see CC1) for baseline carbon assessments is very welcome (and should instead be a requirement, see our comments above), if there is no target/data-driven compliance system (predict, monitor, manage) in operation, then the delivery of radical greenhouse gas emission reductions will not be readily operationalised. CPRE recommends that local and regional carbon trajectory modelling should be done within local plans and SDS, with overall carbon budget compliance being a key test of plan examination sign off by the Planning Inspectorate.

## 6. Delivering a sufficient supply of homes

### 48. Do you agree the requirements for spatial development strategies and local plans in policy HO1 and policy HO2 are appropriate?

Partly agree

We agree that the general approach set out across policies H01 and H02, that SDSs are to deal with setting the overall number of homes needed whilst local plans setting locally specific policies and allocations, is broadly right. However, and as set out elsewhere in response to this consultation, it is our strong view that generally there needs to be a much stronger emphasis on outcomes, not just numbers, and the policy framework must be clearer about how housing requirements are reconciled with hard constraints.

CPRE recommends that housing need assessments for development plans should not be based on the standard method in Annex D. In this respect and specific to policies H01 and H02, it remains our longstanding concern that the standard method is being treated as a mandatory target-setting tool. The sharp fall in new-build completions since the stock-based method was introduced under the last NPPF only underlines the point that turning up housing numbers on paper does not translate into delivery on the ground. In this respect, hardwiring it into the NPPF via draft policies H01 and H02 and Annex D will only further entrench this numbers-led approach that sets up plans to fail, shifting the consequences onto communities and the countryside.

The standard method is also a blunt tool that has no relation to local need, and in our view has moreover served to reduce the importance of local needs in the process. Research carried out for CPRE by the University of the West of England in 2026 found major gaps have emerged in the evidence base for housing need in rural areas since the introduction of the standard method. Around half of rural local authorities have completed development plan housing need assessments since 2020, with seven having HNAs of more than ten years old. In addition, there are major inconsistencies in method and presentation and it is often unclear from the assessment how much social housing is needed, posing a clear tension with the government's stated aims of increasing the delivery of social housing [1]. These gaps need to be addressed as a priority and the emphasis in national policy should shift towards robust local surveys.

We also have specific concerns with respect to HO2(3)(a) and (b). The policy needs to be clearer that hard constraints may justify a lower requirement, with any shortfall addressed transparently through plan-led redistribution, not by defaulting to increased pressure on constrained areas. We are also concerned with respect to the mandatory tone of HO2(3)(b), which risks recreating the failures of the duty to co-operate at a wider SDS scale by implying authorities must plan for higher numbers to accommodate neighbours without clear, deliverable governance.

The current standard method calculates the number of homes needed, based on an uplift of existing housing stock. CPRE's position is that this stance does not make sense. The mandatory stock-based uplift has seen hikes in housing targets that are divorced from any assessment of local need.

At the root of this is the desire by government to have a housing formula that inflates housing targets to the maximum. However, this ambition is based on the discredited assumption that having higher housing targets and building more homes will see the price of them fall. This has not happened and will not happen because most homes are built by private enterprise which, being in business to make money, will only build and release them at a rate which ensures profitability. Targets for social rent homes, genuinely affordable homes (the current affordable home formula is unrealistic) and homes built on brownfield sites would better support the government's stated ambitions.

CPRE recommends that policy HO1 should be amended so that:

- Development plans primarily take account of the assessment of housing need for the area that is developed specifically in relation to the plan, with the assessment clearly identifying the levels of housing needed by tenure.
- any national standard method formula should be based on up-to-date demographic data and not be stock-based.

[1] <https://www.cpre.org.uk/wp-content/uploads/2026/01/Strategic-Housing-Market-Assessments-in-rural-areas.pdf>

#### 49. Is further guidance required on assessing the needs of different groups, including older people, disabled people, and those who require social and affordable housing?

Strongly agree

Further guidance is needed because current practice is too inconsistent, as highlighted in our answer to 48 above. In rural areas in particular, genuinely affordable housing and social rent are not being delivered at anything like the scale required, and the position is worsened by gaps and inconsistencies in how "designated rural areas" operate and how small and medium sites are treated.

CPRE recommends that policy HO1 should set clearer minimum expectations on what plans must evidence and then deliver, including rural affordable housing on smaller sites, a stronger and more consistent approach to social rent and tenure mix on major sites, and clearer requirements to plan for accessible and adaptable homes to M4(2) and M4(3) standards. It should also reduce reliance on late-stage negotiation and viability by requiring authorities to identify sites or ringfenced portions of sites for different groups, supported by up-to-date needs assessments and transparent monitoring, so plans deliver the right homes for older people, disabled people and those in acute housing need, not just more market housing.

**50. Do you agree with the approach to incorporating relevant policies of Planning Policy for Traveller Sites within this chapter?**

Strongly agree

We support the approach of incorporating relevant policies of Planning Policy for Traveller Sites within this chapter, as it helps ensure Gypsy and Traveller provision is planned strategically and considered in the same way as any other land use within plan-making and decision-taking.

**51. Is further guidance needed on how authorities should assess the need for traveller sites and set requirement figures?**

Strongly agree

The experience of many of our members is that this is currently treated in a patchy and inconsistent manner and therefore would strongly benefit from robust national guidance.

**52. Do you agree the new Annex D to the draft Framework is sufficiently clear on how local planning authorities should set the appropriate buffer for their local plan 5-year housing land supply?**

Strongly disagree.

CPRE fundamentally disagrees with the existing provisions for 20% buffers as both unnecessary and inimical to good plan-making. In that spirit we also disagree with the new requirement at Annex D paragraph 8(g)(c), which would impose, from 1 July 2026, a 20% buffer for decision-making purposes where an authority has adopted a plan in the last five years examined against a pre-December 2024 Framework and the annual average housing requirement is 80% or less of the most up to date local housing need figure. This is unduly punitive and risks penalising diligent plan-making. There are many legitimate circumstances where a plan's annual requirement or housing trajectory is intentionally stepped below the standard method figure, for example where delivery is phased around major strategic sites that take time to unlock, or where infrastructure constraints require a realistic ramp-up. Treating that as a trigger for an automatic 20% buffer invites immediate exposure to speculative development and undermines the credibility of planned stepped trajectories within local plans. Annex D paragraph 8(g)(c) should therefore be deleted.

**53. Do you agree the new Annex D to the draft Framework is sufficiently clear on the wider procedural elements of 5-year housing land supply, the Housing Delivery Test and how they relate to decision-making?**

Partly disagree

Annex D entrenches the underlying problem with the five-year supply and Housing Delivery Test regime. It punishes communities with second-rate new development if the local planning authority fails to meet unrealistic housing targets, even though under-delivery is often market-led and largely outside the control of the planning authority.

The affordability adjustment also has the effect of targeting more homes to places of high property price, which coincides with desirable rural places, including National Parks and National Landscapes. Whilst it is true rural places need more affordable homes, including social tenures, they have constraints such as landscape character, ecology and best and most versatile soils. Annex D as drafted will serve to undermine local efforts to set a spatial strategy by encouraging land speculators to seek more planning permissions for market housing in the most desirable locations. CPRE recommends that Annex D is revised so that greater weight is given to local surveys, and that paragraph 9 (which refers to buffers) is deleted. The housing delivery test thresholds should also be reduced so that the policy is less burdensome to local planning authorities.

#### 54. Do you agree the requirements to establish a 5-year supply of deliverable traveller sites and monitor delivery are sufficiently clear?

Neither agree nor disagree

Whilst we believe such provision should be treated and considered in the same way as any other types of housing within plan-making and decision-taking, as stated in our response to Q51, there is a strong need for further guidance on how authorities should assess the need for traveller sites and set requirement figures.

#### 55. Do you agree the plan-making requirements, for both local plans and spatial development strategies, in relation to large scale residential and mixed-use development are sufficiently clear?

Partly disagree

The draft Framework reflects the government's intent to re-establish strategic planning, which we strongly support. We are concerned, however, that policy HO4 as drafted does not express that intent clearly enough. Specifically, CPRE recommends that HO4 should be amended to make explicit that large scale residential and mixed-use development must be planned through an SDS–local plan partnership, with early and continuous collaboration between the SDS body and local planning authorities. The SDS should set the strategic distribution, infrastructure and delivery principles through an ongoing two-way conversation with local planning authorities, so that housing requirements are shaped by clear evidence about where large sites can and cannot go. Local plans should then allocate the sites and set the detailed requirements. This would keep numbers and places genuinely aligned and reduce the risk of HO4 being used to justify strategic growth without proper local agreement, robust evidence and firm safeguards.

In mixed-use developments, shops should ideally open with the arrival of the first residents and workers to ensure immediate, sustainable footfall. Waiting for the development to be complete or a later phase risks empty, non-contributing units dragging down the attractiveness of the development. The focus should be on creating an instant community high-convenience hub to meet immediate demand and avoid vacant units.

CPRE recommends that policy HO4 should reflect CPRE's 2025 Principles for new towns done well [1] as they relate to large scale residential and mixed-use development. In turn this would involve the following detailed changes to the draft policy:

- HO4,1 add after first sentence 'A good mixed-use development, by using vision and validate planning, should create a usable, attractive and safe environment for all occupants with a strong sense of place; clear separation of public and private space; horizontal and or vertical build as appropriate; a range of local amenities such as retail, employment, education and community facilities and shared spaces, green areas, play zones, and pedestrian links.'
- HO4,1a add 'Public transport services should be available on the arrival of the first resident. Retail opening should be synchronised with the completion of the first phase of housing or commercial space.'
- The list within HO4 (2) should provide the following minimum expectations for large scale sites:
  - o brownfield and infrastructure first,
  - o firm phasing and delivery commitments,
  - o public transport designed in from the outset,
  - o strong protection for high quality farmland, valued landscapes and other sensitive countryside, and
  - o credible arrangements for community input, transparent governance and long-term stewardship.

[1] <https://www.cpre.org.uk/wp-content/uploads/2025/09/Principles-for-new-towns-done-well-2025.pdf>

## 56. Do you agree our proposed changes to the definition of designated rural areas will better support rural social and affordable housing?

Strongly agree

CPRE's 2023 State of Rural Affordable Housing report (1) showed a strong need for more genuinely affordable housing in rural areas, which is not being met by current planning policies. We also showed that only about half of rural England can be considered a 'designated rural area' in the terms set in this question, but the need for affordable housing is acute everywhere. If the change is brought in, it will help address the problem by making clear to landowners and developers that they should include

affordable housing within the smallest sites of 10 homes or less, which isn't the case in half of rural areas at present. This will increase the supply of rural affordable housing through a plan-led approach, reducing the reliance on rural exception sites (RES). In addition, it will result in reducing the price of allocated sites making it easier for SME builders to compete in the land market in rural areas. Lower land values for allocated sites should also reduce the price differential between allocated and RES sites, which should reduce 'hope value' on the latter. CPRE recommends that policy HO5 should not be undermined by any new policy relating to 'medium' sized developments.

In rural areas, affordable housing has increased by 75% since the introduction of the NPPF with the 2024/25 completions being 17,506. Despite this welcome increase, the way in which affordable housing is represented in the data includes all affordable (under the current NPPF definition) for sale and rent, intermediate rent and shared ownership so it is still unclear exactly how many of these are affordable to households on average local incomes or below. As the current definition of affordable housing includes homes for rent at up to 80% of local market rates, many of the homes will still be unaffordable to most. CPRE would like to see affordable housing to be redefined to match local incomes and be genuinely affordable.

[1] [https://www.cpre.org.uk/wp-content/uploads/2023/11/State-of-Rural-Affordable-Housing\\_online.pdf](https://www.cpre.org.uk/wp-content/uploads/2023/11/State-of-Rural-Affordable-Housing_online.pdf)

**57. Do you agree with our proposals to ask authorities to set out the proportion of new housing that should be delivered to M4(2) and M4(3) standards?**

Strongly agree

**59. Do you agree the proposals to support the needs of different groups, through requiring authorities to identify sites or set requirements for parts of allocated sites are proportionate?**

Strongly agree

As outlined in our Strategic Housing Market Assessment in Rural Areas, 2026 report [1] there is great disparity across rural local authorities around setting out clear targets for affordable dwellings, social rent, intermediate rent and shared ownership and there has been a consistent under-supply of new homes in 79% of rural local authorities since 1997. Where policies do not specify a tenure split, they normally have a statement requiring that this is to be negotiated based on the most recent evidence in HNAs and depending on viability. We hope that the new policy HO5 will help address this gap.

[1] <https://www.cpre.org.uk/wp-content/uploads/2026/01/Strategic-Housing-Market-Assessments-in-rural-areas.pdf>

60. Do you agree with our proposals to ask authorities to set out requirements for a broader mix of tenures to be provided on sites of 150 homes or more? Please provide your reasons and indicate if an alternative site size threshold would be preferable?

Partly agree

We agree strongly with the principle of requiring a broader mix of housing tenures (such as social rent and low-cost ownership) on large housing sites being set out in national planning policy. Sir Oliver Letwin's review in 2018 [1] made a powerful case for just this kind of policy. Currently, too many developments in rural areas simply consist of large, expensive 4- and 5-bedroom houses for sale which are out of reach for most average wage earners. The 2026 CPRE /UWE research [2] has also shown that only 14% of new housing in rural areas can be classed as social housing for example, despite the particular need for this kind of housing in rural areas due to average incomes being lower than in urban areas.

Our main concern is that the policy doesn't go far enough because it relies too heavily on local plans being in place. The research also found that most current plans in rural areas are inadequate with only 1 in 5 having any kind of policy seeking more new social housing, and many supporting housing market assessments being out of date or (in the case of Cornwall) absent entirely.

CPRE recommends that the NPPF should set minimum expectations for at least 10% social housing in all major new housing developments of more than 100 homes until plans are updated, and we also believe that the threshold can be set much lower, indeed as low as 50 units.

[1][https://assets.publishing.service.gov.uk/media/5bd6eb3940f0b6051e77b6a6/Letwin\\_review\\_web\\_version.pdf](https://assets.publishing.service.gov.uk/media/5bd6eb3940f0b6051e77b6a6/Letwin_review_web_version.pdf).

[2] <https://www.cpre.org.uk/opinions/how-the-housing-strategy-can-help-fix-the-rural-housing-crisis-2/>

61. Do you agree with proposals for authorities to allocate land to accommodate 10% of the housing requirement on sites of between 1 and 2.5 hectares?

Neither agree nor disagree.

62. Are any changes to policy HO7 needed in order to ensure that substantial weight is given to meeting relevant needs?

Yes. The NPPF should set minimum expectations for at least 10% social housing in all major new housing developments of more than 100 homes until plans are updated, and we also believe that the threshold can be set much lower, indeed as low as 50 units. (For reasoning see suggested response to question 60.) Also, if local circumstances are justified a higher percentage should be required in local plan policies.

*Q63 No response from CPRE*

#### **64. Do you agree flexibility relating to the size of market homes provided will better enable developments providing affordable housing?**

Partly disagree

There is the possibility that more land would be taken for larger homes on greenfield sites. Using more land may not increase the 'viability' of sites to deliver affordable housing and just creates more harm on greenfield land which will often have more functionality for climate mitigation, food production and/or nature recovery if left undeveloped.

#### **65. Would requiring a minimum proportion of social rent, unless otherwise specified in development plans, support the delivery of greater number of social rent homes?**

Strongly agree

CPRE recommends that at least 10% social rent homes would be an appropriate minimum target within all new developments and should be achieved regardless of whether any other affordable housing products are provided. Furthermore, we also support the National Housing Federation call for 25% social rent homes. Ideally the higher percentage of require social housing would aid in easing the housing and affordability crises. Using government data from MHCLG on local authority data (section C – allocations) there has been an increase of 45,767 of those on rural social housing waiting lists from 2018/19 to 2024/25. A similar upward trend is seen in rural homelessness over the same period with 11,377 people. (Data sourced from MCHLG live tables of homelessness [Homeless – Relief Duty Owed]). Rural Social Rent delivery over the same period only averaged 2,743 per year over the seven years.

Demand for housing (particularly in acute areas of need like South East England) is so high that simply increasing the supply of houses (even by the numbers in the government ambition) will not materially change the value of housing to the degree needed to help those in the most acute housing need.

CPRE recommends that, in line with the recommendations of the 2018 Independent Review of Build Out (the Letwin Review [1] ), that the final policy HO8 sets minimum expectations on tenure mix in new developments including proportions of social rent, accessible housing and affordable home ownership

as a baseline which local authorities can exceed (but not fall below) based on the specific needs of their area.

[1][https://assets.publishing.service.gov.uk/media/5bd6eb3940f0b6051e77b6a6/Letwin\\_review\\_web\\_version.pdf](https://assets.publishing.service.gov.uk/media/5bd6eb3940f0b6051e77b6a6/Letwin_review_web_version.pdf).

*Q66 No response from CPRE*

67. Do you agree that applicants should have discretion to deliver social and affordable housing requirements via cash payments in lieu of on-site delivery on medium sites?

Partly disagree

a. if so, would it be desirable to limit the circumstances in which cash contributions in lieu of on-site delivery can be provided – for example, should it not be permitted on land released from the Green Belt where the Golden Rules apply? Please explain your answer.

No comment

b. If you do not believe applicants should have blanket discretion to discharge social and affordable housing requirements through commuted sums, do you think cash contributions in lieu of on-site delivery should be permitted in certain circumstances – for example where it could be evidenced that onsite delivery would prevent a scheme from being delivered? Please explain your answer

Cash in lieu of homes may make sense in certain circumstances where the local planning authority felt this was reasonable, but not if there were too few affordable homes. The threshold could be agreed by the LPA as a percentage of local housing stock or on a need basis, in the parish or a unmet need. This can be evidenced by neighbourhood plan or a needs survey/assessment. Ultimately, cash in lieu of homes should be an exception rather than allowed to become the norm. In the circumstances when it was accepted, the LPA should apply reasonable endeavours to spend the money on provisions within the same parish such as providing a grant to a Registered Provider or similar. If after an agreed timeframe that it was evidenced that it was not possible for the grant to be spent within the parish it could then be spent elsewhere in the district. It would be critical that the grant / cash in lieu payment was ringfenced or protected to be spent within a rural settlement rather than becoming an urban subsidy without the correct safeguards.

68. What risks and benefits would you expect this policy to have? Please explain your answer. The government is particularly interested in views on the potential impact on SME housing delivery, overall housing delivery, land values, build out rates, overall social and affordable housing delivery, and Registered Providers (including SME providers).

If the cash in lieu of homes are protected in a rural ringfenced pot, then it would allow for the continued delivery of the much needed affordable and social homes needed within the rural parish, or elsewhere in the district. If there is a clear mechanism that supports RP and SME builders then it may allow for a sustained delivery rather than seeing a potential stop/start approach where the big builders do not find it viable to delivery affordable or social housing on their sites.

There is a concern that the large-scale developers would use cash in lieu payments as a loophole to not deliver on the affordable and social housing targets by claiming it unviable. This ultimately could cause a drastic decrease in rural affordable and social housing delivery if LPA are unable to fund developments elsewhere, and potentially not use the money which it is intended for.

*Q69/70 No response from CPRE*

71. Do you support proposals to enable off site delivery where affordable housing delivery can be optimised to produce better outcomes in terms of quality or quantity?

Partly agree (no further comment)

*Q72-74 No response from CPRE*

75. Do you agree the proposals provide adequate additional support for rural exception sites?

Partly disagree.

CPRE recommends the trial of a rural exception site 'passport' scheme in cases where Local Authorities have an up-to-date housing need assessment. These 'Planning passports' could also be used to encourage the greater take up of 'rural exception sites', an established tool of developing sites specifically for affordable housing in rural areas.

We support the wording of a draft regulation proposed by Rural Housing Solutions:

'The government amends the Town and Country Planning (Permission in Principle) Order 2017 to include a Rural Exception Site (RES) Permission in Principle (PiP) that requires the applicant to state the

location, number of dwellings and proposed tenure mix. This reduces the risk and cost for providers which include Registered Providers and Community led housing groups.’

**76. Do you agree with proposals to remove First Homes exception sites as a discrete form of exception site?**

Strongly agree

**77. Do you agree proposals for a benchmark land value for rural exception sites will help to bring forward more rural affordable homes?**

Partly agree

- a) If so, which approach and value as set out in the narrative for policy HO10 of the consultation document is the most beneficial for government to set out?

Setting a benchmark value for RES sites for viability assessments would be helpful. This would avoid delays and difficulties securing sites because of ‘hope value’. Ensuring the land price means the scheme can viably deliver a RES policy compliant affordable housing scheme, and that the scheme meets the value for money criteria for Homes England grant funding. In CPRE’s view, the most beneficial for government would be whichever is the higher of £10k a plot, 5x agricultural value, existing use value where appropriate. This is because it would provide a necessary but limited degree of flexibility to consider the different housing market conditions, agricultural land values and uses across the country and that some sites will have an existing use with a value.

**80. Do you agree the proposals in policy HO13 will help to ensure development proposals are built out in a reasonable period?**

Partly disagree

We strongly welcome the explicit recognition in HO13 that, to boost supply, land with permission must be developed “without unnecessary delay”. This is an important campaign win for CPRE, because we have long argued that the system is currently perverse in that councils can do everything asked of them, grant permissions and adopt plans, yet still be punished with speculative pressure on countryside and Green Belt land when the housebuilding industry drip-feeds delivery to maximise profit margins even where permissions already exist. In this respect, we would point to Institute for Public Policy Research (IPPR) research in February 2025 showing that developers have secured planning permission for more than 1.4 million homes since 2007 that have not been built, which echoes earlier analysis done by the Local Government Association.

However, as drafted HO13 is in our view still too woolly to change behaviour. Whilst we can see that HO13 (2) may be seeking to make a nod to a “use it or lose it” type scenario for planning permissions once granted, the reality is starting a scheme earlier is not the same as building out, and it is easy to “start” without delivering homes at pace. Such a condition which reduces timescales for implementation could be easily gamed and has no real teeth as the only possible consequence for a developer is having to re-apply for a site where the principle of development has already been accepted/agreed. Likewise, we see the requirement within HO13 (3) (b) for flexibility just creates an open door for protracted future arguments where affordable housing/infrastructure requirements are sort to be watered down, with the perverse effect of actually slowing down development rather than speeding it up.

CPRE recommends that policy HO13 should require clear minimum information up front for major schemes, including a realistic delivery trajectory, phasing linked to infrastructure triggers, and evidence that the proposed delivery model, tenure mix and delivery partners can maintain build-out rates. It also needs a clearer definition of what a “reasonable period” means, a meaningful test of what counts as commencement, and transparent consequences where agreed delivery is repeatedly missed, so the burden falls on those controlling build-out rather than being transferred back onto communities through further land release. The information should also be collected and analysed by MHCLG, and made publicly available so that there is a wider and more informed understanding of progress of sites with planning permission.

**81. Do you agree the requirements to take a flexible approach to the consenting framework for large scale residential and mixed-use development is sufficient to ensure the opportunities of large scale development are supported?**

Partly disagree

As we set out under Q80, the “flexible approach” in HO13 (3) (b) risks being read as an open door for developers to reopen agreed affordable housing, infrastructure and place-making commitments through protracted renegotiation, which slows delivery and shifts risk onto communities. CPRE recommends that policy HO13 should be tightened so flexibility is only allowed where clear minimum requirements are secured up front, including a realistic delivery trajectory, firm phasing linked to infrastructure triggers, and transparent monitoring, with any later changes strictly evidence-based and a clear presumption against watering down what has already been agreed.

82. Are any more specific approaches or definitions needed to support the delivery of very large (super strategic) sites, including new towns?

Yes. HO13 should be tightened for super-strategic sites and new towns so there is less scope for drift. Specifically, the policy should define what counts as “very large” and, as set out in CPRE’s Principles for new towns done well, require a credible delivery model with a realistic trajectory, firm phasing tied to infrastructure triggers, and clear governance and long-term stewardship.

83. Do you agree with the proposed changes to the Housing Delivery Test rule book?

Strongly disagree.

The Housing Delivery Test is flawed in principle because it reduces something extremely complex to a single headline outcome, then treats that outcome as proof a plan has failed, regardless of the real-world reasons for under-delivery. In this respect, the proposed changes are just window dressing of a policy that ignores the messy reality of delivery, and continues to punish councils and communities for under-delivery driven by factors outside their control. It is also the case that the operation of the housing supply tests is already punishing authorities that have done the right thing by bringing forward ambitious local plans, so we would strongly disagree with the proposal to remove the ‘lower of’ rule for the HDT test, as in some circumstances this may still offer a necessary safeguard.

CPRE recommends that the Housing Delivery Test should be scrapped and replaced with measures that work with all delivery partners to secure timely build-out.

## 7. Building a strong, effective economy

### 84. Do you agree that more emphasis should be placed on relevant national strategies and the need for flexibility in planning for economic growth, as drafted in policy E1?

Partly agree

CPRE wants to ensure that ‘green growth’ is supported and calls on land use policies to ensure locations are genuinely sustainable, supported by integrated transport so employees have a viable option to access via public transport or active travel. Importantly, all new commercial buildings should be net zero, with energy efficiency built in from construction stage, including the installation of solar panels. This should be explicitly written into E1.

The benefits of such growth should be enjoyed in rural areas too. Our recent report with the Rural Coalition [Pragmatix Advisory Ltd Reigniting Rural Futures, May 2024 [1], shows that with the right policy framework, the rural economy could generate an additional £9 billion to £19 billion per year in tax revenues.

In terms of national strategies Policy E1 refers only to the Industrial Strategy (IS) which in turn places great emphasis on ‘priority sectors for growth and support’. Rural areas have potential in some of these areas – i.e. advanced manufacturing, professional and business services- but many of these benefit from agglomeration effects that larger urban areas can offer but rural areas much less so. The IS does not capitalise on the opportunities and specificities of rural areas, particularly the land sector and recognition of rural place as an asset, although Policy E1 b iii) does reference leisure and tourism sectors.

CPRE believes the NPPF should include stronger reference to the land-based economy and its potential to support growth in the green economy. Again, as the primary national strategy referenced, the IS omits to consider the opportunities to support and promote sustainable land-based production such as of high-quality food, fibres and timber, including their processing locally, as part of a wider green economy. The only relevant mentions are minimal and refer to food supply and the role of agri-tech.

CPRE believes that a comprehensive national rural strategy to address the complex and interconnected issues holding back rural productivity should be developed and to which a future NPPF could then refer.

We welcome provisions in E1 1 b that planning authorities should in ‘Seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment;’. Closing the rural/non-rural productivity gap – and so supporting rural economic growth – will require policy intervention across multiple areas including provision of affordable rural housing, access to digital services and local sustainable transport networks with flexible transport to

enable communities to access employment, training and healthcare and other key services [Reigniting Rural Futures p14].

CPRE recommends that E1 calls for strategic planning and oversight from Spatial Development Strategies so that clusters, particularly large logistics (storage and distribution) sheds do not crop up on a continued unstrategic and ad hoc basis, claiming high job-creation, which fail to materialise, or are not transparently accounted for due to poor monitoring of economic value added.

Over the past two decades there has been considerable large format commercial development allowed on appeal in the Green Belt justified on very special circumstances based on claimed high job numbers claimed. This has resulted in urban sprawl in Green Belt locations, such as the M6, M61, M62 from warehousing clusters along motorway corridors, but the claimed jobs have not materialised in anywhere near the promised amount, casting doubt on the VSC conclusion. Therefore, CPRE calls for an improved spatial approach, so any release of Green Belt is truly justified. Green Belt land should be protected for the aim of keeping permanently open and the test for very special circumstances should remain a high bar that is subject to scrutiny in the years following development to hold developers to account.

[1] <https://acre.org.uk/wp-content/uploads/Reigniting-rural-futures-summary-report-FINAL.pdf>

## 85. Do you agree with the approach to meeting the need for business land and premises in policy E2?

Partly disagree

The principle of sustainable development underpins the NPPF. Hitherto and in the new draft the NPPF has not sufficiently acknowledged the value of sustainable nature-friendly farming to the positive management, functioning and character of the countryside. This includes to Green Belts and other urban fringe farmed areas, CPRE, Farming on the Edge, 2025, p21 [1]. In addition, it does not fully recognise the multiple environmental services sustainably managed farmland can deliver. As also noted elsewhere in this consultation response, the NPPF also has failed since its inception to effectively protect high quality farmland from development in line with its stated intent.

In this context we welcome in principle that the NPPF recognises the benefits of supporting development for agricultural modernisation as in E2 1.b and references the benefits for domestic food production, animal welfare and the environment. However, as set out, this text does not adequately differentiate between sustainable farming approaches and other approaches which have and continue to cause environmental harms including to water quality and biodiversity, ecologically sensitive sites and human health through air pollution. We welcome that the revised text could underpin increased provision of new slurry stores, on-farm reservoirs and small-scale solar arrays to support farm sustainability, resilience and reduce water and air pollution. However, we strongly caution against the benefits of 'domestic food production' on their own being deemed to be

sufficient to enable development. If so, this policy could allow expansion of forms of agriculture that are known to cause long term harm to the environment and the opposite of sustainable development.

It is critical that the benefits listed in the clause are assessed together holistically to ensure that particularly local but also national environmental limits are not breached further- especially if harms from development of larger more intensive livestock units is to be avoided. For livestock it is critical that proposals demonstrate they will not impose an increased nutrient burden on catchments, particularly where these are already overloaded. To achieve this the cumulative impacts of new livestock housing need to be assessed by planning authorities within the relevant catchment.

Policy E2 refers to compliance with Policy S5b which includes ‘development for rural businesses and services, including tourism’. Although S5,4 requires that such ‘development should only be approved in exceptional circumstances where the benefits of the proposal would substantially outweigh the adverse effects, including to the character of the countryside and in relation to promoting sustainable patterns of movement’, the interaction between Policy E2 and S5 would lead to inconsistent and unsustainable outcomes. It is unclear what weight of adverse effects would outweigh any benefits.

CPRE recommends that policy S5b should be deleted and the qualification of Policy S5/4 relating to exceptional circumstances should be included in E2. This would involve:

Adding, ‘All development for freight and logistics should be located with access to sustainable passenger and freight transport options and with cargo shipped by rail or water for the majority of their journey. Developments that would result in a cumulative total of more than 1,000 HGV movements a day on a specific road must be supported by sustainable freight transport options<sup>[2]</sup> such as train for long-haul, electric truck or bike for last-mile delivery.’

Adding ‘Assess the traffic and travel impacts of rural development.’

[1] <https://www.cpre.org.uk/resources/farming-on-the-edge/> ]

[2] Besieged by B8s, Community Planning Alliance, 1<sup>st</sup> December 2025

[https://communityplanningalliance.org/wp-content/uploads/2026/01/251201\\_CPA-Report-BESIEGED-BY-B8-WAREHOUSES\\_Dec25.pdf](https://communityplanningalliance.org/wp-content/uploads/2026/01/251201_CPA-Report-BESIEGED-BY-B8-WAREHOUSES_Dec25.pdf)

## 86. Do you agree with the proposed new decision-making policy supporting freight and logistics development in policy E3?

Partly disagree.

CPRE recognises that this policy sets out planning considerations specific to freight and logistics development and associated infrastructure, including access to transport networks, parking provision, and potential impacts on the environment, local residents, and neighbouring uses. CPRE notes the physical and locational characteristics of logistics developments, which due to scale often target Green Belt locations outside of settlements, often entirely road dependent causing congestion, excessive greenhouse gas emissions and air, noise and other pollution to significantly harm the landscape character, purpose of Green Belt, residential amenity and health of nearby residents.

Implementation of Policy E3 'Freight and logistics' could lead to sprawling development with substantial increases in daily traffic flows on inappropriate rural roads, causing harmful increases in air, noise and water pollution and carbon emissions, and adverse impacts on residents, communities and the wider countryside.

Policy S5 is also implicated in Policy E3. According to Policy S5j ii, development for an unmet need and that 'comprises major development for storage and distribution purposes which accords with policy E3' should be approved. Although S5,4 specifies approval 'only in exceptional circumstances where the benefits of the proposal would substantially outweigh the adverse effects, the interaction between Policy E3 and S5 would lead to inconsistent and unsustainable outcomes.

CPRE recommends the following changes to the policy:

- Add 'All development for freight and logistics should be located with access to sustainable passenger and freight transport options and with cargo shipped by rail or water for the majority of their journey. Developments that would result in a cumulative total of more than 1,000 HGV movements a day on a specific road must be supported by sustainable freight transport options such as train for long-haul, electric truck or bike for last-mile delivery.'
- Delete S5j.
- The qualification of Policy S5/4 relating to exceptional circumstances should be included in E3 with the weight of adverse effects that would outweigh any benefits defined.

### 87. Do you agree with the approach to rural business development in policy E4?

Partly agree

We welcome the continued focus on:

- Reuse of existing buildings, provided these are no longer suitable for commercial use i.e. traditional farm buildings which could benefit from reuse and to support diversification and enhanced economic activity

- The importance of good design and its appropriacy to the character of the area; this should include landscape character as well as the design, scale and massing of buildings in the area.
- Siting of development where possible where it is well-connected to existing settlements.

We also welcome support for the viability and sustainability of farm businesses and for development and modernisation of farm infrastructure where this supports sustainable domestic food production. The NPPF or national planning practice guidance should seek to define which forms of food production can be regarded as sustainable going forward or, at the very least, identify and discount those which cause recognised and significant environmental harms which, if not mitigated, should be grounds for refusal of permission.

We disagree with the revised draft because it removes valuable text on reducing and avoiding unacceptable impact on local roads. This is an important check on developments of inappropriate scale which could impose regular HGV movements on roads unsuitable for such traffic, such as large poultry units which do not grow their own feed or transport waste off site rather than dispose of wastes on site on adjacent farmland.

Also, we note that Policy E2 b now requires that developments outside of existing settlement be 'appropriate' in siting and design for their surroundings rather than sensitive to which suggests a weaker or vaguer test. It would be helpful if this section made clear that scale is relevant to design and reflected this in the wording and that surroundings were clarified to mean the character of the wider landscape area.

Policy E4,1c supports facilities for rural leisure and tourism, 'in locations that are not well served by public transport' (E4,2). This could lead to sprawling development with substantial increases in daily traffic flows on inappropriate rural roads, causing adverse impacts on residents, communities and the wider countryside. Facilities to enable rural visitors to travel sustainably should be located in the nearest settlement whenever possible. Also, the interaction between Policy E4 and S5 would lead to inconsistent and unsustainable outcomes. Policy S5b includes 'Development for rural businesses and services, including tourism.'

CPRE recommends the following changes:

- Rewrite Policy E4,1c as 'Rural leisure and tourism facilities must be sustained through public transport and active travel networks that take visitors from the nearest settlement into the countryside. Development creating such facilities must provide a minimum standard of bus service from the nearest settlement and create active travel networks.'
- Add: 'All development for freight and logistics should be located with access to sustainable passenger and freight transport options and with cargo shipped by rail or water for the majority of their journey. Developments that would result in a cumulative total of more than

100  
YEARS



Campaign  
to Protect  
Rural England

1,000 HGV movements a day on a specific road must be supported by sustainable freight transport options such as train for long-haul, electric truck or bike for last-mile delivery.'

- Delete S5b and the qualification of Policy S5,4 relating to exceptional circumstances.

## 8. Ensuring the vitality of town centres

### 88. Do you agree with the proposed changes to policy for planning for town centres?

Strongly agree

We agree with the revised objectives and the emphasis they place on vitality and viability of town centres and prioritising main town centre uses to these locations, as well as recognising the need for planning to tailor ambitions to the type and size of centre.

We also agree in policy TC1 with the inclusion of new text on the need for development plans to be informed by a strategy for town centres in the area and for the development plan to 'Set out the hierarchy of centres' for the local authority area. Given the importance of regional centres and wider catchments to town centre success, this policy needs to also be reflected in Strategic Development Strategies (SDS) as they evolve. In particular, they should aim to prevent the permitting of out of centre developments for main town centre uses which might undermine the local town centre but also other town centres in nearby authority areas.

We also very much welcome the greater emphasis placed in the consultation draft policy TC1 a, b and c on efficient use of land including intensification to 'bring vacant sites and premises back into use'; increasing diversity and considering residential use.

This should include identifying potential for empty upper floors above high street and town centre premises to be converted to residential or office uses. These amount to wasted space but could, with important safeguards on conversion for the comfort and well-being of potential occupants and users, enable densification of town centre footfall and economic activity but be sensitive to the existing built fabric.

We recommend policy TC1 should also reference edge-of-town centre vacant brownfield sites that could be identified and be suitable for regeneration for housing. Centre for Cities research shows town centre health is affected by catchment size, incomes in the local economy, the geography of the economy and the size of the visitor economy [1]. Local planning authorities have limited scope to influence these but could, as they recommend: 'increase the size of the catchment through increasing housing densities within brownfield sites on the fringe of city centres, where there is demand for this type of inner city living, as opposed to more sprawl developments on the edge of town.' [1]

We agree with retention of policies here in TC1d requiring sites to be assessed sequentially based on proximity to the town centre or edge of centre then well-connected to the centre. Larger stores which cannot be located in the centre can nevertheless play an important role as anchor stores (including providing accessible parking) enabling combined trips into the centre and supporting vital footfall in the main centre. Development of suitable sites for residential use will need to be balanced

with a strategic long term assessment of the needs and opportunities of the centre for this kind of anchor store, including within the plan, combined authority and regional areas.

We disagree with the loss of the policy to ‘retain and enhance existing markets and, where appropriate, re-introduce or create new ones.’ The removal of this policy has not been explained. CPRE believes town centre retail markets, particularly where these are concentrated in a market hall, can offer an accessible space for independent traders to supply good food at affordable prices and increase consumer choice of where to buy their food. As part of more localised food supply infrastructure such markets can also play an important role in providing access to the market for smaller local food producers and growers. Local authorities should be encouraged to protect and invest in such markets to maintain consumer choice and an important alternative to the mainstream supermarket and convenience store offer as well as access to affordable fresh food.

[1] <https://www.centreforcities.org/publication/checking-out-the-varying-performance-of-high-streets-across-the-country/>

### 89. Do you agree with the approach to development in town centres in policy TC2?

Strongly agree

No additional comment – see comments for Q2 above

### 90. What impacts, if any, have you observed on the operation of planning policy for town centres since the introduction of Use class E?

No comment

### 91. Do you believe the sequential test in policy TC3 should be retained?

Strongly agree

We believe that the sequential test should be retained along with the relevant impact assessment. Although we recognise the change to PDR rights within use class E may have weakened the effect of the sequential test, we believe that local planning authorities need more powers not fewer to support the vitality of their town centres, albeit within a recognised hierarchy of centres and taking into account a range of other factors such as catchments, access by sustainable transport and impact on consumer choice. Conversion to retail outside the centre for main centre uses and at a scale which can damage town centre retail may initially increase consumer choice but not if it then damages the town centre offer and other stores in the centre close because they cannot compete on economies of scale or they pay higher business rates for a town centre location. This means impact must be assessed where it can

be for the longer-term effects on choice for all consumers not just the economic benefits to those able to travel to out of centre locations by private car. This is precisely what has happened to food retail where supermarkets have expanded in recent decades particularly out of town centres taking ever increasing market share and seeing the food retail offer diminish in town centres with the closure of smaller independent traders such as butchers and greengrocers.

92. Do you agree with the approach to town centre impact assessments in policy TC4?

Neither agree nor disagree

## 9. Supporting high quality communications

No CPRE response to this chapter

## 10. Securing clean energy and water

### 96. Do you agree with the approach to planning for energy and water infrastructure in policy W1?

Partly disagree.

a) There is in CPRE's view an unhelpful lack of process detail in Policy W1.

Firstly, the 'early engagement' appears to duplicate processes already built into the Regional Energy Strategic Plan (RESP). Taking a cue from the emerging RESP, W1 should also include a requirement for wider stakeholding (as per our proposed amended text below).

Secondly, W1 would also be improved by explicitly referencing the RESP and other forums (currently only mentioned in the footnote), also making clear that engagement is part of the RESP process and does not need to be duplicated.

Thirdly it is unclear (either in main text or footnote 38) precisely what weight strategic energy plans (SSEP, CSNP and RESP) will have in the development plan other than be 'taken into account' in the early engagement and that this be reflected in 'making provision'. Text at 2a also refers to 'development that is required' but it is not clear where or what this requirement stems from. We also note here that Policy PM1 at 2f sets out that SDS should also make provision for infrastructure committed to in sectoral spatial strategies, which for energy presumably includes the SSEP, CSNP or relevant RESP. This introduces confusion in terms of where the onus on identifying provision falls within the national planning hierarchy and this needs resolution.

CPRE recommends the following amended text for W1:

'The development plan should be informed by early engagement between the relevant plan-making authority, utility providers, regulators and network operators, and wider agencies and stakeholders so that there is a clear understanding [...]

### 97. Do you agree with the amendments to current Framework policy on planning for renewable and low-carbon energy development and electricity network infrastructure in policy W2?

Strongly disagree.

Important text on the need to avoid adverse landscape and visual impacts (present in NPPF165) has been dropped in the proposed amendments. This is unacceptable and below we have recommended where it should be reinserted.

CPRE recommends the following amendment to W2/1:

1. The development plan should support the transition to clean power by planning positively for the increased supply and use of renewable and low carbon energy and electricity network infrastructure, while ensuring that adverse impacts are addressed appropriately (including cumulative landscape and visual impacts). This means that the development plan [...]

CPRE recommends that policy W2b should be rewritten by cross-referencing to Policy CC2 1e, where we have suggested that a requirement of a minimum % contribution from distributed/local low carbon energy be introduced to speed the pace of low carbon transition.

### 98. Do you agree with the proposed approach to supporting development for renewable and low carbon development and electricity network infrastructure in policy W3?

Strongly disagree.

We agree with W3 1c which gives an important signal to the need and value of greatly increased capacity of local, distributed energy, especially proposals brought forward by communities.

However, we strongly disagree with relaxing policy around energy development outside of identified areas (text at W3 2). There are two overlapping concerns: firstly, the removal of the stipulation in NPPF169 that development outside identified areas meets the original selection criteria. We recommend that this requirement is reinstated.

Secondly, the policy undermines the frontloaded constraint modelling/environmental assessment that forms part of the SSEP/CSNP and RESP spatial recommendations, which then presumably informs area selection in W1 and W2. To re-open and 'widen' the selection 'gate' for a 'second bite' is illogical and reduces confidence in the planning system, especially for the communities that might host such 'off-plan' development. This is especially unacceptable for potentially large-scale energy-related developments.

Therefore, we do not agree with the rationale put forward in the consultation document that locally specific planning criteria, democratically mandated through the local plan process, cause uncertainty; rather, we say they ensure that development is appropriate to local needs and circumstances.

### 99. Do you agree with the proposed approach to supporting development for water infrastructure in policy W4?

Partly disagree.

As we have previously stated in CPRE's response to the September 2024 NPPF consultation, water infrastructure must primarily be concerned with the quality and quantity of water in the national resource. Then with its efficient, sustainable and safe distribution, use and return to the

environment. Infrastructure investment, nature-based solutions, land management and customer behaviour all have a role to play in achieving these objectives.

We therefore support the weight being given to improving water quality and reducing water-borne pollution to help support a new vision for clean water in the UK, as set out by Wildlife and Countryside Link (1).

However, we are particularly concerned that W4 2 undermines the delivery of a sustainable future water system by obviating the requirement to demonstrate need. Such a policy would risk a policy imbalance between the need for new infrastructure and the urgent requirement to address the efficiency of water use (more water reuse, smart metering, and innovative regulation) as highlighted in the new DEFRA White Paper 'A New Vision for Water' (Sir Jon Cunliffe, January 2026) (2).

Unless W4 2 can be suitably qualified by reference to where the need case is set out (e.g. in relevant Water Resource Management Plans), it should be removed.

CPRE recommends the following amendment to W4 1a to better encourage water efficiency:

Amended text for W4 1a:

'1a. The benefits of providing the capacity needed to serve proposed development as well as improving the security of supply, water efficiency and capacity for both new and existing users (both residential and commercial, including agricultural users); and...'

(1) [https://www.wcl.org.uk/docs/WCL\\_Clean\\_Water\\_Now\\_Report\\_2026.pdf](https://www.wcl.org.uk/docs/WCL_Clean_Water_Now_Report_2026.pdf)

(2) <https://www.gov.uk/government/publications/a-new-vision-for-water-white-paper>

## 11. Facilitating the sustainable use of minerals

**100. Do you agree with the proposed prohibition on identifying new coal sites in policy M1, and to the removal of coal from the list of minerals of national and local importance?**

Strongly agree.

The Committee on Climate Change (CCC) have stated that future reliance on coal is deemed incompatible with Net Zero 2050 targets; the CCC therefore recommend a total phase-out. The clear ramification of this recommendation is a strict requirement to prohibit coal extraction, save at currently consented sites (understood to be a small number of sites, mostly minor/artisanal operations). Stopping coal extraction begins with prohibiting identifying new sites and removing favourable policy status by way of exclusion from the list of minerals of importance. However, the total phase out deemed necessary by the CCC also requires further policy amendments; we indicate below where other mineral policies in the NPPF must be changed.

**101. Do you agree with how policy M1 sets out how the development plan should consider oil and gas?**

Partly disagree.

Whilst we agree with the prohibition on identifying new or extended sites for oil and gas outside of licensed areas, the incompatibility of further oil and gas extraction and meeting mandated climate budgets (emission reductions) necessitates more rapid curtailment of oil and gas extraction. In our view, this means that further development (by way of planning consent) of oil and gas within licensed areas should also be prohibited. In climate change terms, there should be no difference in the policy approach to oil and gas, compared with coal. Both should be phased out as soon as is practicable and the best route to this is via policy amendment (as long as it is not retrospective). This can be done without liability for compensation as pro-active Welsh Government action on shale gas licensing has shown. CPRE recommends that text at M1 4 is amended to reflect the necessity of curtailing future oil and gas extraction (including by way of fracking, either by high- or low-volume methods) by way of additional policy restrictions that disallow compensatory provisions, either de facto or de jure.

We also support policy to prohibit peat working (M4 5) and believe this should be strengthened by also restricting working of peat or peat soils when ancillary to other development. This is to protect vital carbon stores (see our comments on CC2 1f at Question 43).

CPRE recommends the following amended text for M1 5:

'5. The development plan should not identify new sites or extensions to existing sites for peat or coal extraction; ancillary working or extraction of peat will not be permitted as part of other forms of development.'

**102. Do you agree with the proposed addition of critical and growth minerals to the glossary definition of 'minerals of national and local importance'?**

Neither agree nor disagree.

**103. Do you agree criteria b of policy M2 strikes the right balance between preventing minerals sterilisation and facilitating non-minerals development?**

Partly disagree.

To align with the thrust of the policy amendments at M1 in respect of coal, M2 needs to specifically exclude safeguarding for coal and onshore oil and gas. It is particularly important to make this distinction given the proposed new requirement (previously encouragement) for prior extraction.

CPRE recommends the following amended version of policy M1:

" M2: Safeguarding non-energy mineral resources and infrastructure through plan-making

1. The development plan should:

- a. Define Mineral Safeguarding Areas and (in two tier areas) Mineral Consultation Areas to support the safeguarding of non-energy mineral resources;
- b. Where necessary to prevent the sterilisation of non-energy mineral resources, require the prior extraction of non-energy minerals on sites allocated for non-mineral development, where practical and environmentally feasible; and [...]"

CPRE recommends that the policy M2 text should cross-reference our proposed amended text at M1 5 regarding the prevention of prior/ancillary extraction of peat.

**104) Do you agree policy M3 appropriately reflects the importance of critical and growth minerals?**

Neither agree nor disagree.

**105) Do you agree with the exclusion of development involving onshore oil and gas extraction from policy M3?**

Strongly agree.

**106. Please provide your reasons, particularly if you disagree.**

Current UK climate and net zero legislation make clear the urgent need to minimise carbon emissions. This indicates the strong disbenefits of coal, oil and gas extraction, whether onshore or offshore. It is clear therefore that no policy weight ('importance') should be given to energy minerals.

**107. Do you agree policy M4 sufficiently addresses the impacts of mineral development, noting that other national decision-making policies will also apply?**

Partly disagree.

**108. Please provide your reasons, particularly if you disagree.**

We are concerned that the last sentence at M4 1c sets out too high a bar ('exceptional circumstances') to gaining surety around restoration. Whilst we recognise that the majority of mineral companies work to high standards of operation and restoration, there are too many cases where provision of restoration bonds (usually straightforward to arrange, e.g. through industry guarantee fund schemes such as the MPA's Restoration Guarantee Fund [1]) could have prevented significant damage to amenity and environment and saved precious mineral planning authority time and resources spent on enforcement.

CPRE recommends the following amendments to policy M4 1c:

c. [...] Bonds or other financial guarantees to underpin planning conditions should only be sought where justified and expedient.

[1] See <https://www.mineralproducts.org/Issues-and-Campaigns/Quarries-and-Nature/MPA-Restoration-Guarantee-Fund.aspx>

**109. Do you agree with approach to coal, oil and gas in policy M5?**

Partly disagree

We have stated above (at questions 100 and 101) the climate/net zero rationale for taking a more prohibitive approach to coal, oil and gas extraction. Whilst M5 helps move in this direction, we have already argued (especially at Q.101) why further consents should be curtailed.

CPRE recommends that:

- Policy M5 should prohibit development (i) within licensed areas; and
- State that where development (‘winning’) may be necessary for public safety or coal mine methane schemes, the associated ‘working’ of energy minerals (i.e. extraction, removal and use, inevitably leading to combustion and emissions) is prohibited. Simply put, fossil fuels need to remain in the ground and not be utilised for energy production. We do not object to ancillary recovery of fireclay but recommend amending M5 3 to reflect the other amendments.

CPRE recommends the following amended text for M5:

“ M5: Development involving peat, coal or onshore oil and gas

1. Proposals for the extraction of peat at new or extended sites should be refused.
2. Development involving surface or underground coal workings, or at onshore oil and gas extraction sites, should not be approved unless it is necessary:
  - a. For public safety; or
  - b. To facilitate the capture and use of methane from coal mines in active and abandoned coalfield areas.
3. If proposals at surface or underground coal sites come forward under the criteria listed above, minerals planning authorities should provide for such schemes to extract separately, and if necessary stockpile, fireclay so that it remains available for use. [...] “

**110. Are there any other exceptional circumstances in which coal extraction should be permitted? Yes/No**

No: see above, Q.109, for our argument separating ‘winning’ and ‘working’ of energy minerals.

**111. If yes, please outline the exceptional circumstances in which you think coal extraction should be permitted.**

Not applicable

**112. Do you agree policy M6 strikes the right balance between preventing the sterilisation of minerals reserves and minerals-related activities, and facilitating non-minerals development?**

Neither agree nor disagree.

In respect of our previous proposed amendments to M2 (see our answer at Q.103), excluding energy minerals from safeguarding, we are presuming that – if the thrust of our amendments are adopted – no further changes would be required to policy M6.

**113. Does policy M6 provide sufficient clarity on the role of Minerals Consultation Areas?**

Neither agree nor disagree.

## 12. Making effective use of land

114. Do you agree policy L1 provides clear guidance on how Local Plans should be prepared to promote the efficient use of land?

Partly disagree

115. If not, what further guidance is needed?

CPRE has repeatedly called for the prioritisation of brownfield land to save green fields from unnecessary development, so it supports an effective brownfield first approach to make the best use of land, and this should be the fundamental objective of the planning system. Current national policy is insufficient, and too easily allows developers to speculate on green fields, rather than land allocated in adopted local plans.

CPRE's State of Brownfield 2025 shows the total suitable brownfield land across on authority Brownfield Registers has steadily increased in the past five years from less than one million to some 1.4 million homes [1]. Our research also shows over a third of brownfield registers have not been updated in the last two years, and nearly 10% of local planning authorities have registers more than five years out of date. This highlights the need for up-to-date brownfield registers as they are essential for evidence-based planning.

Previously, Regional Spatial Strategies (RSS) set brownfield targets and were proven to be effective. Ribble Valley in Lancashire secured 97% of completions on brownfield land in 2009, but this rapidly reduced to 58% in 2014 when the RSS were scrapped. Spatial Development Strategies could helpfully restore more effective reuse of brownfield with a target.

CPRE supports 1.a) and the allocation of small, medium and large sites, and the use of design guides and codes, the setting minimum density standards, and the setting of minimum density elsewhere in local plan areas, along with infrastructure requirements. We should strive for healthy places. Where brownfield land provides an ecological function in an area that is otherwise deficient, serves as a green corridor, or other notable ecosystem service the ecological value should be incorporated into the site design so only partially developed, or retained in full, but in such cases it should cease to be recorded on the Brownfield Register and protected as a site for ecology.

CPRE broadly supports the Brownfield Passport to make better use of land in urban and suburban locations, including through densification. CPRE agrees that there is potential for higher densities, to better support thriving neighbourhoods, improve access to jobs and services, and make the best use of land within our towns and cities. Brownfield sites also tend to be located more centrally or close to existing built places with good transport connectivity. This reduces the need to travel, require less land for parking and road infrastructure, and better support opportunities for active travel (walking, cycling and wheeling).

CPRE thinks opportunities should be taken to optimise use of allocated sites, but it strongly disagrees with 1.c that PDL should not be reallocated if there is no reasonable expectation it will come forward, as during a 20-year SDS or 15 year local plan, the planning system should unlock constraints and make effective use of it, through Brownfield Fund and action promoted by Mayors, and Homes England to secure multiple benefits for people and place. If spatial plans are not used to facilitate reuse of brownfield land then this policy is doomed to fail.

Policy L1 is not set in the context of the emerging Land Use Framework. We strongly support the focus on previously developed land in L1.1 and 3 but L1.2 allows mayors and LPAs to take a broader definition in identifying land that may be suitable for meeting delivery needs. This could lead to unsustainable development unless the SDS is anchored in the Land Use Framework.

Defra's draft Land Use Framework 2025 aim was to enable 'Land use change that improves the overall productivity of land alongside wider social and environmental benefits'. Such change would be through making space for nature recovery, water, and emissions reduction; supporting sustainable and resilient food production; delivering new infrastructure and housing; and fixing the foundations for resilient long-term economic growth.

Taking a strategic joined up approach to land use planning is essential to ensure multiple benefits accrue from land. For example, access to nature and recreational space is essential for housing development; an area is intrinsically linked to the water catchment on which it impacts and depends, and understanding this will be key to developing in locations that reduce the risk of flooding; enhancement of natural capital relies on opportunities identified in the Land Use Framework.

CPRE recommends that Policy L1:

- Sets a requirement for brownfield targets in Spatial Development Strategies to better focus delivery and allow performance to be monitored.
- Sets a requirement for annual updates to Brownfield Registers as a minimum standard and a centralised, regularly maintained national brownfield database to ensure consistency in records, improve monitoring and support strategic planning.
- Includes the following text, 'The Land Use Framework should be used for setting the context of policy making. Supporting sustainable economic growth over the coming decades will mean investing in natural capital and long-term climate resilience.'

[1] <https://www.cpre.org.uk/wp-content/uploads/2025/10/State-of-Brownfield-Report-2025-final-1-1.pdf>

### 116. Do you agree policy L2 provides clear guidance on how development proposals should be assessed to ensure efficient use of land?

Partly agree

CPRE notes the substantive changes to support densification in urban areas, some are supported, but some are not, as set out below.

L2/1.b includes empty homes as an important source of additional housing, and CPRE supports this as there are 1.0 million empty homes in England. [1] Bringing these back into use would deliver a large amount of housing against the governments 1.5million homes target this Parliament. The issue was also referred to by the Yorkshire Building Society, which considers there are opportunities for 2.5 million homes from empty homes and commercial property [2].

Urban intensification is advocated by CPRE to make them more viable and revitalised places. and has additional changes encourage development footprints that optimise a site's development potential where previously undeveloped land is proposed for development.

It agrees that corner plots present an opportunity to support more distinctive placemaking and that redeveloping low density plots provides an opportunity to make more efficient use of land in built locations. CPRE also supports safeguards to prevent cramming of development and overburden of local infrastructure.

Safe egresses are important, as are acceptable living standards, and access to daylight, sunlight, privacy and external amenity space. However there is concern that doubling the original footprint will not be appropriate in all circumstances, so CPRE recommends more flexibility.

CPRE agrees with the use of 'footprints' (L2/d.iii) as a means to optimise a sites potential, but we would also recommend references to necessary green infrastructure to ensure ecosystems are supportive and green corridors to allow nature to move and to soften built places to ensure a high quality of life for people who live, work and visit.

[1] <https://www.actiononemptyhomes.org/facts-and-figures>

[2] <https://theintermediary.co.uk/2026/02/yorkshire-building-society-urges-repurposing-empty-sites-to-unlock-2-5-million-homes/>

### 117. Do you agree policy L2 identifies appropriate typologies of development to support intensification?

Partly agree

CPRE recommends that L2 should refer to the considerable public good in remediating despoiled, degraded, derelict, contaminated or unstable land as it is evidenced living near to such sites causes poor health and early death. See, Healthy land? An examination of the area-level association between brownfield land and morbidity and mortality in England [1].

L2 usefully expects decision-makers to give substantial weight to proposals that promote the reuse of brownfield land. But this should not be limited to decision-taking, as it is vital for plan-making too. At Wirral's Local Plan Examination in October 2022, evidence was before the Examining Authority that people die 11-years earlier on the eastern side of the peninsula where former docks and industrial sites lay in a vacant and neglected state, compared to the more affluent western part of the borough. Developers sought Green Belt release for housing in the most affluent areas, but the adopted local plan, which was unanimously supported by local councillors, seeks to tackle the deprivation as a priority. This approach was found sound by the Examination Authority. In the middle of the local plan examination a speculative appeal was heard. It was rightly dismissed on prematurity grounds.

[1] <https://journals.sagepub.com/doi/pdf/10.1068/a46105>

**118. Do you agree the high-level design principles provided in policy L2(d) appropriate for national policy?**

Partly agree

CPRE agrees that high-level design principles in policy L2(d) are appropriate for national policy.

**119. Do you agree policy L2 (d)(i) achieves its intent to enable appropriate development that may differ from the existing street scene, particularly in cases such as corner plot redevelopment and upwards extensions.**

Strongly agree (no further comment)

**120. Do you agree with the proposed safeguards in policy L2 that allow development in residential curtilages?**

Partly agree

CPRE queries development occupying more than twice the original footprint as in the past it was more limited, so represents a substantial change, which may not always be appropriate. CPRE recommends that the use of this clause should be informed by local design codes where they are in place.

**121. Do you agree policy L3 provides clear guidance on achieving appropriate densities for residential and mixed-use schemes?**

### Strongly disagree

CPRE supports policy to promote the efficient use of land through higher density, with a brownfield first approach being central to this.

It thinks that taking into account the 'actual' need for different types of housing and other development, local market conditions, the availability of infrastructure (including sustainable transport options) and its scope for improvement, a site's connectivity and the importance of securing well-designed, attractive and healthy places is important.

But, the way landscape matters are referred to, here and throughout the NPPF, is of concern as the text appears to downplay the value of landscape character in plan-making and development decisions, and CPRE strongly suggests the government rethinks its approach.

CPRE is highly supportive of a brownfield first approach, but best practice principles on density should be followed and proper use of the Landscape Institutes Guidance for Landscape and Visual Impact Assessment. Existing character of an area should be taken into account and be enhanced by development proposals to make the most of site potential, while contributing to good place making. Increasing density should make attractive places.

CPRE objects to the promotion of development at rail locations outside of settlements due to harm to ordinary countryside, the impact on the rural landscape and characteristics of tranquility. The policy proposed is not sound in planning terms.

Taken together, CPRE is strongly opposed to the text under this policy, as it will not deliver enough brownfield first development in sustainable locations

### 122. Do you agree with the minimum density requirements set out within policy L3?

#### Partly agree.

CPRE welcomes the proposed new direction of setting minimum densities in policy as per L3/3. Arguably, in some contexts a minimum density of 40 dwellings per hectare is quite low. Depending on where the train station is, for example a city, or town centre the prescribed density could be much higher. The same is true for 'well-connected stations', 50 dwellings per hectare is rather low.

CPRE previously called for higher minimum density requirements for residential development near train stations in existing built places, so good public transport is integrated and supports residential and mixed-use development (1).

Outside settlements development around stations should normally be discouraged, as it will ruin rural tranquility.

Population density is extremely important to the success of mass transit systems. At low densities people are dependent on private cars. As density increases public transport becomes increasingly necessary and viable. It is generally considered that the efficient use of public transport begins to

take effect at densities of 62 dwellings per hectare. The only density requirements proposed in NPPF are those for development around stations (40dph) and those around well connected stations (50dph) which appear low. Greater Manchester's Places for Everyone sets minimum densities of 120dph and 70dph for development within 400m and 800m respectively of rail stations serving main centres outside the city centre; and of 70dph and 50dph for development within 400m and 800m respectively of other rail stations. As people are willing to walk up to 14mins or 1200m to a rail station the density should remain high within that distance. Development at business parks is often widely spaced with large car parks leading to car dependent journeys.

Higher densities have significant benefits. The cost of personal transport diminishes rapidly as density increases. Better transport means better access to jobs, amenities, leisure, education. At high densities fast, frequent, reliable public transport systems become fully effective with dramatic reductions in energy and costs. The cost of transporting materials and goods also declines. As the costs go down so does the consumption of energy. As density increases, isolation and social exclusion is reduced for people without a car.

CPRE notes the 60 Travel to Work Areas and it calls for train services to stations within settlements to have a regular frequency of every 15 minutes as well as sufficient capacity to be able to handle the expected numbers of additional trips generated by a new development. CPRE queries whether people can reasonably access jobs, training or education on a half hourly service. It would be much better if based on four trains in each direction. Crucial is adequate capacity on the rolling-stock of services, as new development will not work where trains are already full at peak times.

To improve the policy in the way set out in the introductory chapter box to promote the effective use of land, CPRE recommends:

L3,3 Add: Where development is within an existing settlement and well connected by public transport (including rail stations) the minimum density should normally be 62dph.

(1) [https://www.cpre.org.uk/wp-content/uploads/2019/11/Making\\_the\\_link.pdf](https://www.cpre.org.uk/wp-content/uploads/2019/11/Making_the_link.pdf)

**123. Do you agree that using dwellings per hectare is an appropriate metric for setting minimum density requirements? Additionally, is our definition of 'net developable area' within the NPPF suitable for this policy?**

Strongly agree (no further comment)

124. Do you agree with the proposed definition of a ‘well-connected’ station used to help set higher minimum density standards in targeted growth locations? In particular, are the parameters we’re using for the number of Travel to Work Areas and service frequency appropriate for defining a ‘well-connected’ station?

Strongly disagree.

CPRE notes the 60 Travel to Work Areas (TTWAs) and it calls for train services to stations within settlements to have a regular frequency of every 15 minutes. CPRE queries whether people can reasonably access jobs, training or education on a half hourly service. It would be much better if based on four trains in each direction. Crucial is adequate capacity on the rolling-stock of services, as new development will not work where trains are already full at peak times.

Footnote 45 is not fit for purpose. The TTWAs data is 15 years out of date. The 2021 census was undertaken during the Covid crisis and does not record reliable travel to work data. The top 60 stations in terms of GVA account for 40% of the 149 TTWAs in England. The policy may therefore miss sustainable and suitable sites adjacent to railway stations outside the top 60 TTWAs. As demonstrated by various authors (1) the policy is likely favour development in the south east and London commuter belt, and provide few opportunities for cities in the midlands or north. TTWAs do not match local planning areas; coupled with local government reorganisation this criterion will complicate local plan preparation and decision making.

The train service frequency is ambiguous. Many rail services are overcrowded and there is no capacity on the track for more trains. This could result in passengers nearer the destination not being able to get on the train. Relying on ‘*planned upgrades or through agreement with the rail operator*’ depends on rail operators who may not agree to upgraded frequencies until development is committed in those locations or may not agree at all. Upgrading frequencies may also depend on rail infrastructure improvements which, even if agreed, are notorious for delay and cancellation.

Policy L3 is inconsistent as it applies to all stations; it advises a density of 40dph for a station, or 50dph at a ‘well-connected’ station.

CPRE recommends in relation to policy L3:

- Delete footnote 45
- In L3,3 change the density requirement ‘to a minimum of 62dph within the net developable area.’

References (1) <https://lichfields.uk/blog/2025/december/16/all-aboard-or-stuck-between-stations-how-the-new-nppf-might-unlock-growth-around-rail-stations>

**125. Are there other types of location (such as urban core, or other types of public transport node) where minimum density standards should be set nationally?**

No. CPRE thinks the government is over-reaching its planning role and, outside the instances set in L3/3, setting density standards should be a local matter for combined authority SDSs or local plans of local authorities. Distinctiveness of place will be eroded if there is a one size fits all approach. We would however support policies seeking a general uplift in density in urban cores and preventing decreases in density elsewhere.

Density of development and transport accessibility levels should be linked to create zones centring on major transport stops such as tram, metro and rapid bus stops (see example of Lille in France (1)). These zones should be used to identify potential sites for development around transport routes, with recommendations for high minimum housing densities and reduced parking provision.

(1) <https://www.centreforcities.org/blog/density-the-missing-piece-of-the-uks-public-transport-puzzle/>

**126. Should we define a specific range of residential densities for land around stations classified as 'well-connected'?**

CPRE thinks combined authority SDSs or local plans of local authorities should set their own densities around stations within settlements.

**127. If so, what should that range be, and which locations should it apply to?**

Not applicable

**128. Do you agree policy L4 provides clear high-level guidance on good design for residential extensions?**

Partly disagree

**129. Please provide your reasons, particularly if you disagree.**

CPRE welcomes a push for good design for residential extensions in complement to local design guidance and codes that reflect local character but suggests more policy detail is included to better explain expectations.

CPRE local groups have received considerable enquiries since Permitted Development Rights have been introduced and this has resulted in extensions that do not blend in or contribute to

placemaking in a positive way, and in some cases, they reduce residential amenity for neighbours and leave properties with inadequate external space.

## 13. Green Belt protection

130. Do you agree that policy GB1 provides appropriate criteria for establishing new Green Belts?

Partly disagree

131. Please provide your reasons, particularly if you disagree.

CPRE understands that this policy revises former paragraph 144, and it agrees that when planning for new development the relevant planning authorities ought to consider the addition of Green Belts, such as for existing towns and cities, or new towns that lack them. There are a wide range of benefits from having nearby greenfields that are kept open permanently, not only serving the five spatial planning purposes, but also additional health and well-being positives when people exercise in the network of public rights of way within them, and additional potential for nature's recovery. CPRE believes that the scope to create new Green Belts could be an important tool for metro mayors and a major incentive for them to drive the SDS process.

At the examination of Greater Manchester's Joint Development Plan, Greater Manchester Combined Authority, suddenly dropped its support for Green Belt additions due to threat of legal action by a developer's KC. This decision was later the subject of a Judicial Review by the Save Greater Manchester Green Belt Group and the judge confirmed there was no legal basis for such a threat of legal action, but as the JDP had been adopted the proposed sites failed to be covered by Green Belt designation, meaning an increase in the net Green Belt loss.

CPRE recommends:

- The removal of GB1/1c, which states that new Green Belts must not act as a constraint to long-term sustainable growth ambitions for the relevant area will act as a blocker. It would be practically impossible in our view to designate additional Green Belt parcels with this in place, as the landowner and or site promoter would claim it was part of their long term growth ambitions for the area, irrespective if it was identified as part of the local plan. Also, a reference to sustainable development should be retained.
- That policy GB2 on assessment should also apply to the creation of new Green Belts.

A new poll by More in Common, for CPRE [1], reveals that 86% of Britons support Green Belt and three-quarters of young people want more of the UK countryside protected.

[1] <https://www.moreincommon.org.uk/our-work/research/fieldwork-public-attitudes-toward-the-british-countryside-housing-and-the-future-of-the-green-belt/>

**132. Do you agree policy GB2 gives sufficient detail on the expected roles spatial development strategies and local plans play in assessing Green belt land?**

Strongly disagree

CPRE supports GB2.1, which refers to all five purposes of the Green Belt, all important to keeping land permanently open; and GB2.2 which calls for Strategic Green Belt Assessments as part of the SDS process. In CPRE's view this is the best and most objective way to identify sites for release if exceptional circumstances are justified. But the rest of the section creates confusion as to whether exceptional circumstances can be defined by a combined authority or a local plan authority, and if relevant to both, how an SDS will relate to local plans, particularly on allocation or release of Green Belt.

Since the NPPF changes in 2024 introduced grey belt policy, there have been many Green Belt appeals allowed, however it transpires 88% of the land involved was greenfield land, and has included both BMV land and local wildlife sites, as shown in CPRE's Grey Belt Planning Appeals analysis report December 2025 [1]. This runs contrary to promises from the Prime Minister and Housing Minister that 'grey belt' would be poor quality and/or brownfield land such as disused car parks and petrol stations. The policy has caused confusion and raised developer aspiration for consents in the Green Belt, encouraging poor practice and 'greying of land', which is irresponsible.

CPRE recommends the deletion of Policy GB2.3 as it undermines the long-term integrity of the Green Belt as a planning tool. However, if the grey belt policy is retained, we would recommend as a minimum that grey belt:

- can only be identified during a Strategic Green Belt Assessment and not by development application; and
- is defined so that it cannot include either (i) best and most versatile agricultural land or (ii) local wildlife sites, in addition to the existing policy exemptions from grey belt.

[1] <https://www.cpre.org.uk/resources/grey-belt-planning-appeals-analysis/>

**133. Do you agree with proposals to better enable development opportunities around suitable stations to be brought forward?**

Strongly disagree.

We oppose changes to Green Belt policy contained in draft policy GB3 to allow more development on the basis that it is close to a railway station. This undermines Green Belt purposes and would result in sprawling suburban development and an increase in car usage, as there is no guarantee that the development would be in or next to an existing town and connected social facilities. There are several

stations in the Metropolitan Green Belt, for example, that are devoid of existing infrastructure and facilities.

Building around such stations will only encourage ribbon development and increase countryside encroachment as new infrastructure would eventually need to be constructed to serve the new, growing population in the area. Concentrating development around stations can also increase congestion especially during peak times and in turn, encourage car usage instead.

It would also contradict policy GB5 on beneficial uses of Green Belt land, as building on land near stations would lead to the loss of open countryside that would be easiest for people from towns and cities to reach by train. We would support a policy that encouraged more housing development on previously developed or brownfield land close to railway stations in towns, as this would help regenerate existing towns.

As written, the policy is too much of a blanket solution; it would better achieve its aim of promoting sustainable, commuter-friendly housing if it were limited to urban stations and excluded isolated rural ones lacking supporting infrastructure.

#### **134. Do you agree the expectations set out in policy GB5 are appropriate and deliverable in Local Plans?**

Partly agree.

#### **135. Please provide your reasons, particularly if you disagree.**

CPRE welcomes the additional references to community food production and to Protected Landscapes. However, we do not believe that the current NPPF policy is having much influence in cases other than compensatory measures for when Green Belt is released for development. The policy should be much more closely monitored and more widely encouraged at plan examination.

#### **136. Do you agree policies GB6 and GB7 set out appropriate tests for considering development on Green Belt land?**

Strongly disagree.

Green Belt policy provides more than 30 million people living in cities and towns access to nearby countryside to support a good quality of life. CPRE has considerable research showing that Green Belt is strongly supported, in a recent poll over 86% of people support it, as evidenced in answer to question 131.

Those development proposals that are appropriate (or not inappropriate) in the Green Belt), should be expected to demonstrate they are sustainable development and based on integrated transport, meaning the majority of journeys will be via active travel and/or regular public rail and bus services with adequate capacity to serve the proposed development.

CPRE recommends that:

- GB7.1a should be restricted to buildings as it could lead to agricultural land owners enlarging farm yards to increase the scale of development in the Green Belt and lead to significant impacts.
- grey belt (GB7.1gi) is either scrapped or restricted to plan-led development as per our response to question 132.
- GB7.1gii should be scrapped as it is too easy for developers to claim unmet need for housing schemes which may do little or nothing to meet identified affordable housing need.
- GB7.1h should be scrapped or substantially qualified as, in its current form, it would lead to excessive sprawling suburban development and increased car usage, as there is no guarantee that the development would be in or next to an existing town and connected social facilities. Concentrating development around stations can also increase congestion especially during peak times and in turn, encourage car usage instead. It would also contradict policy GB5 on beneficial uses of Green Belt land, as building on land near stations would lead to the loss of open countryside that would be easiest for people from towns and cities to reach by train. We would support a policy that encouraged more housing development on previously developed or brownfield land close to railway stations in towns, as this would help regenerate existing towns. GB7.1h also duplicates policy for development near railways in settlements or outside of settlements.

**137. Do you agree policy GB7(1h) successfully targets appropriate development types and locations in the Green Belt, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12?**

Strongly disagree.

See response to Q136 above.

**138. Please provide your reasons, including any evidence that this policy would lead to adverse impacts on Gypsies and Travellers.**

As stated above, Policy GB7(1h) is problematic, and it does not sufficiently ensure that development in the Green Belt delivers the types of homes and places that are most needed. While higher-density and mixed-use development is positive in principle, the policy lacks meaningful emphasis on

affordable and social housing. At a time when wider national policy is weakening Green Belt protections, developers face even fewer incentives to prioritise genuinely affordable homes. This risks turning Green Belt release into a profit-driven opportunity rather than a response to the housing crisis.

The proposal to allow more development simply because land is close to a railway station is also problematic. This approach could encourage sprawling suburban development in locations that are not part of existing towns, lack social infrastructure, and ultimately increase car dependency (see response to 133 and 136). A more effective and sustainable approach would be to build higher-density housing and mixed-use development on previously developed or brownfield land, close to railway stations within or adjoining existing towns. This would support regeneration, make better use of existing infrastructure, and avoid unnecessary loss of open countryside.

### 139. Do you agree that site-specific viability assessment should be permitted on development proposals subject to the Golden Rules in these three circumstances?

Strongly disagree.

Major development should be steered by strategic spatial plans and not speculation.

The government's approach raises major questions about the Golden Rules. The effectiveness of this policy has yet to be tested in terms of its influence on final finished developments, and should be evaluated in these terms before exceptions to it are provided.

GB8.1 states that "development should still make the maximum possible contribution to affordable housing and other infrastructure requirements" where these circumstances apply. However, this wording fails to address the third Golden Rule, which requires "the provision of new green space, or improvements to existing green space, which is accessible to the public." This omission is particularly concerning where development already encroaches on Green Belt land. Without explicit protection for green space contributions, viability assessments could be used to weaken or remove compensatory measures needed to offset the loss of open countryside.

Viability assessments should not be routinely permitted, even within the three circumstances identified, because they are often exploited to justify development in locations that would not otherwise be acceptable. Allowing them in these situations risks undermining a plan-led system and enabling developers to work around policy rather than comply with it.

For previously developed land, as noted in question 140, the definition of previously developed land requires significant refinement to prevent predominantly greenfield sites in rural (including Green Belt) areas from being misclassified as 'brownfield' curtilage garden land. Until this is addressed, permitting viability assessments risks incentivising development on land that should remain protected.

CPRE recommends that across all three exceptions, viability assessments should only be accepted with the following safeguards:

- They must apply only to genuinely previously developed land, with a presumption against Green Belt release where a site is predominantly greenfield (see question 140);
- Land value assumptions must be based strictly on existing use value, not speculative uplift;
- All viability evidence must be independently verified, fully transparent and publicly available;
- Viability should never be used to reduce affordable housing, infrastructure contributions, or the provision and enhancement of publicly accessible green space;
- Viability assessments should be treated as exceptional, not a routine mechanism for reducing policy compliance.

**140. With regards to previously developed land, are there further changes to policy or guidance that could be made to help ensure site-specific viability assessments are used only for genuinely previously developed land, and not predominantly greenfield sites?**

CPRE supports prioritising development on previously developed land

The definition of previously developed land should be tightened – terms like ‘occupied by a permanent structure’ and ‘large areas of fixed surface infrastructure’ are not clearly defined and can be used to justify classifying land as brownfield in rural areas even when it is mostly open countryside. To prevent this, the definition should explicitly exclude sites where small, incidental, or derelict structures sit within an otherwise greenfield plot; A clear minimum threshold of development should be introduced—for example, requiring that a specific proportion of the site must be demonstrably developed for it to qualify as previously developed land. Where a site fails to meet these conditions and is predominantly greenfield, there should be a presumption against Green Belt release to ensure only genuinely brownfield land is built on.

To avoid developers self-classifying previously developed sites in ways that favour development, site classification should require independent verification by a qualified third party before any viability assessment is submitted. All supporting evidence should be publicly available to ensure transparency and credibility.

**141. Do you agree with setting an affordable housing ‘floor’ for schemes subject to the Golden Rules accompanied by a viability assessment subject to the terms set out?**

Strongly agree.

142. Please explain your answer, including your view on the appropriate approach to setting a 'floor', and the right level for this?

A minimum affordable housing requirement is essential (see response to question 65 above), particularly in the context of national policy changes that weaken Green Belt protections. Without a firm affordable housing 'floor', developers have little incentive to prioritise genuinely affordable homes, and Green Belt release risks becoming a profit-driven exercise rather than a targeted response to the housing and cost-of-living crisis. A clear, enforceable floor would help ensure that any loss of greenfield land delivers meaningful public benefit and aligns with the purpose of viability assessments and the Golden Rules.

There must also be a stronger emphasis on what "affordable" actually means. Current definitions—especially those tied to market-dependent "affordable rent"—do not reflect what people on lower incomes can realistically pay. A more appropriate measure is residents' disposable income, ensuring that housing costs are linked to what local people can genuinely afford rather than fluctuating market values. An effective affordable housing floor should therefore be income-based, for example by setting it as a fixed percentage of average low incomes in the area. In this regard, town and parish councils should be consulted as they know best the geography and what is required of the local area. This approach would help ensure that affordable housing delivered through Green Belt release is genuinely accessible to those most in need, and reinforce the principle that Green Belt land should only be released where it delivers clear and substantial social benefit.

143. Do you agree with local planning authorities testing viability at the plan-making stage using a standardised Benchmark Land Values scenario of 10 times Existing Use Value for greenfield, Green Belt land?

Strongly disagree

There should be third party assessments of land values and viability assessment.

144. Do you have any other comments on the use of nationally standardised Benchmark Land Values for local planning authorities to test viability at the plan-making stage?

No comment

145. Do you agree that proposed changes to the grey belt definition will improve the operability of the grey belt definition, without undermining the general protections given to other footnote 7 areas?

Strongly disagree.

CPRE has major concerns about the 'grey belt' provisions introduced into Green Belt policy in the December 2024 NPPF which has opened up valuable open countryside to unnecessary development. Despite claims made by the Prime Minister and others that the policy would only lead to the loss of supposedly 'poor quality' Green Belt land, our research [1] has in fact found that government planning inspectors have used the policy to permit development on high quality farm land and recognised local wildlife sites. Another example grey belt designations being exploited in practice was highlighted by our local group in Oxfordshire [2].

We believe that 'grey belt', rather than being widened, should be removed from national planning policy, with major development only being allowed in the Green Belt if it is agreed through the new spatial development strategies. But if the policy is maintained it should be narrowed to exclude high quality farmland and local wildlife sites from being designated as grey belt, and grey belt development should not be allowed on appeal against local refusals of planning permission. It would be worth reinstating paragraph 11 (presumption in favour of sustainable development) and footnote 7 from the current NPPF to ensure appropriate emphasis is placed on the prioritisation of Green Belt protection. Without this safeguard, there is a risk that grey belt development becomes the default route rather than an exceptional last resort.

[1] <https://www.cpre.org.uk/news/research-shows-most-grey-belt-homes-planned-on-unspoilt-countryside/>

[2] <https://www.cpreoxon.org.uk/news/land-behind-the-moors-another-green-belt-success/>

## 14. Achieving well-designed places

146. Do you agree that policy DP1 provides sufficient clarity on how development plans should deliver high quality design and placemaking outcomes?

Partly agree

DP1 is broadly clear and we support the stronger emphasis on design and placemaking being secured through the plan-led system. However, what is not clear is as to which Development Plan would be “at the most appropriate level”, which risks patchy and inconsistent expectations. We also believe that DP1 should be clearer that significant growth, strategic allocations and large sites must be underpinned by up-to-date local design codes and masterplans, shaped through meaningful community involvement, so quality is locked in early and not eroded later.

147. Do you agree with the approach to design tools set out in policy DP2?

Partly agree

DP2 takes a sensible approach in promoting a suite of plan-led design tools and a proportionate level of detail, and we support the emphasis on early community engagement, so schemes are shaped before positions become entrenched. We also welcome and strongly agree with the provision within DP3(2) that confirms substantial weight must be given to local design policies, guides, codes and masterplans tools.

It could however be clearer about when tools such as site-specific design codes and masterplans are expected so they are not treated as optional extras. We would also like to see the policy go further in seeking to prevent post adoption manoeuvring that erodes the quality and placemaking outcomes communities were promised.

148. Do you agree policy DP3 clearly set out principles for development proposals to respond to their context and create well-designed places?

Partly agree

DP3 is generally clear and we support its emphasis on proposals responding to context and creating well-designed places. We particularly welcome the new paragraphs on climate and nature considerations in DP3/1c and 1d.

However, it should be firmer that this includes landscape character, and that good design must reduce the need to travel by car through compact, walkable neighbourhoods. We also believe it should more clearly support higher densities in the right locations, where services and public transport already exist

or can be secured early, and make explicit that sustainable transport must be designed in from the outset, not retrofitted.

To best promote well-designed, healthy, inclusive and sustainable places, CPRE recommends the following changes:

- Combine Policy DP3 with Policy TR1 and add to Ch 2, to create an overarching vision-led policy which integrates spatial and transport planning.
- Give vision-led planning its full title ‘vision and validate.’
- Add introductory text ‘Integration of land use and transport planning starts with a vision- a collective ambition for how a place could look and feel- attractive, prosperous, safe, healthy, and easy to get around. It is anchored in the aspirations of local people and looks to a future that is outcome based, not project based. Vision led planning considers how transport and travel choices directly or indirectly influence these factors and sets out the interventions needed to achieve the right outcomes. It is iterative and holistic, embracing flexibility, learning from past mistakes and adapting to uncertainty. By collaborating stakeholders work towards shared common goals such as reducing private car dependency and ensuring equitable access to essential services. Development patterns and transport networks evolve in tandem, not by transport planners reacting to planners’ development. The local community is actively engaged throughout<sup>[1][2]</sup>.’
- Add outcomes with quantifiable targets for increasing use of sustainable travel modes and reducing vehicle miles by private car.
- Key government departments- DESNZ, DEFRA, DfT and MHCLG – must integrate their planning and strategy implementation and provide leadership to regional, sub-regional and local authorities, to give equal weight to, and to deliver all ‘three pillars of sustainability’ – social, environmental and economic
- A National Transport Strategy is essential to plan for all travel and transport modes together.

<sup>[1]</sup> Vision led planning – how to plan development and transport infrastructure more sustainably, Transport for Quality of Life, 2025 <https://tps.org.uk/public/downloads/zOLIm/Vision-Led%20Planning%20Report.pdf>

<sup>[2]</sup>TRICS Decide and Provide Guidance Summary 2022 [https://trics.org/wp-content/uploads/2024/10/trics\\_dp\\_guidance\\_summary.pdf](https://trics.org/wp-content/uploads/2024/10/trics_dp_guidance_summary.pdf)

149. Do you agree with the proposed approach to using design review and other design processes in policy DP4?

Partly disagree

We support the greater emphasis on design review and other design processes, especially for major housing and mixed-use schemes. However, it is disappointing that draft policy DP4 does not include an explicit expectation of meaningful community involvement as part of these processes, which we believe it should.

More generally, DP4 will only raise standards if the design review process is genuinely independent, applied consistently, and given real weight in decision-making, including to stop quality being watered down after permission through later changes. In this respect, whilst we strongly support DP4(2)(c) in principle, it is unclear how this will work in practice i.e. will there be a clear requirement for later reserved matters and variations to be tested explicitly against the approved design quality?

CPRE recommends the retention of the policy on advertisement control that is currently in NPPF141. A separate regulatory regime (given in the consultation paper as the reason for removing the policy) also exists for listed building consent, but NPPF policies are relevant to that regime.

## 15. Promoting sustainable transport

150. Do you agree that policy TR1 will provide an effective basis for taking a vision-led approach and supporting sustainable transport through plan-making?

Partly agree.

a. Please provide your reasons, particularly if you disagree.

CPRE supports the vision-led approach, which integrates spatial and transport planning, in TR1 but its elements are split between policies DP3 and TR1 and it must apply to all policies of the NPPF if it is to realise its full potential.

Validation i.e. monitoring and evaluation is essential to vision-led planning. Objectives with quantifiable target are essential for validation.

TR1a does not emphasise engagement of local communities through vision led planning.

TR1b – The glossary definition of ‘sustainable transport modes’ does not prioritise these modes or explain their relative contribution to sustainability.

TR1f High quality travel hubs are essential for creating seamless multimodal journeys.

TR1,2 will undermine reducing the need to travel. Traffic must reduce, not increase to accommodate development. Policies such as DP3, L2, TR1, TR2 and TR4 would limit traffic movement from new development.

CPRE recommends the following changes are required to make TR1 an effective basis for taking a vision-led approach and better supporting sustainable development through plan-making:

- Combine TR1 with Policy DP3 and add to Ch 2 to create an overarching vision-led policy which integrates spatial and transport planning.
- Give vision-led approach planning its full title ‘vision and validate.’
- Add introductory text as in answer to Q148
- Add to the start of the second sentence of TR1a ‘Local communities should be at the centre of the process as definers of the ambition and co-designers of the plan,’
- To TR1a add ‘Public transport to support travel to, from and within the development should be available from day 1 of occupancy of the first house.’
- To TR1b add a diagram of the sustainable travel hierarchy which should be followed for prioritising planning, investment and implementation [1]

- Add new TR1f 'Travel hubs/interchanges should provide multimodal choices as appropriate, enable seamless high-quality journeys for those making multimodal journeys, make it easy to travel across an area, and reinforce a sense of place'.
- Replace TR2,2 with 'Existing road space should be allocated and managed to prioritise public transport and active travel.'

[1] <https://www.cpre.org.uk/resources/cpre-transport-policy/>

**151. Do you agree that policy TR2 strikes an appropriate balance between supporting maximum parking standards where they can deliver planning benefits, and requiring a degree of flexibility and consideration of business requirements in setting those standards?**

Partly disagree.

**a. Please provide your reasons, particularly if you disagree.**

CPRE believes that parking standards are a valuable tool in the drive for modal change. Maximum standards are welcome, but the draft policy frames them as conditional and this could lead to them not being set. Car clubs reduce the need for second and third private car ownership.

Taking local car ownership into account may inhibit the setting of maximum standards. New developments of four or five houses can have double garages (no room for cycles however) sometimes even triple garages and no cycle sheds. This approach will continue to undermine active travel and public transport as the first choice replacement modes and will lead to expensive road interventions, climate emissions and congestion.

CPRE recommends the following changes to policy TR2:

- Strengthen criterion 2 to reinforce the use of sustainable transport modes and reduce car use, particularly for shorter journeys.
- Replace TR2,2 with a threshold for no increase in traffic.
- To TR3,3c after car sharing add 'the use of car clubs as a sustainable and cost-effective alternative to reduce private car ownership'
- To TR2,3b add 'Provide a range of cycle parking and secure cycle storage options.'

152. Do you agree with the changes proposed in policy TR3(1a), including the reference to proposals which could generate a significant amount of movement, and the proposed use of the Connectivity Tool?

Partly disagree.

CPRE welcomes paragraph TR3/1d on active travel modes in rural areas.

The glossary definition of ‘sustainable transport modes’ does not prioritise these modes or explain their relative contribution to sustainability. For example, EVs are not at the top of the hierarchy, and active travel is more important than public transport as every journey begins with a walk. We strongly support NPPF’s aim to ‘limit the need to travel’ for which good quality digital communications are essential. The criteria for what constitute good connectivity for public transport should be explicit and consistent.

TR3,1a gives developers a get out clause. The reference to developments that lead to significant amounts of movement will lead to unsustainable development.

The impacts of motor vehicles that should be avoided and mitigated to achieve environmental gains should be comprehensive in TR3,1c.

TR3,2 The connectivity tool is only available to us in the limited version so we cannot judge its effectiveness.

CPRE recommends the following changes:

- Add a diagram of the sustainable travel hierarchy [1] which should be followed for prioritising planning, investment and implementation.
- Add unambiguous criteria for good connectivity for public transport – ‘400m from home to bus stop in urban well-serviced areas; 800m (10min walk) from home to bus stop in rural areas where bus services are less frequent; maximum 1200m (15min walk) from home to rail station.’
- Remove ‘unless the nature of the use makes this impractical from TR3/1a’.
- Add ‘Planners and highway officers should work together on large developments from the initial idea of an application. When more than one large development is proposed the cumulative impacts of all the developments together should be assessed,’ To TR3/1a.
- To TR3/1c add ‘noise, light, vibration, dust and water pollution’. CPRE welcomes the rest of the draft paragraph TR3/1c.

- TR3 connectivity tool should be supported by a minimum standard of bus service throughout rural areas to which all development should add improvements.

[1] <https://www.cpre.org.uk/resources/cpre-transport-policy/>

**153. Do you agree that proposed policy TR4 provides a sufficient basis for the effective integration of transport considerations in creating well-designed places?**

Strongly agree.

CPRE recommends that the government revises the Manual for Streets, footnoted in TR4/2, so it aligns with publication of NPPF. In our view it is out of date and fails to recognise the new approach to transport.

**154. Do you agree with policy TR5 as a basis for supporting the provision and retention of roadside facilities where there is an identified need?**

Partly agree.

CPRE recommends adding ‘new facilities are not considered appropriate development in the Green Belt’ to TR4/2. This is because, such facilities in the Green Belt (and on green fields) lead to degradation of the surrounding environment including habitat fragmentation, pollution of air and water (via contaminated runoff), and soil contamination from heavy metals and de-icing salts. They also contribute to localized noise, light, clutter of signage and heat island effects while altering hydrology. There have been suggestions of safety impacts where traffic leaves/rejoins the carriageway, suggesting facilities should be off through routes and located in nearby settlements.

**155. Do you agree that the amended wording proposed in policy TR6 provides a clearer basis for considering when transport assessments and travel plans will be required, and for considering impacts on the transport network?**

Strongly disagree.

The new wording of sub-paragraph TR6/3 is a step in a welcome direction, however we do not believe the policy as a whole is sufficient. CPRE recommends the addition of two sub-paragraphs that support vision-led planning:

‘ The purpose of transport infrastructure: Transport infrastructure should be approved only if it:

- Shifts trips to sustainable transport modes to reduce carbon emissions.

- Reduces casualties where they are high, through small-scale changes.
- Adapts roads to the impacts of climate change.
- Supports prosperity by providing access to development sites that will achieve high sustainable transport mode share.

If the infrastructure is a new road, it must:

- Minimise carbon emissions in construction.
- Not increase road capacity for cars.
- Not lead to higher vehicle speeds that increase emissions.
- Not adversely affect ecologically valuable sites.’

CPRE believes that our recommended changes are necessary to stop the problem of TR6 offering ‘predict and provide’, which contravenes TR1 vision led planning, undermines DP3, T3, T4, and CC2 all of which promote sustainable travel modes, and will lead to increases in carbon emissions in contradiction to CC1.

TR6,1a- The government’s Transport Appraisal Guidance is flawed and relies largely on improving journey times for private cars, whilst underplaying the importance of bus and active travel journeys. The TRICS Consortium is now emphasising the need to adopt vision-led planning[1]. NPPF must follow that lead.

Consideration of ‘all reasonable future scenarios’ brings into play the DfT traffic forecasts for huge increases in traffic requiring unsustainable major road building.

TR6,1b Travel Plans accomplish little as they are not mandatory or enforced and the funding for them is limited. The Planning Policy Guidance on Travel Plans and Assessments, last updated in 2014[2], is out of date.

TR6, 3 permits any scheme to proceed. Traffic needs to reduce, not increase to accommodate development. Policies such as DP3, L2, TR1, TR2, TR4 would limit such traffic.

[1] <https://trics.org/decide-and-provide/>

[2] <https://www.gov.uk/guidance/travel-plans-transport-assessments-and-statements>

**156. Do you agree the proposed text in policy TR7 provide an effective basis for assessing proposals for marine ports, airports and general aviation facilities?**

Strongly disagree.

CPRE recommends the following changes to policy TR7: the redrafting of Policy 7/1c (as per our comments below), and the replacement of Policy 7/1d with ‘Enhance the environment in terms of noise, air quality, light, vibration, dust and water pollution carbon emissions, the transport network, landscape, visual and marine impacts.’

As it stands, Policy 7/1c is inconsistent with the climate change policies CC1 and CC2 and achieving net zero 2050. While we accept that some airfields will need to be maintained for national defence or emergency service purposes, new airfields and airport expansion should be ruled out as they generate congestion and demand for new roads, sprawling development on greenfield sites, noise and light pollution, and are unsustainable [1], as demonstrated by the proposed Heathrow expansion. In line with the well-recognised sustainable travel hierarchy, NPPF should promote sustainable passenger and freight transport via rail or water.

Policy 1d relies on an ‘acceptable environmental effect’ and contains an incomplete list of environmental matters. The developer should be required to enhance all aspects of the environment, not an ‘acceptable effect.’

[1] <https://www.aef.org.uk/what-we-do/airport-expansion/>

### 157. Do you agree with the additional policy on maintaining and improving rights of way proposed in policy TR8?

Strongly agree.

## 16. Promoting healthy communities

158. Do you agree with the approach to planning for healthy communities in policy HC1, including the expectation that the development plan set local standards for different types of recreational land, drawing upon relevant national standards?

Partly disagree

CPRE welcomes draft wording in HC1 to ‘promote the creation of healthy and inclusive places, and the provision, retention and enhancement of appropriate community facilities and public service infrastructure’ and the role of development plans. There are often cases of development being approved where no provision of community facilities is planned, and no obvious benefit is delivered to the local people where a development is taking place.

We also welcome the reference in footnote 58 to Natural England’s Green Infrastructure Standards for England although there should be a hyperlink to the website: [Green Infrastructure Home](#) as there is with the other two references in the footnote. This section should also set out that there must be full public consultation and engagement about the types of community facilities and public service infrastructure in an area, proactively reaching people in an area who might require different methods of involvement.

Planning for health outcomes must be a strategic priority for plan-making and decision-taking. We believe that all Local Plans should demonstrate a clear understanding of the determinants of poor health within the Plan area and seek to reduce health inequalities. The UK Health Security Agency’s report on health inequalities, confirms that people living in the 20% most deprived areas are most affected by disease and disproportionately by climate and environmental hazards eg air pollution. (gov.uk, May 2025). Focusing on these determinants of health is essential for improving population health and well-being and reducing inequalities.

159. Do you agree that Local Green Space should be ‘close’ to the community it serves?

Strongly agree

Yes, CPRE asserts that Local Green Space (LGS) should be close to the community serves, where it has been designated in a neighbourhood or local plan. We welcome the continued inclusion of tranquillity as a reason for LGS to be designated. Research published by CPRE revealed that since 2022, 24% of newly designated LGS cited tranquillity as a reason for designation. ([report](#))

We note that the draft NPPF has excluded mention of the LGS being consistent with national policy for Green Belt but that it ‘should be capable of enduring beyond the end of the plan period’. It is vital

that any green space designated as a LGS is enduring and not subsequently allocated for development, which undermines the aim of the designation for the community.

CPRE recommends that government should expand the list of possible reasons for local significance, as cited in the both the draft and 2024 NPPF: the reasons for local significance listed in policy HC2 of the draft NPPF should be expanded to include the role of green spaces in contributing to (i) climate change adaptation and mitigation; and (ii) to the functioning of wider places and systems (such as wildlife corridors, views and settings, and natural drainage areas). The possibility of attributing collective designation to a group of locally valued green spaces that may not be demonstrably special on an individual basis but which, as a network, help define the character of a place, should be specified. Such a change would be an additional ‘at scale’ network of LGS that is in ‘close proximity to the community it serves’.

### 160. Do you agree that the proposed policies at HC3 and HC4 will support the provision of community facilities and public service infrastructure serving new development?

Partly disagree

Inevitably, the impact of new development is on people, nature and infrastructure in a local community who, as paragraph 1 of HC3 says: ‘Proposals for housing, employment or other development which would give rise to significant numbers of additional people living in, working in or visiting an area’. Policies HC3 and HC4 focus instead on facilities to serve people who live in a new housing development, which might exclude people who already live in the local area.

CPRE recommends that paragraph 1a and 1b removes references to ‘off site’ as if a development is approved, then any mitigation, such as creation of community facilities and public service infrastructure should be directly provided on site as default.

In policy HC4 paragraph 2, we welcome mention of engaging local communities in design proposals. However, this should not be an option for developers. CPRE recommends that wording at the end of this paragraph ‘Where appropriate’ is removed. It is always appropriate to engage with local communities on design proposals.

CPRE is concerned that policy HC3 and HC4 could be ineffective if local councils do not enforce planning conditions agreed for provision of community facilities and public service infrastructure.

CPRE recommends the text of HC3 also states that ‘a basic minimum standard for bus services should apply,’.

No answer to Q161

**162. Do you agree with the proposed approach to retaining key community facilities and public service infrastructure in policy HC6?**

Strongly disagree.

Firstly, this policy reads as though it is intended to give an ‘easy option’ for developers. We welcome the introductory wording in paragraph 1 that ‘Development proposals should not result in the loss of key community facilities and public service infrastructure serving a local area’. However, this is followed by ‘unless’ and then paragraphs 1a sets out that ‘if there is no reasonable prospect of the facility being retained, due to there being insufficient community support for the service it provides, or it no longer being viable’ and paragraph 1b describes that the loss resulting from the proposed development would be replaced by equivalent or better provision. For both Para 1a and 1b, how would a developer gather such evidence eg if a shop is not viable and how would this be measured? How would a developer know what the local community actually wants as equivalent or better provision?

CPRE recommends that, in paragraph 2 of HC6, the last sentence should be removed. This states that ‘The policy applies only where the facility would be the last of its type in the area concerned.’ In effect, this sentence suggests that everything is fair game, unless it is a last facility for a community. There is no evidence as to why ‘one size fits all’ policy wording such as this, is appropriate in all development proposal areas.

**163. Do you agree with the approach taken to recreational facilities in policy HC7, including the addition of ‘and/or’ with reference to quantity and quality of replacement provision?**

Partly disagree

CPRE welcomes the opening wording in paragraph 1, which states that development proposals ‘should not result in the loss of existing open space, sports and recreational buildings and land, including playing fields, other formal and informal play space and allotments.’ Yet, it is followed by ‘unless’ and we are concerned by wording in paragraph 1a that an assessment has been undertaken that has clearly shown the open space (etc) to be surplus to requirements – we assert that any open space is likely to be used by people who live nearby. It is important that people in the local community are consulted about whether they use and benefit from a particular open space, so that it is part of any assessment by a developer. This is also the case with paragraphs 1b and c.

164. Do you agree with the clarification that Local Green Space should not fall into areas regarded as grey belt or where Green Belt policy on previously developed land apply?

Strongly agree

CPRE agrees with the wording that 'development proposals for land which has been designated as Local Green Space should be determined in a manner consistent with the relevant national decision-making policies for land in the Green Belt'.

## 17. Pollution, public protection and security

### 167. Do you agree with the criteria set out in proposed policy P3 as a basis for securing acceptable living conditions and managing pollution?

Partly disagree

CPRE welcomes the proposed new mention of artificial light in P3 Living conditions and pollution. Paragraph 1b mentions that development proposals should... 'avoiding exposure to levels of air, noise, artificial light or other sources of pollution which could have an unacceptable adverse effect on health and wellbeing and paragraph 1c 'Not give rise to, or contribute to, an unacceptable level of access to daylight and sunlight for neighbouring residents and occupiers, or unacceptable levels of air, noise, artificial light, water, soil or other forms of pollution on or beyond the site.'

Many forms of lighting are a statutory nuisance. CPRE welcomed the first UK law tackling light pollution which came into force in 2006 under Section 102 of the Clean Neighbourhoods and Environment Act (2005). Exterior lighting joined noise and smells on the list of things that can be treated as a Statutory Nuisance; things against which local council Environmental Health Departments can take legal action. The law made 'exterior light emitted from premises so as to be prejudicial to health or a nuisance' a criminal offence. However, this law does not tackle all forms of light pollution, only incidents of particularly bad lighting from some types of premises which cause people real nuisance. But CPRE would like to see it used, to raise awareness of the issue and to help people who really are suffering from severe light pollution.

Artificial light in particular is known to 'go beyond the site' as described in the wording of paragraph 1c. Light doesn't respect boundaries; it can spread for miles from the source and blurs the distinction between town and country.

CPRE is concerned that the reference to tranquil areas in policy P3, section 2 ( c) is not matched with a reference in policy P1 to encourage the designation of tranquil areas in plans, in contrast to policies in the current NPPF. CPRE recommends that policy P1, section 1( c) is amended to encourage the designation of tranquil areas alongside strategic nature-based solutions.

CPRE welcomes the continuation of the policy in policy P3, section 2, which begins: ‘Within this context development proposals should’... 2d) ‘Limit any adverse impact from artificial light on local amenity, intrinsically dark landscapes (those entirely, or largely, uninterrupted by artificial light) and nature’. A positive addition in the draft paragraph 2d is the wording in brackets: (those entirely, or largely, uninterrupted by artificial light).

CPRE recommends that the NPPF 2024 wording that begins paragraph 2d should be reinstated to begin: ‘Limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes local amenity, intrinsically dark landscapes (those entirely, or largely, uninterrupted by artificial light) and nature; and nature conservation’.

## 18. Managing flood risk and coastal change

No CPRE response to this chapter

## 19. Conserving and enhancing the natural environment

179. Do you agree that the proposed approach to planning for the natural environment in policy N1, including the proposed approach to biodiversity net gain, strikes the right balance between consistency, viability, deliverability, and supporting nature recovery?

Partly disagree.

There are two parts to our response to this question: (i) landscapes and nature recovery and (ii) Best and most versatile land.

(i) landscapes and nature recovery

CPRE welcomes the opening section of paragraph 1, which states that development plans should safeguard and enhance the natural environment and lists various environmental evidence such as Local Nature Recovery Strategies and Protected Landscape Management Plans. We also welcome N1/1a which allows for local landscape designations. CPRE recommends that the opening paragraph 1 should also include 'landscape character statements'. This addition would inform policies 1a and 1b.

However, we are concerned about the wording of policy N1/1c which states: 'Steer the location of development, including through site allocations, in ways which utilise land of least environmental value where that would be consistent with other policies in this Framework. We question how a Development Plan could assess whether land is 'of least environmental value', with various, and at times conflicting, evidence sources.

We disagree strongly with wording in policy N1/1c, which appears to devalue the importance of the developing Local Nature Recovery Strategies. The wording 'Areas which could become of particular importance for nature identified in Local Nature Recovery Strategies should be taken into account as opportunities to integrate development with environmental restoration, but should not necessarily preclude the allocation of land for development. This undermines the statutory regulations to create Local Nature Recovery Strategies, as well as targets to achieve a 30% conservation of land, sea and inland waters and 30% restoration of degraded ecosystems to be achieved by 2030. CPRE recommends that the line 'but should not necessarily preclude the allocation of land for development' is deleted from the final policy.

CPRE recommends that paragraph N1/d) should include a hyperlink reference in footnote 68 to Natural England's Green Infrastructure Framework. [Green Infrastructure Home](#).

(ii) Best and most versatile land (BMV)

As stated in the Objectives natural capital is central to sustainable growth but they should recognize the criticality of productive farmland to maintaining production of food for national security. BMV Land in England is limited – just 16.8% of farmland is grade 1 and 2 – and vital for arable crops especially horticulture where expansion is needed and planned. England’s croplands are important to UK food security as they represent 85% of the UK total [1]. Food production faces multiple pressures so policy should better safeguard this finite stock.

We welcome inclusion of the sequential test on land quality in policies N1 and N2 as previously recommended by CPRE. The policy needs however to be strengthened as recent evidence of its ineffectiveness shows.

Natural England’s 2025 research [2] shows for 2013-2022:

- 61,487 ha of BMV (high or medium likelihood) (58%) land developed – far above the estimated BMV area of one third of farmland (per 1988 Provisional Agricultural Land Classification [ALC] maps.-- for 28,000 ha post 1988 detailed ALC mapping was available showing nearly BMV land loss of 12,000 ha or 42.6%
- case study analysis indicated planning applications for larger areas were no more likely to be refused, suggesting policy wording on ‘significant areas’ carries little weight.

We need urgent action to better protect high quality productive farmland and soils, as farmland faces multiple pressures which could jeopardise future food supply:

- Government projects transition on 1.19 mn ha (14% of the Utilised Agricultural Area) away mainly or completely away from food production to meet Environment Act and net zero targets. [3].
- Risk of severe reduction in the extent of higher grade land- on a high emissions scenario the extent of BMV in England and Wales could fall from 30.4% of agricultural land in 2020 to 15.7% in 2050 and 6% in 2080. [4]
- Flood threat to over 212,000 ha (60%%) of grade 1 land and some 550,000ha (25%) of grades 1 and 2 land in the highest risk category (Environment Agency zone 3). [5]

CPRE recommends the urgent introduction of a national strategic policy to safeguard such land to reflect its critical role in food supply and its irreplaceable soils and which should be referenced in the NPPF. The evidence of current policy failure indicates that LPAs lack the strong policy steer and guidance to protect high quality farmland as a national strategic asset while they are in their locality required to deliver housing targets and enable economic and infrastructure development. We also recommend stronger NPPF protection (see our answer to Q181).

[1] <https://www.cpre.org.uk/wp-content/uploads/2025/02/Farming-on-the-edge-FINAL.pdf> (Table 2 pp8-9)

[2] [Review of Agricultural Land Take to Development](#)

[3] [Land Use Consultation Analytical Annex](#) (pp17-18 section 3.2)

[4] [Capability, Suitability & Climate Programme. Rerun SP1104 with UKCP18 data](#)

[5] [Building](#) (p11 and p20)

**180. In what circumstances would it be reasonable to seek more than 10% biodiversity net gain on sites being allocated in the development plan, especially where this could support meeting biodiversity net gain obligations on other neighbouring sites in a particular area?**

CPRE recommends that either the NPPF or planning legislation should strengthen requirements for biodiversity net gain so as to afford better protection for endangered (red list) species. As it stands, a developer can gain permission and achieve 10% BNG by planting a few trees while at the same time decimating prime habitats for ground-nesting birds such as skylarks which have suffered enormous population declines in the UK in recent years. In England, biodiversity net gain has a key role to play in assisting with the delivery of the Environment Act 2021 requirements including legally-binding targets for nature.

Local planning authorities can use their own BNG planning policies to require a higher minimum percentage of net gain above the national 10%. In April 2025, only four local authorities (Guildford Borough Council, Maidstone Borough Council, Mole Valley Council and Worthing Borough Council) had adopted policies that require more than the minimum mandatory 10% net gain. 30 local authorities have upcoming policies which, if adopted, will require more than the minimum mandatory 10% net gain.

Local resourcing for BNG enforcement also remains a significant challenge. Many LPAs are facing a critical shortage of in-house ecologists or those with ecological expertise, along with other functions related to BNG – for example, legal teams, planning inspectors, and financial planners. The National Audit Office (NAO), in its 2023 report on BNG, likewise identified compliance and enforcement as key risks to the long-term success of statutory BNG.

Wildlife & Countryside Link estimate that £43 million per annum will be required to build Local Planning Authorities' capacity to deliver Biodiversity Net Gain, including through enabling access to digital tools, sufficient training and recruitment. CPRE supports Link's recommendation that each LPA have at least one dedicated ecologist, larger authorities or those experiencing high development pressures may require teams of 3–5 specialists to manage the increased workload effectively. With 39% of LPAs lacking in-house ecological expertise, and often having to rely on expensive consultants, the £16.7 million allocated for BNG implementation remains insufficient.

[1] [Wildlife & Countryside Link](#)

**181. Do you agree policy N2 sets sufficiently clear expectations for how development proposals should consider and enhance the existing natural characteristics of sites proposed for development?**

Partly disagree

CPRE is concerned that the new policy N2 will be insufficient to protect valued landscapes, especially those outside nationally protected landscapes which are covered by Policy N4. Landscape value is a measure of landscape quality. Landscape which demonstrates a combination of qualities that elevates it 'beyond the ordinary' is of higher landscape value, and this is the test for 'valued landscapes' as currently protected under paragraph 187 of the current NPPF. Qualities 'beyond the ordinary' include rural character, scenic quality, far reaching views, sense of history, historic lanes, recreational use and enjoyment by the public, and contribution to landscape character. These qualities are fundamental to the natural beauty and enjoyment of our countryside which have been cherished for generations by those living in and visiting it, both within our Protected Landscapes but also outside the nationally designated landscapes where much fine landscape is to be found.

Valued aspects of landscapes are currently protected under paragraph 187a of the current NPPF. New policy N2 paragraph 1a recognises the need to consider the natural beauty of the countryside, and this will be assisted by including the concept of landscape value, which is now well established in Court judgments and planning appeal decisions. We believe that they will continue to apply to consideration of landscape conservation issues in planning decisions and so it makes little sense not to refer to valued landscapes within the new NPPF.

We assert that the valued landscape policy is not a blocker to considered well designed development. Our analysis of the Compass Planning database of planning appeals has found that since the valued landscape policy was introduced in the NPPF in 2012:

- There have been 251 planning appeals between 2013-2026, of which 39% were approved, 60% dismissed and 1% partly approved by Planning Inspectors. This has varied year on year, with a 50% split in 2016 and in 2025, 53% of planning appeals were approved
- Of the 251 planning appeals, 173 were for conventional houses – 36.4% of appeals were approved and 63.6% were dismissed. This is followed by appeals for affordable/low-cost housing (which CPRE supports in principle) at 49 appeals since 2013 and 38.8% approved and 61.2% dismissed

- The main planning issues considered in the 251 appeals are rural character in 219 cases (37.3% of those were allowed, 61.3% were dismissed and 1.4% were partly approved); followed by housing need or supply calculations, considered in 156 appeals (38% were allowed and 62% were dismissed); local designations of landscape value was considered in 50 planning appeals (28% were approved, 66% were dismissed and 6% was partly approved)

These statistics show that the NPPF valued landscape policy plays an important role in protecting and improving the natural environment. It is not an unnecessary blocker to development but illustrates an effective national policy that reduces the potential to damage valued landscapes.

CPRE recommends that N2/1(a) to be amended to refer to 'landscape character and value' and to the 'intrinsic value and natural beauty of the countryside'.

CPRE welcomes the new mention of 'landscape character' in N2/1a and understand that government's intention is to promote use of Natural England's 159 National Character Area profiles. CPRE recommends that a footnote should be added alongside the first mention of landscape character which links to Natural England's National Character Area profiles.

We welcome the new policy protections for established trees and hedgerows in N2/1d. CPRE recommends that the words 'wherever possible' should be removed from N2/1d as this will encourage non-compliance. CPRE is contributing towards the Environmental Improvement Plan's hedgerow creation and restoration target through our Hedgerow Heroes campaign, where local CPRE groups are working with partners such as farmers and councils to plant and restore hedgerows. CPRE considers ancient hedgerows, as defined in the Hedgerows Regulations<sup>4</sup> (1997) as being an irreplaceable habitat. Policies should be developed in local plans to ensure that hedgerow planting is integrated in new developments and that any damage to existing hedgerows is avoided (biodiversity net gain should never justify the removal of important hedgerows).

We welcome the clarity that restoration of text from footnote 66 (as in NPPF 2024 version) into the main body of the policy brings and avoids any misunderstanding that this policy is of a lesser consideration.

CPRE believes the current policy does not give due weight to the national strategic importance of high-quality agricultural land in the plan and decision making process so that it remains, as the evidence set out in Q180 shows, poorly protected from development. It also fails to give due weight to the importance of particularly lowland deep peatland soils for agriculture/ horticulture (usually grade 1 or 2) but also their wider natural capital value as internationally important, irreplaceable stores of organic carbon.

CPRE recommends revisions to the NPPF across policies N1 and N2 to minimize the loss of valuable farmland:

- introduce a firm presumption against development on BMV land — the higher the ALC grade, the greater the weight which should be attached to its protection.
- make site-specific surveys mandatory on any development proposals of more than 1 ha unless the site clearly will not contain BMV land.
- require local authorities to identify and track development on BMV land in their area.
- revise the wording on the development test for significant areas (N1B; N2B) to “Use areas of poorer quality agricultural land in preference to that of higher quality, where significant development of agricultural land is unavoidable (taking into consideration land which is classified as best and most versatile agricultural land, and its grade); and
- require the development applicant to fund site soil surveys by an experienced soil surveyor to be appointed and to report independently (such as by the local planning authority).

**182. Do you agree the policy in Policy N4 provides a sufficiently clear basis for considering development proposals affecting protected landscapes and reflecting the statutory duties which apply to them?**

Strongly disagree.

CPRE disagrees that Policy N4 as drafted would provide an adequate planning protection for considering development proposals affecting Protected Landscapes – National Parks and National Landscapes. These places are nationally designated and cover England’s finest landscapes.

We welcome part of paragraph 1, which states that ‘Development proposals within Protected Landscapes should be limited in scale and extent and sensitively located and designed to avoid harm to their statutory purposes and special qualities.’ However, we are very concerned that the wording has been changed so that there is no longer a clear direction to refuse major development proposals that do not fulfil the relevant policy test. The draft has also removed the long-standing wording which says “which have the highest status of protection” in reference to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes. This could lead to significant risk to protected landscapes, potentially undermining the long-standing planning protection for these places. As National Landscapes are not planning authorities, it could cause a particularly severe impact in these areas.

CPRE welcomes new wording in paragraph 3 which mentions tranquillity and dark skies. CPRE’s night sky mapping found that 53% of England’s pristine dark skies, free of light pollution, are in National Parks and National Landscapes. 59% of National Parks have the darkest skies possible, along with 40% of National Landscapes. This shows that protected landscapes cover much of England’s darkest skies and suggests that the designation is helping to protect these dark skies – another reason these places should have the highest level of planning protection.

We are also concerned that as currently drafted, the policy could allow too much discretion in defining “major development” and in applying the exceptional circumstances test. The list is non-comprehensive and therefore remains considerably open to interpretation, particularly in relation to development needs that are not expressly identified. This creates a risk that the concept could be expanded over time to justify schemes that were not intended to meet such a high bar.

CPRE recommends that policy N4 is redrafted so that it states:

- Protected landscapes “have the highest status of protection.” (N4/1)
- Proposals for major development within protected landscapes should be refused unless there are exceptional circumstances where it can be demonstrated that the development is in the public interest. (N4/2).
- Support for the legal duty on relevant authorities to “seek to further” the purposes of Protected Landscapes was introduced in the Levelling-up and Regeneration Act 2023.

CPRE recommends additional planning practice guidance covering how alternatives outside designated areas should be assessed.

### 183. Do you agree policy N6 provides clarity on the treatment of internationally, nationally and locally recognised site within the planning system?

Partly disagree

In policy N6/1a ii) and 1b iii) there is the same wording in different contexts: ‘the impact of development on the relevant protected feature of the protected site is being addressed through an Environmental Delivery Plan which has been made and the developer has committed to paying the nature restoration levy’.

Waterways are a fundamental feature of our countryside as well as a vital wildlife habitat and vanguard against the extremes of climate change. Net nutrient neutrality rules exist to prevent developers from cutting corners and to promote best practice.

Statutory designated sites for nature conservation should benefit from the proposed Nature Restoration Fund but these sites should receive complete protection from development if we are serious about reducing the decline in biodiversity. Designated sites should be nodes from which ecological assets and functions could spread to adjacent and nearby nature recovery sites. CPRE has significant concerns about Environmental Delivery Plans and will set these out in detail in response to question 184.

#### 184. Are there any further issues for planning policy that we need to consider as we take forward the implementation of Environmental Delivery Plans

Yes, CPRE has significant concerns. We submitted a response to the MHCLG & Defra Planning Reform Working Paper: Development and nature recovery, in January 2025 which set out our view on the proposals for Environmental Delivery Plans. (Please do contact us for a copy of this response if required).

CPRE recommends that:

- That the mitigation hierarchy of avoid, mitigate and then compensate should continue to be a central tenet of good planning, with the expectation that development should firstly avoid damage to habitats/green space;
- That some habitats should remain excluded from this process as irreplaceable habitats so that they are not inadvertently lost. CPRE considers ancient hedgerows, as defined in the Hedgerows Regulations (1997) as being an irreplaceable habitat. The proposed approach appears to suggest that habitats and species are simply tradable commodities, easily and instantly replaced or recreated elsewhere;
- Developer contributions to the Nature Restoration Fund should not excuse developers from ensuring that on site/biodiversity net gain measures to reduce a development's impact on nature/environment are adopted and that people's access to nature and green space is improved. For example, grey water harvesting, installation of bat and swift boxes etc should still be required;
- Any enhancement from the Nature Restoration Fund should be delivered as local as possible to where the impacts of development take place and have a long-term management plan, with the nature restoration then protected from future development in perpetuity;
- The proposed Delivery Plan model should be piloted first before considering widespread rollout, as it is critical that unintended consequences of the proposed model can be understood;
- Guidance on the creation, monitoring, enforcement and review of Delivery Plans should then be developed.

Given the technical complexity of the ALC and its relationship to the BMV categories we would welcome additional text in the glossary to briefly explain how the grading relates to potential outputs. We believe that the relationship of grade to the productive potential is important and should be clearly explained to planners and well expressed in the policy.

The glossary text does to some extent misrepresent the ALC by suggesting the grading is based on how cropping is affected whereas it in fact grades agricultural land based on objectively determined physical factors of 'climate, site and soil and their interactions. The BMV grades are determined indeed by "the range of crops which can be grown, the level of yield, the consistency of yield and the cost of obtaining it." [Revised Defra guidelines 2025 p 8 ]

CPRE recommends that the glossary entry for BMV be rewritten as follows:

Best and most versatile agricultural land (BMV) : the Agricultural Land Classification (ALC) assesses land quality from grades 1 to 5. BMV is land in grades 1, 2 and 3a based on the range and versatility of crops that can be grown and potential yield for a given level of inputs."

CPRE recommends that ancient hedgerows are added to the glossary definition of irreplaceable habitats:

Irreplaceable habitat: Habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. They include ancient woodland, ancient and veteran trees, ancient hedgerows, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen.

## 20. Conserving and enhancing the historic environment

No CPRE response to this chapter

## Further questions

Q185-191 no CPRE response

### 192. Do you agree with the transitional arrangements approach to decision-making?

Partly disagree

We understand the case for a clear start date, but the transitional approach is not clear enough on how decision-making should treat the many local plans that are currently being rushed towards submission or examination under the current framework. In practice it risks a cliff-edge, where the new national decision-making policies become a decisive material consideration overnight, weakening the weight that can be given to recently prepared or well-advanced local plan evidence and inviting more speculative arguments in the interim.

The draft should therefore include a more protective and explicit transitional rule. CPRE recommends that, as a minimum, the NPPF should state that where a plan is at an advanced stage (for example Regulation 19/submission or in examination), decision-making should continue to give that plan significant weight and avoid re-opening settled strategic choices purely because the new framework has been published. It should also give clearer treatment for live applications and appeals already in the system, so communities are not penalised for doing the right thing and pressing ahead with plan-making.

### 193. Do you have any further thoughts on the policies outlined in this consultation?

No further comment

### 194. Do you agree with the list of Written Ministerial Statements set out in Annex A to the draft Framework whose planning content would be superseded by the policies proposed in this consultation?

#### a. Please provide your reasons, particularly if you disagree

Neither agree nor disagree

## Annex A: Data Centres and onsite energy generation

195. Do you consider the planning regime, including reforms being delivered through the Planning and Infrastructure Act, provide sufficient flexibility for energy generation projects co-located with data centres to be consented under either the NSIP or TCPA regime?

Neither agree nor disagree.

### a) Please give reasons.

Our principal concern – which applies equally to co-location under either NSIP or TCPA regimes – is around locational choices for energy generation and data centres and the impacts that ensue from sub-optimal choices. To CPRE, this begs questions of the interface between NSIP and TCPA planning and NESO’s emerging suite of strategic energy plans (SSEP, CSNP and RESPs).

In principle we welcome co-location of low carbon energy generation and any high energy users (including data centres) as this should reduce the need for long distance electricity transmission and hence the need for new connections (often by unsightly overhead lines/pylons). However, with undersupply of, and huge connection demand for, grid supply points (GSPs), this can lead to ‘clustering’ at or near GSPs with potentially significant negative effects on communities (visual amenity) and landscape character.

The steer towards co-location must therefore be guided by additional policy safeguards that can mitigate such effects. This would include better landscape siting of the relevant development (whether generating station or data centre), even if at a greater distance from the GSP, with connection between the sites being via underground cabling. Developments may also be co-located at greater distances, e.g. the announcement of a new AI growth zone in North Wales<sup>[1]</sup> where different elements of the growth zone (new generating capacity at Wylfa, Anglesey/Ynys Môn; two separate growth zones at Menai and Trawsfynydd) can be separated by many miles, for varied reasons (energy system benefits, environmental constraints, economic regeneration opportunities and so on). Such locational safeguards will need to be considered in any new national policy statement (NPS) for data centres and in NPPF policies for schemes coming forward under TCPA.

In considering the questions below, CPRE would also note our concerns regarding the sustainability of data centres, especially in relation to excessive energy use and impact on achieving clean power and net (even when energy demand is met by renewables), efficient water use, and other environmental impacts. These factors need to be dealt with in a more holistic and comprehensive planning framework, both within the NPPF and the NSIP regime, including steering data centre location much more strategically, both in relation to wider energy system planning (e.g. through the SSEP) and minimising cumulative effects through strategic site selection at a local plan level.

<sup>[1]</sup> <https://www.gov.uk/government/news/ai-growth-zones-to-create-thousands-of-jobs-and-unlock-up-to-100-billion-in-investment-as-new-site-confirmed-for-north-wales>

196. Would raising the Planning Act 2008 energy generation thresholds for renewable projects that are co-located with data centres in England (for the reason outlined above) be beneficial? Yes/No

No.

a) If so, what do you believe would be the appropriate threshold? Please provide your reasons.

Our answer of 'no' is caveated by our concern that raising the threshold at this time, and thereby diverting more applications through the Town & Country Planning Act system, would likely cause undue pressure on LPA resources, already hindered by skill shortages (especially for specialists) and local government reorganisation. This could be reviewed in the future once some of the additional planning resources promised to local authorities start to take effect.

197. Do you have any views on how we should define 'co-located energy infrastructure'? Please provide your reasons.

CPRE believes there are two aspects to defining co-location. Firstly, there is spatial co-location – i.e. how close does the data centre and the generating capacity need to be considered as 'co-located'? As illustrated in the North Wales example in Q.195, spatial separation (even in different planning areas) may be both feasible and desirable, as long as the developments are functionally linked. However, if involving two (or more) planning authorities, this will introduce complexity and this will need to be addressed carefully, also bearing in mind which planning regime is being utilised. This could be an argument in favour of allowing flexibility for the Secretary of State to direct applications between the regimes, if properly justified. Please also see our comments at Q.195 regarding potential adverse cumulative impacts associated with 'close' (contiguous) co-location; the need to avoid/minimise such impacts should be recognised in policy.

Secondly, there is functional co-location to consider: probably principally defined by the proportion of generation output to be utilised by the data centre. Whilst we understand that the heavy energy demand of data centres will often mean all or most of the energy output will be used directly by the co-located data centre, a policy favouring co-location should not become a justification for inappropriately located schemes that are not functionally tied to the data centre. For this reason, we

suggest co-location is defined as where at least 70% of the energy output is required for the co-located use (i.e. the data centre).

198. Do you think the renewable energy generation thresholds under Section 15 of the Planning Act 2008 for other use types of projects should be increased, or should this be limited to projects co-located with data centres? Yes/No

No.

a) Please provide your reasons.

For the same reasons given in answer to Q.196. This question (198) is also poorly phrased; for clarity's sake we say the 100 MW generating capacity threshold should not be increased, either for data centres or other uses.

199. What benefits or risks do you foresee from making this change? Please provide you reasons.

Again, as we have outlined at Q.196, the main risk we foresee are delays to consenting due to 'overwhelm' in the local planning system. However, this is not 'black and white' as large infrastructure developments in both the TCPA and NSIP regimes are challenging to handle by resource-constrained planning authorities.

## Annex B: Viability

### 200. Would you support the use of growth testing for strategic, multi-phase schemes?

Partly agree

CPRE would welcome moves to increase plan policy compliance as mentioned on p.111 of the consultation paper. Potentially growth testing could play a role in this, if it is clear for example that increased planning (Section 106) agreement revenue can be sought if revenues from on-site sales exceed expectations. However, the consultation is not clear on what is meant by 'growth'.

Development, especially when speculative, is a risky business and cannot be 100% derisked. Developers should not over pay for land and applicants should always bring forward proposals in line with local plans that deliver against contributions specified in adopted spatial plans and the scope for renegotiation at the decision-making stage should be limited, to resolve the problem of excessive renegeing on agreed social and environmental conditions. The NPPF has allowed a route for poor planning outcomes for too long, and the revisions need to deliver genuinely sustainable development in economic, social and environmental terms.

### 201. Would you support the optional use of growth testing for regeneration schemes?

Partly disagree

Standardised inputs to viability assessments provide a consistent framework and enable more certainty. in terms of growth testing, as mentioned above, contributions should be able to be increased (as opposed to reduced) if the market picks up. This reflects the fact development can take years to complete.

### 202. Do you agree greater specificity, including single figures, which local planning authorities could choose to diverge from where there is evidence for doing so, would improve speed and certainty?

Partly disagree

The NPPF has always been viewed as a 'developer's charter' because it has weakened the powers of local planning authorities due to the prioritisation of developer returns in the deciding of development and it has resulted in falsely high expectations. An assumed 15-20% of gross development value is extremely high when compared to any other economic activity and it has falsely inflated house prices. When developers have overpaid for land, society misses out on affordable housing and other needed infrastructure needed to make development sustainable. A lot of developer profit comes from 'flipping

farmland to housing land’ and extracting value at this stage. The applicant is often not the actual developer. The government through the NPPF policy needs to allow the ultimate developer of houses and indeed the relevant local authority to recoup some of the value for social and environmental goods. CPRE recommends a that a lower value of no more than 10% should be the starting point. In fact, the government may wish to allow the public sector to invest in housing, especially affordable ones to make up for affordable homes lost in perpetuity due to the ‘Right to Buy’.

### **203. Are there any site types, tenures, or development models to which alternative, lower figures to 15-20% of Gross Development Value might reasonably apply?**

The government should incentivise the reuse of brownfield land, while not reducing policy expectations for mixed communities or affordable, particularly social, housing. Brownfield completion performance has slumped since the introduction of the NPPF. This downward completion trend can be observed in Figure 3 of the following research [1]. It shows a decline since Regional Spatial Strategies were abolished.

[1] [https://www.cpre.org.uk/wp-content/uploads/2021/11/Nov-2021\\_CPPE\\_Recycling-our-land\\_brownfields-report.pdf](https://www.cpre.org.uk/wp-content/uploads/2021/11/Nov-2021_CPPE_Recycling-our-land_brownfields-report.pdf)

### **204. Are there further ways the government can bring greater specificity and certainty over profit expectations across landowners, site promoters and developers such that the system provides for the level of profit necessary for development to proceed, reducing the need for subjective expectations?**

Yes, in recent years Homes England has expanded its involvement in bringing forward large development sites – on greenfield as well as brownfield sites as was its historic role. From this there is a major opportunity to share learning on the impact of development costs and private developer profit margins in delivering large schemes. CPRE recommends that MHCLG and Homes England produce regular (at least annual) reports on lessons learnt from schemes that Homes England has supported.

CPRE believes local planning authorities need adequate power to refuse unviable speculative applications, to better concentrate effort on reusing brownfield sites and green fields allocated in local plans. Brownfield sites (including windfall brownfield sites not allocated in plans) are often centrally located and help to reviving existing places, and sites allocated in plans have been objectively assessed and ranked as the more sustainable sites in the context of policy compliance and favourable environmental outcomes.

205. Existing Viability Planning Practice Guidance refers to developer return in terms a percentage of gross development value. In what ways might the continued use of gross development value be usefully standardised?

District valuers ought to fairly attribute value to development as developers often with their own surveyors use metrics to game viability assessments to appear that development is unviable and this is leading to poor planning outcomes.

A major issue with the use of internal rate of return or return on capital employed (referred to in the consultation paper) is that there is no single accepted definition of either term, with different firms factoring in costs and profits based on differing underlying assumptions. CPRE recommends that guidance should be produced that provides a transparent and widely accepted definition of the return on investment expected that should be followed in all cases, and that the level of return is stated as early as possible in the call for sites or application submission stage.

206. Do you agree there circumstances in which metrics other than profit on gross development value would support more or faster housing delivery, or help to maximise compliance with plan policy?

Strongly disagree

For the reasons explained above, CPRE thinks the circumstances in which metrics other than profit on gross development value should be used to support faster housing delivery, or to maximise compliance with plan policy should be limited or, at the very least, based on transparent and commonly agreed definitions. Too much time is wasted in the planning process due to developers appealing reasoned refusal by local planning authorities. Developers ought to develop brownfield sites and allocations in local plans as a priority.

When considering how to achieve faster development, new research undertaken by the University of Reading and Lyon CPT, supported by CPRE, explored how time is used in the development pipeline. The research explores nine case studies, including one showing the entire development pipeline of a project in southern England, from landowner permission to the end of build-out. Please see [1]. This shows delay is often related to revisions by developers to proposals part way through the decision-making stage.

The government seems to have lost sight of the real reasons for development delay. Of course, it is important that developers achieve an adequate return, but there is a difference of opinion between what is reasonable and the hope value that speculators received. This report [2], evidenced that brownfield sites are on average built out more than six months quicker than greenfield once they have planning permission. Small brownfield sites are particularly important in countryside areas: they

are key to increasing the supply of new housing and can play an important role in maintaining the vitality of rural communities.

[1] <https://www.cpre.org.uk/resources/timelining-the-pipeline-housing-development-end-to-end/>

[2] <https://www.cpre.org.uk/resources/brownfield-comes-first-2/>

207. Are there types of development on which metrics other than profit on gross development value should be routinely accepted as a measure of return e.g. strategic sites large multi-phased schemes, or build to rent schemes?

Community-led development, and those that focus on affordable homes, particularly social tenures should be encouraged through flexible viability policies. Larger sites should be broken down into deliverable parts and smaller and medium developers promoted to build in line with overarching master plans in line with the Letwin Inquiry recommendations [1].

[1] <https://www.gov.uk/government/publications/independent-review-of-build-out-final-report>

208. Do you agree that guidance should be updated to reflect the fact a premium may not be required in all circumstances?

Strongly agree

Consistent with above comments, CPRE believes that landowners are selling land at a too high value expecting to extract value when residential consent is established. Therefore, in answer to a), there are no circumstances where a premium should be valid in policy terms. It is only worth an amount that includes the cost of development with the required developer contributions to fully comply with local plan policy requirements.

209. Do you agree that extant consents should not be assumed to be sufficient proof of alternative use value, unless other provisions relating to set out in plans are met?

Strongly agree

It is right that Planning Practice Guidance should sets out benchmark land value, limited to those uses which would fully comply with up-to-date development plan policies, including any policy requirements for contributions towards affordable housing. CPRE agrees that the outcome should be for plan-makers to continue to be able to refer to alternative use values where these may be informative, whilst being able to disregard them where they do not have a bearing on real-world land transactions.

**210. If extant consents were not to be assumed as sufficient proof of alternative use value, should this be at the discretion of the decision-maker, or should another metric (e.g. period of time since consent granted) be used?**

CPRE believes this should be at decision maker discretion.

**211. What further steps should the government take to ensure non-policy compliant schemes are not used to inform the determination of benchmark land values in the viability assessments that underpin plan-making?**

CPRE recommends that there should be publicly available monitoring of large housing schemes including key information such as provision of planning gain, to help local authorities and communities identify which schemes have succeeded in compliance with policy and which have failed to do so. Longer term, the government needs an NPPF that stops non-policy compliant schemes being consented. Within this, we support the proposal (p.115 of the consultation paper) to provide residual land values for schemes but believe this should form part of a wider systematic programme of development monitoring.

**212. Do you agree that the residual land value of the development proposal should be cross-checked with the residual land values and land transaction data of comparable schemes and/or the subject site; to help set the viability assessment in context.**

Strongly agree

England needs a fairer, more transparent, and accountable approach to development viability to ensure strategic local plans are promoted ahead of speculative development, which is the least sustainable and unpopular form of development.

## Annex C: Reforming Site Thresholds

### 213. Do you agree that a 2.5 hectare threshold is appropriate?

Partly disagree.

As CPRE made clear in its response to the earlier working paper, any expansion of the medium site category raises a wider concern about the steady loss of democratic oversight in planning decisions. CPRE did not support the automatic inclusion of schemes over 10 units within a national scheme of delegation, and argued that sites above that level should still be capable of being referred to committee where there are significant local concerns. That concern remains.

In this respect, and whilst CPRE supports measures generally to help SME developers, we are concerned that allowing up to 49 homes on 2.5 hectares, even if intended to support that aim, would equate to under 20 dph and risks normalising low-density development. This would risk normalising low densities, particularly in suburban and rural areas, and could encourage land-hungry layouts that increase pressure on the countryside. If a medium category is introduced, it should be accompanied by a clear expectation of efficient use of land, with densities reflecting local character and accessibility, not simply the availability of land. It also needs robust anti-gaming safeguards so larger schemes cannot be split into multiple “medium” parcels to benefit from easements,

There could be a significant landscape, visual, ecological, water management, among other environmental harms impact arising from medium sized thresholds, individually, and certainly when considered collectively. It is important that all development is properly considered in its locational context and that it achieves at least a 10% biodiversity net gain in line with the requirements of the Environment Act, 2021 targets. The government should not introduce site thresholds that would make the planning system a blunt instrument, weakening planning authority powers and leading to more poor planning outcomes. We were promised change, and this should ensure positive economic, social, and environmental change.

### 214. Do you agree that a unit threshold of between 10 and 49 units is appropriate?

Partly disagree.

For similar reasons, although CPRE support measures to help SME developers, a 10 to 49 unit range is too broad and risks treating very different forms of development as though they raise the same planning issues.

Schemes at the upper end of that range can be substantial in many suburban and rural areas, with real effects on local character, infrastructure and community confidence, and should not be assumed to warrant reduced scrutiny simply because they fall within a “medium” category. In this respect, and as set out within our original response to the working paper, we believe that sites above 10 units should

be triaged by the Head of Planning and Chair of the planning committee and referred to committee if there are significant local concerns.

**215. Do you foresee risks or operability issues anticipated with the proposed definition of medium development? Yes/No.**

Yes.

**216. If so, please explain your answer and provide views on potential mitigations.**

The main risks are operability and “gaming”, with larger schemes split into multiple “medium” parcels to benefit from easements, and with the 2.5 hectare cap encouraging low-density, land-hungry layouts in suburban and rural areas. There is also a risk of confusion and inconsistency in how the new category is applied across plan-making and decision-taking, particularly where sites are phased, in single ownership, or brought forward through multiple applications.

**217. Do you have any views on whether the current small development exemption should be extended to cover a wider range of sites – indicatively to sites of fewer than 50 dwellings, or fewer than 120 bedspaces in purpose built student accommodation?**

CPRE does not believe it should be extended to the higher level of 50 dwellings.

**218. If the exemption were to be extended, do you have any views on whether the development of 120 purpose-built student accommodation bedspaces is an appropriate equivalent to a development of 50 dwellings for the purposes of the levy exemption? a) Please provide your reasons.**

CPRE notes that although the development size is similar, consideration of other specialist housing needs would be more appropriately set out in policy HO9.

**219. If the exemption were to be extended, do you have any views on whether the exemption should be based solely on the existing metrics (dwellings/bedspaces) or whether there should also be an area threshold.**

No comment

220. If you do have views on possible changes to the small developments levy exemption, please specify the potential impact of the possible change of the levy exemption on people with protected characteristics as defined in section 149 of the Equality Act 2010. 221) What do you consider to be the potential economic, competitive, and behavioural impacts of possible changes to the levy exemption? Please provide any evidence or examples to support your response.

No comment

221. What do you consider to be the potential economic, competitive, and behavioural impacts of possible changes to the levy exemption? Please provide any evidence or examples to support your response.

No comment

222. Do you agree with the proposal to extend the Permission in Principle application route to medium development?

Partly disagree

CPRE strongly supports brownfield development and practical support for SME builders but it does not consider extending Permission in Principle to medium development to be a proportionate way of achieving that aim. Schemes of up to 49 homes can have significant effects on access, landscape, drainage, nature, infrastructure and local character, particularly in suburban and rural areas. At that scale, the principle of development should not be lightly separated from proper local scrutiny.

Our concern is that this would further erode democratic oversight by reducing meaningful consideration of whether a site is suitable in the first place, before the full implications are understood. Speed and simplicity should not come at the cost of good planning.

223. Do you have views about whether there should be changes to the regulatory procedures for these applications, including whether there should be a requirement for a short planning statement?

Yes, if permission in principle is extended to medium development, the minimum information requirements need tightening so decisions are properly informed and locally accountable. As a minimum, this should include a mandatory planning statement which sets out how the proposal fits with the development plan and any settlement strategy, alongside basic constraints and impacts. This should be consulted upon to allow meaningfully public scrutiny.

## Public Sector Equality Duty

We would like to hear about any potential impacts of any of the above proposals on businesses, or of any differential impact on persons with a relevant protected characteristic as defined by the Equality Act 2010 compared to persons without that protected characteristic, together with any appropriate mitigation measures, which may assist in deciding final policy approaches in due course.

224) Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic?

No comment

a) If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how.

225) Is there anything that could be done to mitigate any impact identified?

No comment