

## Consultation Response: National Planning Policy Framework

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March 2026

The UK Green Building Council represents the voice of the UK's sustainable built environment industry. We are a charity powered by more than 600 members from banks, large estate owners, housebuilders, and manufacturers to innovative startups, universities, local councils and government departments - all working to transform the built environment in the face of the climate, nature and cost-of-living crises.

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The scale of the climate and nature crisis, rising health inequalities and growing pressures on communities demands a planning system that is ambitious, coherent and firmly rooted in the long-term public interest. Planning must shape places that are climate resilient, nature-rich, healthy and genuinely affordable. The draft National Planning Policy Framework (NPPF) goes some way to improving this, but leaves gaps in key areas crucial to deliver the development we need.

We welcome several aspects of the draft NPPF. The clearer statement of the purpose of planning, stronger support for Local Plans, improved clarity on design, transport and viability, encouragement of higher-density development within settlements, and a more structured framework are all positive steps which provide a more usable and transparent system.

However, these improvements are significantly undermined by the cumulative weight of caveats and the strengthened presumption in favour of development within decision-making. A genuinely rules-based system must be capable of refusing proposals which fail to meet clear standards. In this draft, strong policies are diluted by qualifying language or exemptions which weaken their effectiveness. This risks creating a framework that appears streamlined and transparent but is in practice permissive and less able to secure high-quality, sustainable development.

While consistency and certainty are important, local authorities must retain the ability to respond to local evidence and circumstances – particularly given their statutory duties on climate change and the escalating risks of flooding and overheating. The removal of the sequential test for surface water flooding and limitations on higher standards represent steps backwards at a time when stronger adaptation and mitigation measures are urgently required. At the same time, the draft contains little articulation of how communities will meaningfully shape decisions, or how planning will actively promote health, wellbeing and long-term resilience.

The final version of the NPPF must ensure the planning system is not reduced to a mechanism for accelerating permissions, but strengthened as a tool for delivering sustainable development in the fullest sense – aligned with the Climate Change Act, the Environment Act and wider commitments. This consultation presents an opportunity to secure that alignment. We hope our response across the ten chapters most relevant to our work and mission will assist in refining the framework so it genuinely enables climate-safe, nature-positive, and healthy communities for the decades ahead.

## Summary of chapters [UKGBC have responded to those highlighted]

### Chapter 2 - Plan-Making Policies

- Proposes updated policies on how local plans should be prepared under the revised framework.
- Focuses on clearer expectations for spatial strategies, settlement boundaries and plan content.
- Seeks views on transitional arrangements and how local planning authorities should adopt the new framework.

### Chapter 3 - Decision-Making Policies

- Outlines revised policies governing how planning applications should be decided.
- Seeks views on clarifying the role of planning vs other regulatory regimes (e.g., building regs), enforcement, use of development orders, and Article 4 directions.

### Chapter 4 - Achieving Sustainable Development

- Introduces a new spatially based 'presumption in favour of sustainable development.'
- Sets out principles for development within and outside settlements to steer decision-making.
- Proposes clearer direction on when development should be approved or refused.

### Chapter 5 - Meeting the Challenge of Climate Change

- Updates policies relating to climate resilience and mitigation.
- Ensures the planning system aligns with climate goals (e.g., low-carbon, adaptive development).
- Adjusts greenhouse gas considerations, energy use and resilience to climate impacts.

### Chapter 6 - Delivering a Sufficient Supply of Homes

- Proposes changes to strengthen housing delivery policies.
- Includes a mandatory standard method for assessing housing needs to ensure homes are planned for locally.
- Seeks views on how to meet housing need and remove barriers to housing supply.

### Chapter 7 - Building a Strong, Effective Economy

- Addresses planning policy to support economic growth, employment and infrastructure.

- Includes policy support for commercial development, modern sectors (e.g., data centres, laboratories, advanced manufacturing) and the wider economy.

#### **Chapter 8 - Ensuring the Vitality of Town Centres**

- Updates guidance on town centres, retail and community facilities.
- Aims to keep town centres vibrant and resilient.

#### **Chapter 9 - Supporting High Quality Communications**

- Policy on digital and communications infrastructure – ensuring connectivity is delivered via planning.

#### **Chapter 10 - Securing Clean Energy and Water**

- Policies to support clean energy infrastructure (e.g., renewables, water infrastructure).
- Stronger framing for infrastructure delivery for energy and utility needs.

#### **Chapter 11 - Facilitating the Sustainable Use of Minerals**

- Sets out updated minerals planning policies, including:
  - A more restrictive position on coal, oil & gas extraction.
  - New policy on critical and growth minerals for net-zero transition and national security.

#### **Chapter 12 - Making Effective Use of Land**

- Proposes policies to encourage efficient land use:
  - Support for urban intensification and brownfield development.
  - Minimum densities in well-connected locations.
  - Land release mechanisms and thresholds.

#### **Chapter 13 - Protecting Green Belt Land**

- Sets out revised protections for Green Belt, clarifying when release or development may be appropriate (e.g., in sustainable locations).

#### **Chapter 14 - Achieving Well-Designed Places**

- Updates design policies to raise quality expectations.
- Encourages good urban design and placemaking standards.

#### **Chapter 15 - Promoting Sustainable Transport**

- Emphasises linkages between transport and land-use decisions.
- Encourages active travel, accessibility, and integration of land use & transport planning.

#### **Chapter 16 - Promoting Healthy Communities**

- Policies to support health outcomes through planning (e.g., access to services, green space).

#### **Chapter 17 - Pollution, Public Protection and Security**

- Strengthens policies to address pollution, safety and risks in planning.

#### **Chapter 18 - Managing Flood Risk and Coastal Change**

- Reframes flood risk policies in a single chapter with updated requirements.
- Clarifies sequential tests and coastal risk planning.

#### **Chapter 19 - Conserving and Enhancing the Natural Environment**

- Updates policy on nature recovery and environmental integration in planning.
- Discusses biodiversity net gain requirements and environmental safeguards.

#### **Chapter 20 - Conserving and Enhancing the Historic Environment**

- Policies to retain and enhance heritage assets within planning decisions.

## Chapter 2: Plan-making policies

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

Strongly agree, partly agree, neither agree nor disagree, **partly disagree**, strongly disagree.

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

We recognise the value of avoiding unnecessary duplication of national decision-making policies where this improves clarity, consistency and efficiency in plan-making.

However, PM6(1c), as currently drafted, risks being interpreted as a ceiling on local ambition rather than a mechanism for streamlining policy. Preventing local plans from duplicating or modifying national policies must not constrain local authorities from responding to distinct environmental, climate, health and place-based challenges. There is a particular concern that the combined effect of PM6(1b) and PM6(1c) limits the ability of local authorities and Mayoral authorities to set a positive, locally determined vision for their areas. National policy should set a strong minimum standard, but local plans must retain the ability to go further where justified by evidence and viability.

We recommend strengthening expectations around meaningful community engagement. Engagement should begin at the earliest stages of plan preparation, shape priorities and site allocations, and continue through to examination. A more explicit commitment to participatory plan-making would improve legitimacy, reduce conflict and support delivery. UK Green Building Council's forthcoming Regenerative Places Framework will provide practical guidance on how participatory approaches can be embedded.

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

Strongly agree, partly agree, neither agree nor disagree, partly disagree, **strongly disagree**.

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

We support the aim of achieving national consistency, but PM13 must continue to allow local authorities to set higher standards where justified and viable, within clear parameters. National Building Regulations should act as a minimum baseline, not a ceiling.

Local authorities play a crucial role in responding to specific climate, nature, health and resilience challenges. To remove their ability to set locally-evidenced

**Commented [KG1]: PM6 General Principles for Plan Making**

- This replaces paragraph 16 of the current Framework, and sets out principles for the preparation of all types of plan: that they should only address matters and include policies necessary and relevant to the plan being prepared, should be informed by environmental assessment where legally required, and be informed by positive community and stakeholder engagement
- It also seeks to prevent repetition or modification of NDMPs in Local Plans (PM6(1c): "Not duplicate, substantively restate or modify the content of national decision-making policies unless directed by other policies in this Framework". We have expressed concerns about this in relation to climate change (eg energy efficiency) and lack of local autonomy. PM6(1B) says to "only include policies which extend beyond site or location-specific requirements where these are necessary and where plan makers consider there is a clear and justified reason for inclusion". How can local leaders still be ambitious for their area in their local plans if NDMPs act as a ceiling on what can be done? And how can they "engage positively with communities" on issues where the NPPF and NDMP rule out any deviation from national policy or even local plans articulating policy beyond site specific issues?
- We support the NPPF's encouragement of data standards (PM6(1f))
- PM6(1d) says that plan-makers should "engage positively with communities and stakeholders at appropriate points" - this is fine but misses the opportunity to be more positive about what engagement might look like

**Commented [KG2]: PM13: Setting standards**

- Clarifies the circumstances in which it may be appropriate to set five local standards in development plans
- Limits quantitative standards to just infrastructure provision, affordable housing, parking, design/placemaking
- Rules out anything that replicates building regulations apart from accessibility standards and water efficiency in areas where there is water stress
- Also rules out anything on construction or internal layout which "are best left to the market to determine"
- MHCLG will use a statutory instrument to prevent local energy efficiency standards
- We are concerned at the restrictions on local ambition and democratic control (see introduction)

**Commented [JW3]:** should we change this to where viable?

standards would weaken ambition and restrict innovation at a time when stronger action is needed.

We therefore recommend that Government co-designs a consistent national framework with industry, communities and local authorities, setting out where and how local authorities can go further, faster within clear parameters. This would ensure clarity and predictability while still enabling councils to go further where justified, evidenced, viable, and consistent with local priorities. This approach maintains consistency without constraining local leadership or undermining climate objectives. It also allows for innovation (such as community-led, or developer-led regenerative housing schemes) which can then lead the way for adoption by wider industry over time.

**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?**

We are concerned by the reduced emphasis on community participation and locally developed shared visions. The planning system functions best where communities are engaged early, understand trade-offs, and help shape priorities for growth, regeneration and environmental protection. Stronger national expectations around participatory plan-making would support legitimacy and long-term delivery. UK Green Building Council's forthcoming Regenerative Places Framework will provide practical guidance on how participatory approaches can be embedded.

We also consider that the plan-making framework should more clearly support a proactive use of existing derelict buildings, providing local authorities with both policy backing and adequate resourcing to pursue this approach effectively.

**Commented [KG4]:** BRE obviously concerned as this would also apply to non-dom buildings and many local authorities specify a particular BREAM level for commercial buildings - do you think we need to say this directly?

**Commented [KG5]: •PM5 Neighbourhood plans**

•This removes lines from the current NPPF on neighbourhood planning giving "communities the power to develop a shared vision for their area" and that they "can shape, direct and help to deliver sustainable development", as well as removing that "the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area". Now less ambitious and more functional documents (but see policy S6 on housing still needing to be consistent with neighbourhood plan).

## Chapter 4: Achieving Sustainable Development

Summary of UKGBC Position Across Chapter 14	
The NPPF must ensure that sustainability is demonstrable and measurable – not assumed through location alone.	
Broadly support	Recommended strengthening
<ul style="list-style-type: none"> <li>• Strategic spatial planning</li> <li>• Urban-first hierarchy</li> <li>• Brownfield prioritisation</li> <li>• Densification in appropriate locations</li> <li>• Clarity in policy application</li> </ul>	<ul style="list-style-type: none"> <li>• Definition of sustainable development</li> <li>• Explicit environmental limits</li> <li>• Climate resilience guardrails</li> <li>• Natural capital assessment</li> <li>• Retrofit prioritisation</li> <li>• Protection for high-value ecosystems</li> <li>• Clear weighting of environmental considerations</li> </ul>
We broadly support the direction of travel in Chapter 14, particularly the emphasis on strategic planning and an urban-first approach. However, the framework would be strengthened by clearer definitions, stronger environmental guardrails and explicit recognition that sustainability must be demonstrable and measurable, not assumed through location alone.	

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

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

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

We support the proposed move toward a more strategic approach to spatial planning and the emphasis on improvement of the environment in a way which promotes a sustainable pattern of growth. We also welcome the inclusion of policies which aim to mitigate climate change.

Planning at a broader geography is essential to address climate mitigation, climate resilience and nature recovery effectively, as these operate across administrative boundaries. Strategic planning provides an opportunity to align housing delivery with sustainable transport, coordinate green infrastructure and Local Nature Recovery Strategies, and take a catchment-scale approach to flood risk.

However, to be effective, spatial strategies must explicitly integrate climate resilience, natural capital considerations and environmental limits. Strategic planning should strengthen environmental safeguards, not create pathways for land release that undermine long-term sustainability objectives.

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

**Commented [KG6]:** The proposed spatial strategy approach aims to:

- Provide a clear, plan-wide framework for where growth should occur.
- Support coordinated decision-making across different parts of the plan and local authority boundaries.
- Link settlement boundaries or criteria with development management expectations.

However, from a sustainability perspective:

- The draft could do more to explicitly integrate **climate mitigation and adaptation outcomes** (e.g., directing growth away from high flood risk areas or heat islands).

- It should be clearer on how spatial strategies will advance **nature protection, ecological networks and wellbeing outcomes**, beyond housing delivery and infrastructure coverage.

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

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

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

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

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

We support the proposed locational hierarchy directing development towards existing settlements, brownfield land and areas well connected by sustainable transport. This reflects an appropriate sustainability principle and provides clarity for decision-makers.

However, we are concerned that the revised approach risks conflating location with sustainability. Development in a well-located area is not inherently sustainable if it performs poorly in terms of carbon emissions, climate resilience, biodiversity or infrastructure capacity. The draft would benefit from a clearer definition of sustainable development, including explicit reference to environmental limits and long-term resilience.

We are also concerned that narrowing the grounds for refusal may reduce local authorities' ability to address climate risk, water stress and nature impacts. Sustainable development must remain demonstrably sustainable in practice, not simply assumed on the basis of geography.

**37) Do you agree to the proposed approach to development within settlements?**

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

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

We support prioritising development within existing settlements. Urban regeneration and appropriate densification can reduce transport emissions, optimise infrastructure use and protect greenfield land. We also support upward extensions where appropriate, particularly where these improve the energy performance and climate resilience of existing buildings. Alongside brownfield prioritisation, there should be clear support for retrofit and reuse, ensuring whole-life carbon considerations are central to delivery.

However, intensification must be undertaken carefully. Existing settlements are not automatically resilient to further growth, particularly in areas at risk of overheating, surface water flooding or infrastructure strain. Brownfield land can also hold biodiversity or community value and should not be treated as inherently low value, and should have assessment methods in place to ensure no valuable land is released. We are concerned that the test for refusal as 'likely to have an

**Commented [KG7]: S3: Presumption in favour of sustainable development**

Introduces the change in policy applying to it development within and without settlements (see next two sections). This is not quite a brownfield first policy as the overall policy seeks to expand the boundaries of settlements plus also the development around stations policy and Grey Belt more generally (both speculative Grey Belt applications plus Grey Belt designations).

The intention is to signal *clearly* that development should be steered to **appropriate and sustainable locations** (e.g., within settlements on suitable land first) and only permitted outside those areas where specific criteria are met.

The revised approach is designed to **increase delivery in locations judged to be sustainable** (settlements, brownfield land, transport-connected sites), while **reducing scope for arguing sustainability case-by-case in less favoured locations**.

**Commented [KG8]:** For development inside settlements, the draft NPPF shifts toward a **plan-led, sustainability-focused approach** where development that sits within defined boundaries and meets locational and design criteria should generally be supported, while still requiring balance against local environmental and infrastructure considerations.

unacceptable impact' is too vague and risks being inconsistently applied as it's unclear how this is determined and balanced against 'public benefits'.

**38) Do you agree to the proposed approach to development outside settlements?**

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

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

We support the principles of directing most development to settlements and limiting development in the countryside, but while some development outside settlements may be appropriate, stronger safeguards are required. The countryside and undeveloped land provide essential functions including food production, carbon sequestration, biodiversity recovery, flood mitigation and public wellbeing. These functions should be given appropriate weight in decision-making.

We recommend that development outside settlements should only proceed where it can clearly demonstrate sustainability, including biodiversity protection, natural capital considerations and climate resilience. Conversion of existing buildings, as well as brownfield development should be prioritised before land outside of settlements is released. Greater clarity is needed on how environmental and economic factors are to be balanced to avoid overly permissive interpretation.

**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?**

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

**a) Please provide your reasons.**

As above.

**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 agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

**a) Please provide your reasons, including any evidence that this policy would lead to adverse impacts on Gypsies and Travellers and other groups with protected characteristics.**

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

Strongly agree, partly agree, neither agree or disagree, partly disagree, strongly disagree.

**Commented [KG9]:** Development outside settlements is **not prohibited, but is more tightly controlled**. It should only be supported where there is a strong justification grounded in local need, sustainability outcomes and compliance with wider national and local planning policies – ensuring that countryside, landscape and environmental quality are protected.

**Commented [KG10]: S6: Neighbourhood plans and the presumption**

This very slightly rewords para 14 in the current NPPF - para 14 (and the new S6) tilt the presumption in favour of development towards rejection if in conflict with a neighbourhood plan if the plan is less than five years old and it includes a five-year housing supply. Change in wording: "the neighbourhood plan contains policies and allocations to meet its identified housing requirement".

In other words:

- A neighbourhood plan that supports housing in principle but **doesn't allocate enough sites** is less likely to block development.
- A neighbourhood plan that **actively plans for housing delivery** keeps its protection.

Does lean towards delivery - reducing the ability of neighbourhood plans to block housing without planning for it - shifts slightly towards:

- **"plan for growth locally or lose some protection"** rather than
  - neighbourhood plans as a shield against development".

**a) If not, please provide your reasons**

We agree that neighbourhood plans should contribute to housing delivery, but this must be supported by adequate technical capacity and clear resilience testing. Allocations should take account of flood risk, water stress, infrastructure capacity and long-term climate impacts to ensure development is deliverable and sustainable.

Housing targets must be met within environmental limits. Without this, there is a risk of allocating land that increases climate risk or creates long-term liabilities for communities and public authorities.

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## Chapter 5: Meeting the challenge of climate change

<b>Summary of UKGBC Position on Chapter 5</b>	
Overall, while Chapter 5 signals stronger climate intent, its effectiveness will depend on restoring measurable tools, clarifying standards and ensuring that climate alignment is demonstrable in practice rather than aspirational in wording.	
<b>Broadly support:</b>	<b>Recommended strengthening:</b>
<ul style="list-style-type: none"> <li>• Stronger recognition of planning's role in mitigation and adaptation.</li> <li>• The consolidation and expansion of mitigation policy in CC2.</li> <li>• The broadened scope of adaptation in CC3, including overheating and nature-based solutions.</li> <li>• A spatial approach that reduces transport emissions and protects natural carbon sinks.</li> </ul>	<ul style="list-style-type: none"> <li>• Explicit legal alignment with the Climate Change Act within the NPPF.</li> <li>• Clear definitions and measurable criteria for "radical reductions" in emissions.</li> <li>• Mandatory integration of carbon accounting in plan-making and decision-making.</li> <li>• The ability for local authorities to set higher energy standards where justified.</li> <li>• Enforceable adaptation benchmarks and consistent oversight of flood resilience measures.</li> <li>• Reform of viability processes to prevent climate ambition being undermined on cost grounds.</li> </ul>

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

Strongly agree, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.

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

We agree with the strengthened recognition of the planning system's role in tackling climate change and welcome the clearer framing of mitigation and adaptation within policy CC1. However, the policy lacks sufficient clarity and enforceable mechanisms to ensure meaningful delivery.

While draft policy CC1 acknowledges the role of carbon assessment in plan-making, it limits this primarily to spatial strategy and site allocation decisions. This overlooks key sources of territorial emissions, including the qualitative and design aspects of development, embodied carbon, infrastructure provision and long-term energy demand. The policy reference to achieving 'radical reductions' in

greenhouse gas emissions is welcome, but without definition, metrics or procedural requirements, it risks being aspirational rather than operational.

We recommend that alignment with the Climate Change Act 2008 be embedded explicitly within the NPPF, rather than dispersed across legislation and footnotes. Planning policy should clearly state that plan-making and decision-making must align with statutory carbon budgets trajectory.

The welcome ambition of CC1 contrasts with the limits set in PM13 restricting local authorities' ability to set standards above national building regulations. The Climate Change Committee has identified planning as a critical lever for delivery, and policy should enable local authorities to achieve this within a clear and evidence-based framework if the planning system is planning system is expected to contribute meaningfully to climate change.

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

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

**a) If not, what additional measures could be taken to ensure climate change mitigation is given appropriate consideration?**

We support the consolidation of mitigation policy within CC2 and welcome its broader framing. In particular, the explicit consideration of location, reuse of buildings and materials, travel demand reduction, district heat networks, and the protection of natural carbon sinks - all of which strengthen the scope of mitigation beyond technical building performance alone.

However, there is an inconsistency between this broadened scope and the limitations placed on local authorities' ability to set higher technical standards in PM13. Without clear national benchmarks for operational energy, embodied carbon or whole-life performance, decision-makers lack consistent metrics against which to judge proposals. The removal or restriction of quantifiable mechanisms makes it more difficult to demonstrate alignment with statutory climate obligations.

We recommend meaningful carbon accounting guidance to align with the recommendations from the Climate Change Committee that the planning system be comprehensively aligned with carbon budgets and avoid vague terms such as 'contributions'.

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

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

**a) What additional measures could be taken to ensure climate change adaptation is given appropriate consideration?**

**Commented [DS11]:** compliance with the Act suggests statutory targets being embedded within guidance. I think we usually talk about 'alignment' with net zero targets rather than compliance - might be safer wording

**Commented [KG12]:** Key structural changes:

- It creates a **single, consolidated mitigation policy** for decision-making.
- It uses **signposting** to other NPPF chapters (transport, design, energy, nature, minerals), rather than standing alone.
- It moves away from a narrow "energy efficiency of buildings" focus towards a **whole-development mitigation test**.

**Stronger position on fossil fuels**

The new wording: development should *not increase the extraction of fossil fuels* unless in accordance with **policy M5** That is materially stronger than the current NPPF, which is more permissive and ambiguous.

Because M5 is **highly restrictive**, CC2 effectively:

- embeds a **presumption against new fossil fuel extraction**, and
- aligns planning policy more clearly with net-zero objectives.

That is a **real strengthening** of mitigation policy.

**Carbon sinks explicitly protected**

By stating that development should **improve, not damage, natural carbon sinks**, CC2:

**Commented [KG13]: CC3: Adaptation to climate change**

- This policy would also replace paragraph 163 and sets out principles for climate adaptation in planning decisions
- CC3 "goes further than the current Framework by requiring development proposals to consider both current and future climate impacts over the lifetime of the development"
- There are links to other policies, mainly in the flooding chapter around managing risks. Also new mention of wildfires
- Refers to minimise risks from overheating - current NPPF only refers to in relation to Local Plans rather than applications for development

**Commented [KG14]:** Under the draft NPPF, **Policy CC3 sets out national decision-making expectations for how development proposals should address climate change adaptation**. Unlike the current Framework, CC3 requires proposals to consider **both current and future climate impacts over the lifetime of a development** and builds a more consistent adaptation framework into planning decisions.

A **more proactive, evidence-informed and future-focused approach to climate adaptation** in planning decisions. It asks decision-makers and applicants to demonstrate that development proposals have considered key climate risks across the lifetime of th

We welcome the clearer and more forward-looking approach to adaptation in CC3. The broader scope, covering overheating, water scarcity, wildfires, flooding, infrastructure resilience and nature-based solutions represents an improvement on previous policy, reflects a more realistic understanding of the range of climate impacts that developments will face over their lifetime. Also welcome is the emphasis on Sustainable Drainage Systems (SuDS) and requirement for passive design approaches that minimise overheating and green infrastructure.

However, as with climate change mitigation policies, these principles lack enforceable benchmarks and should be underpinned by stronger mandatory mechanisms. In the absence of national adaptation metrics, local authorities may struggle to apply the policy consistently. Clearer guidance, model conditions and measurable criteria would strengthen implementation.

There is also inconsistency with weakening of flood risk policy in the Chapter 18 with proposed removal of the sequential test for surface water flooding which risks undermining the effectiveness of this adaptation framework and increasing long-term vulnerability to climate impacts.

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

Strongly agree, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.

**a) Please provide your reasons**

We welcome recognition of wildfire risk as a helpful starting point but further detail and clarity is needed on when and how such risks should be addressed to ensure consistency of approach. Wildfires pose increasing risks to buildings, infrastructure and natural carbon stores, particularly peatlands, which are among the UK's most significant long-term carbon sinks. There must be clear direction as to how risk is assessed who undertakes the assessment and how it should be balanced against other planning considerations.

UKGBC's climate resilience roadmap recommended policy should ensure that development in high-risk areas incorporates fire-resistant materials, defensible landscaping and appropriate water infrastructure. Risk mapping, evacuation planning and land management practices - such as peatland restoration and rewetting - should also be supported at plan-making stage.

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

Wildfire resilience should be integrated within wider principles of good design, including green infrastructure planning, material selection and long-term asset management.

UKGBC's climate resilience roadmap recommends that fire-resistant materials, defensible spaces, and fire-safe landscaping have been designed in, especially in

high-risk zones, and also emphasises the importance of landscape-level management such as peatland restoration and rewetting.

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

To ensure the planning system delivers climate objectives at the required scale and pace, we recommend:

- Clear legal alignment with the Climate Change Act 2008 within the NPPF itself.
- Phased integration of carbon accounting into both decision-making.
- Retention of local authorities' ability to set higher standards for achieving climate goals where justified and viable.
- Stronger emphasis on retrofit and reuse of existing buildings and materials.
- A reform of viability processes to ensure climate and resilience measures are not routinely diluted on cost grounds.
- Clearer adaptation policy, including consistent enforcement of risk assessment and mitigation.

Planning reform alone will not deliver climate alignment without parallel investment in skills, resources and guidance across local authorities, the Planning Inspectorate and statutory bodies.

Commented [DS15]: phased integration into decision making?

## Chapter 8: Ensuring the Vitality of Town Centres

**88) Do you agree with the proposed changes to policy for planning for town centres?**

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

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

We welcome the strengthened focus on intensification and mixed uses within town centres. Supporting compact, walkable centres aligns strongly with the regenerative places approach championed by UK Green Building Council, which emphasises creating places that restore environmental systems, support community wellbeing and enable low-carbon lifestyles.

To fully realise this ambition, policy should more explicitly embed health and wellbeing outcomes into plan-making and decision-taking, drawing on local health evidence and strategies. It is also essential that communities are meaningfully involved in shaping the future of their town centres, ensuring regeneration responds to locally identified needs and priorities. UK Green Building Council's forthcoming Regenerative Places Framework will provide practical guidance on how participatory approaches can be embedded to deliver inclusive, resilient and locally valued outcomes.

We also recommend strengthening the role of green infrastructure within centres, both to enhance vitality and to deliver measurable health, climate resilience and biodiversity benefits. Aligning town centre policy with national Green Infrastructure Standards and local nature recovery priorities would ensure that regeneration contributes to the statutory ambition that everyone should live within a short walk of high-quality green or blue space.

**89) Do you agree with the approach to development in town centres in policy TC2?**

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

**a) If not, please explain how you would achieve this aim differently?**

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

**91) Do you believe the sequential test in policy TC3 should be retained? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

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

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

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

**Commented [KG16]:** Policy TC1 is fundamentally about **plan-making** – meaning it directs what local plans should contain, rather than how individual planning applications are assessed. The way centres are defined and planned for will directly influence:

- Location of new retail, leisure, cultural and residential development
- Walkable, mixed-use town centre environments
- Planning strategies for high streets, local centres and street frontages

This structured strategy approach replaces ad-hoc policies and seeks to give town centre planning more consistency

## Chapter 12: Making Effective Use of Land

Summary of UKGBC Position on Chapter 12	
Overall, Chapter 12 moves in a positive direction by reinforcing a brownfield-first, urban-focused approach. However, efficient land use must be defined not solely in terms of density, but in terms of long-term environmental performance, resilience and community wellbeing.	
Broadly support:	Recommended strengthening:
<ul style="list-style-type: none"> <li>The prioritisation of previously developed land.</li> <li>Urban intensification as a means of reducing sprawl and transport emissions.</li> <li>Inclusion of typologies such as infill and upward extensions.</li> <li>High-level national design principles to guide densification.</li> </ul>	<ul style="list-style-type: none"> <li>Clearer links between land efficiency and climate, carbon and biodiversity outcomes.</li> <li>Explicit environmental assessment of brownfield sites where appropriate.</li> <li>Stronger safeguards to prevent loss of urban green space and ecosystem services.</li> <li>In-principle support for retrofit and reuse alongside brownfield development.</li> <li>Clearer expectations around infrastructure capacity and climate resilience.</li> <li>Integration of green infrastructure, shading, sustainable drainage and social value within design principles.</li> </ul>

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

Strongly agree, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.

#### a) If not, what further guidance is needed?

We broadly welcome the strengthened emphasis on efficient land use, urban intensification and the prioritisation of previously developed land. Concentrating development within existing settlements can reduce transport emissions, protect the Green Belt and countryside, and make better use of existing infrastructure. When combined with strong design principles, this approach can help create walkable, healthy and resilient places.

However, intensification does not automatically deliver sustainability benefits. Brownfield land is not inherently low value and may support biodiversity, urban cooling, flood mitigation or valued community space. Local Plans should therefore require broader environmental evaluation of brownfield sites, including ecological

#### Commented [KG17]: Key points:

Prioritise previously developed land (brownfield)  
Allocate range of small, medium, large sites (avoiding over-reliance of one type or size of tenure)  
Use design codes/guides for higher-density, better-designed development + set out principles to guide intensification

Policy L1 is designed to steer **plan-makers towards making the most effective use of land** – especially by prioritising brownfield sites, allocating a range of site sizes, and encouraging design-led intensification.

#### From a sustainability/climate perspective:

•✓ It generally *supports* sustainable development by encouraging compact, higher-density, and accessible development patterns.

•⚠ It **lacks explicit sustainability metrics and targets** within the policy itself – meaning its effectiveness depends on how it is implemented alongside other NPPF policies on climate, nature, transport and design.

•⚠ It may create **pressure to develop sites over which the overall environmental impact is unclear** unless complementary mitigation/adaptation requirements are enforced.

In practice, L1 should be **compatible with sustainability goals**, but only if local plans *actively integrate* climate, ecological and social sustainability objectives into how they apply the policy.

assessment where appropriate, to establish baselines so that meaningful uplifts in biodiversity can be required and also ensure that development contributes to a net increase in green and permeable surfaces.

Additionally, the support for brownfield development should be matched with in-principle support for retrofit and substantial reuse of existing buildings to reduce embodied carbon and make effective use of well-connected sites. We also recommend that efficient land use policies are more explicitly linked to climate and environmental outcomes - connecting land efficiency with carbon reduction, energy performance, biodiversity enhancement and climate resilience. Without measurable environmental objectives, land efficiency risks being interpreted narrowly as density maximisation rather than sustainable placemaking.

While density can improve sustainability outcomes, it must be context-specific. Over-intensification risks unnecessary increased embodied carbon (particularly in high-rise typologies<sup>1</sup>), loss of green space and strain on social infrastructure. Efficient use of land must not erode urban nature, shading, cooling capacity or community value.

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

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

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

We agree that prioritising previously developed land is appropriate and necessary to avoid sprawl and protect undeveloped landscapes. However, L2 should provide clearer safeguards to ensure intensification is supported by infrastructure, green space and climate resilience.

Urban densification without corresponding investment in transport, schools, healthcare, utilities and green infrastructure risks undermining long-term sustainability. Efficient land use should therefore be assessed holistically, including infrastructure capacity, climate resilience and biodiversity outcomes.

Criterion 3 should be strengthened to clarify expectations around the role of greenfield land in supporting food security, carbon sequestration, nature recovery and ecosystem services. Where greenfield development is proposed, these functions should be explicitly assessed and weighed.

We support the brownfield-first principle but as above, this should be matched with in-principle support for retrofit and substantial reuse of existing buildings and ensure the overall quantity or quality of green and absorbent surfaces within settlements is not diminished.

**Commented [DS18]:** and to establish baselines so that meaningful uplifts in biodiversity can be required

**Commented [KG19]:** Policy L2 is a **decision-making policy** that sets out how planning applications should be assessed for **efficient land use**. It sits alongside plan-making (L1) and density (L3), but focuses on **development proposals at application stage**.

Promotes types of development that:  
Remediating and regenerating poor land (**clean up derelict, degraded, contaminated or unstable land** are seen positively because they restore land to productive use and address environmental issues)  
Re-use vacant or under-utilised land and buildings (e.g. bringing empty homes/buildings back into use; redeveloping under utilised sites)  
Temporary uses (pop-ups)  
Intensification in built-up areas (above buildings, upwards extensions etc.)

<sup>1</sup> Architect Magazine: With Housing's Carbon Footprint, Density Matters (2020)

**117) Do you agree policy L2 identifies appropriate typologies of development to support intensification?**

Strongly agree, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.

**a) If not, what typologies should be added or removed and why?**

The typologies identified in L2 such as infill development and upward extensions are appropriate and reflect viable routes to increasing density within existing settlements.

Upward extensions present an opportunity to improve building performance at the point of intervention. Policy should encourage retrofit-led intensification with a whole-life carbon approach, improved energy efficiency and cooling measures (roof replacement during extensions offer opportunity to upgrade insulation and ventilation), and low-carbon heating.

As with L1, density must be approached carefully to avoid excessive embodied carbon or loss of nature.

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

Strongly agree, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.

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

We welcome the inclusion of high-level design principles and recognise that the parallel consultation on design and placemaking planning practice guidance is a positive step. However, as currently framed these remain principles rather than firm requirements. Given the scale of development anticipated, this level of ambition should be embedded more clearly in statutory policy and applied consistently across all development, not limited to intensification schemes.

Design expectations should more explicitly integrate climate mitigation, climate resilience and nature recovery as core components of development. Without clear requirements, there is a risk that environmental performance and long-term liveability are treated as optional enhancements rather than fundamental outcomes.

Greater emphasis should also be placed on social value and community infrastructure. Higher density can support walkability and viable local services, but only if accompanied by high-quality public realm, accessible green space and inclusive placemaking. Meaningful community participation must be central to shaping intensification - the forthcoming Regenerative Places Framework from UK Green Building Council will support practical delivery of participatory, place-based regeneration.

**Commented [KG20]:** typologies of development identified in draft Policy L2 (Question 117) as appropriate to support intensification:

- **Infill development** within existing built-up areas
  - **Redevelopment of previously developed (brownfield) land**
  - **Conversion or change of use** of existing buildings (including under-utilised commercial space to residential or mixed use)
  - **Upward extensions** to existing buildings where appropriate
  - **Sub-division of large dwellings** into smaller homes
    - **Estate regeneration and renewal schemes**
  - **Mixed-use redevelopment** in town and city centres
  - **Transport-oriented development** around public transport hubs and corridors
  - **Densification of low-density residential areas**, where this respects local character and design principles

**Commented [KG21]:** Principles suggest that proposals should:

- **Respond positively to local character and context**, including prevailing scale, height, form and grain of development.
- **Optimise site capacity** while maintaining high standards of amenity for existing and future occupants.
- **Provide adequate daylight, sunlight, outlook and privacy**, avoiding overdevelopment.
- **Ensure high-quality public realm and green infrastructure**, including access to open space where appropriate.
- **Promote safe, accessible and inclusive environments**, with good pedestrian and cycle connectivity.
- **Support sustainable transport integration**, particularly in accessible locations.
- **Incorporate climate resilience and environmental performance measures**, consistent with wider NPPF policies on mitigation and adaptation.

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, partly agree, neither agree nor disagree, partly disagree, strongly disagree:

a) Please provide your reasons, particularly if you disagree:

120) Do you agree with the proposed safeguards in policy L2 that allow development in residential curtilages? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree:

a) Please provide your reasons, particularly if you disagree:

121) Do you agree policy L3 provides clear guidance on achieving appropriate densities for residential and mixed-use schemes? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree:

a) If not, please explain how guidance could be clearer?

122) Do you agree with the minimum density requirements set out within policy L3? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree:

a) Please provide your reasons, particularly if you disagree:

b) Could these minimum density requirements lead to adverse impacts on Gypsies and Travellers and other groups with protected characteristics? Please provide your reasons, including any evidence

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, partly agree, neither agree nor disagree, partly disagree, strongly disagree:

a) Please provide your reasons, particularly if you disagree:

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 agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree:

a) Please provide your reasons and preferred alternatives:

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?  
Yes/No

a) If so, how should these locations be defined in a clear and unambiguous way and what should these density standards be?

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

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

128) Do you agree policy L4 provides clear high-level guidance on good design for residential extensions? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

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

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## Chapter 13: Protecting Green Belt land

Summary of UKGBC Position on Chapter 13	
Overall, Chapter 13 moves towards a more structured approach to Green Belt review, but without clearer environmental guardrails and national assessment standards, there remains a significant risk of unintended harm to nature, climate resilience and long-term spatial sustainability.	
Broadly support:	Recommended strengthening:
<ul style="list-style-type: none"> <li>• A strategic, evidence-led approach to Green Belt review.</li> <li>• Retention of strong protections around openness and settlement separation.</li> <li>• Clearer expectations for nature recovery and community benefit within Green Belt policy.</li> <li>• The principle that redevelopment of previously developed Green Belt land can support regeneration and environmental enhancement.</li> <li>• The concept of a Grey Belt category in principle, subject to safeguards.</li> </ul>	<ul style="list-style-type: none"> <li>• A clear, nationally consistent methodology for identifying Grey Belt land.</li> <li>• Explicit integration of biodiversity, ecosystem services, carbon storage and climate resilience into Green Belt assessment and decision tests.</li> <li>• Protection for non-designated land with high natural capital or nature recovery potential.</li> <li>• Stronger safeguards to prevent speculative degradation of land prior to designation.</li> <li>• Clear confirmation that the Golden Rules are non-negotiable and not subject to viability renegotiation.</li> <li>• Stronger alignment between Green Belt release decisions and sustainable transport connectivity.</li> </ul>

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

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

131) Please provide your reasons, particularly if you disagree:

**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 agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

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

The operability of policy GB2 hinges on the clarity of the Grey Belt definition. The concept of Green Belt purposes remains inherently subjective and without a clear and consistent national assessment framework, there is a significant risk of

**Commented [KG22]:** •Policy GB2 sets out how Green Belt land should be reviewed and assessed where authorities are considering changes to Green Belt boundaries through plan-making.

•At a strategic level, the policy:

•Confirms that **Green Belt boundaries should only be altered through the preparation or review of a local plan**, and only where exceptional circumstances are demonstrated.

•Requires authorities to undertake a **systematic assessment of Green Belt land**, considering the purposes of the Green Belt and the relative contribution different parcels make to those purposes.

•Encourages a **sequential and evidence-based approach**, prioritising previously developed land and lower-performing Green Belt parcels before considering release of higher-performing areas.

•Expects sustainability factors – including access to infrastructure, transport connections and the ability to create sustainable communities – to inform decisions about whether land is suitable for release.

•Seeks to ensure that where land is removed from the Green Belt, it supports well-planned, comprehensive development rather than piecemeal proposals.

This strategic assessment must take into account the **five traditional Green Belt purposes**:

- i. Checking the unrestricted sprawl of large built-up areas
- ii. Preventing neighbouring towns from merging
- iii. Safeguarding the countryside from encroachment
- iv. Preserving the setting and special character of historic towns
- v. Assisting urban regeneration by encouraging recycling of derelict and other urban land

inconsistent interpretation, contentious plan examinations and speculative behaviour.

The policy still risks overlooking land with significant natural capital, ecosystem service or future nature recovery value that is not formally designated. There is a critical need for Green Belt land to play a role in nature recovery, carbon sequestration, and climate resilience and these functions should be explicitly embedded in Green Belt assessment methodology.

We also recommend that connectivity and contribution to a low-carbon spatial strategy form part of any assessment. Land that is poorly connected to sustainable transport and services risks entrenching high-carbon patterns of development. A strategic review of Green Belt boundaries must therefore align clearly with climate mitigation and adaptation objectives. A Green Belt fit for the future should not simply be reclassified and released; it should also be actively enhanced for nature, climate resilience and public access.

133) Do you agree with proposals to better enable development opportunities around suitable stations to be brought forward? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree:

a) Please provide your reasons, particularly if you disagree:

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

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

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

We welcome the stronger expectation that development plans should secure tangible benefits for communities and nature from Green Belt land. The clearer link to nature recovery strategies and protected landscapes is a positive step, as is the expectation that plans should consider improving public access.

However, further strengthening is needed. Development plans should explicitly include opportunities for natural flood management, habitat restoration, woodland creation and carbon sequestration within Green Belt areas. As above, Green Belt policy should move beyond protection of openness alone and recognise ecosystem services as part of its long-term purpose.

Local authorities must retain meaningful powers to refuse proposals that would cause biodiversity loss, release stored carbon, increase climate risk or undermine strategic nature recovery objectives. We are concerned that the interaction between housing targets and the presumption in favour of sustainable development may weaken Green Belt protection where local plans are found to be under-delivering. Clearer safeguards are required to ensure that non-Grey Belt Green Belt land cannot be eroded incrementally through the tilted balance.

**Commented [KG23]: GB5: Beneficial uses of Green Belt Land**

- This revises and expands current Framework paragraphs 151 and 152
- The new draft NPPF has a stronger expectation that the development plan should ensure benefits for communities and nature from Green Belt (current NPPF slightly vaguer that should "plan positively to enhance their beneficial use" from para 151)
- This includes contribution to nature recover (as set out in LNRS) plus alongside consideration in current NPPF of opportunities to support the National Forest and community forests, it now also mentions supporting protected landscapes, where these are in a Green Belt area.
- There should also be proposals in the development plan for improving access to green space
- We would like to see natural flood management included in the list of potential benefits
- The Development plan should set out "How the impact of any proposals to remove land from the Green Belt by altering Green Belt boundaries can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land"

**Key points**

- ✓ Allows controlled reuse, extension or alteration of existing buildings.
- ✓ Supports redevelopment of previously developed (brownfield) land – *even in the Green Belt*.
- ✓ Permits some limited local facilities, essential infrastructure and uses that **do not harm openness or purposes**.

✓ Allows "very special circumstances" test when inappropriate but there are clear benefits.

**Nature / biodiversity / climate implications**

- GB5 *does not relax Green Belt protection* – openness and Green Belt purposes remain central.
- It *does* explicitly allow **redevelopment of brownfield land in the Green Belt**; that can be positive for biodiversity if redevelopment secures habitat gains and avoids sensitive features.
- Policies elsewhere in the Framework (nature, climate) still apply – so biodiversity enhancement **can be required as mitigation or enhancement** for permitted development.
  - Climate considerations (e.g., embodied carbon, energy) are not explicit in GB5 but apply through other climate policies (CC2/CC3).

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

Strongly agree, partly agree, neither agree nor disagree, **partly disagree**, strongly disagree.

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

We support the retention of strong tests relating to openness and Green Belt purposes. However, nature and climate considerations are not central within GB6 and GB7 themselves - given the scale of environmental challenges, biodiversity, ecosystem services and carbon storage should be explicitly integrated into Green Belt decision-making tests.

Where redevelopment of previously developed land within the Green Belt is permitted, this should be framed as an opportunity for environmental enhancement, biodiversity net gain, decarbonisation and improved access to green infrastructure.

As in response to previous questions, the Grey Belt definition remains insufficiently precise. Although environmental footnotes have been revised, there is still no standardised national methodology for assessment and no explicit safeguard for land with high nature recovery potential that lacks formal designation. Without clearer criteria, the risk of inconsistent interpretation and dispute remains high.

~~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 agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree:~~

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

**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 agree, partly agree, neither agree nor disagree, **partly disagree**, strongly disagree.

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

We strongly caution against allowing site-specific viability assessments to dilute the Golden Rules for development on Green Belt or Grey Belt land. Climate resilience, energy efficiency, affordable housing and nature restoration requirements should not be treated as negotiable on viability grounds as this risks embedding long-term climate, resilience, and social costs into new development.

**Commented [KG24]:** Sets out *very limited circumstances* under which a boundary amendment may be justified as part of a plan-making exercise:

**Conditions (simplified)**

1. **The site has been identified through a Green Belt assessment** as having limited contribution to the five Green Belt purposes ("grey belt") and
2. **The release is justified by exceptional circumstances**, including a modelling of harms versus benefits.

**Commented [KG25]:** GB7 sets out categories of development which are *not inappropriate* if they do not harm openness or the purposes of the Green Belt, including:

- **Re-use/extension of existing buildings**
- **Replacement dwellings of similar scale**
- **Limited infilling or redevelopment of previously developed land**
- **Essential facilities for outdoor sport, cemeteries, community uses**
- **Limited affordable housing** (in some cases)
  - **Minor expanded homes for disabled people**
  - **Utilities and infrastructure** where essential and proportionate

**Commented [KG26]:** Q139 is about *when (if ever)* developers should be allowed to argue that Green Belt "Golden Rules" are unviable.

Lays out three circumstances for when viability assessments can be used instead of golden rules (?): **Previously Developed Land** can have **abnormal costs** (decontamination, demolition, constraints) that justify viability flexibility. **Multi-phase/strategic sites** may face long-term risk and cost profiles that differ from standard typologies. **Different development types** (e.g., specialist housing, institutional uses) may have **distinct value/cost structures** not captured in plan-level viability work.

If schemes cannot meet the Golden Rules in full, they should not be approved. Allowing renegotiation would undermine public trust and create perverse incentives for speculative applications.

**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?**

If viability assessments are to be permitted in limited circumstances, policy must make clear that they apply only to genuinely previously developed land and not predominantly greenfield sites reclassified as Grey Belt.

The NPPF and Planning Practice Guidance should provide clearer definitions and guardrails to prevent greenfield land with natural capital potential being treated as brownfield. In addition, there is a need for clear safeguards and assessment of previously developed land to ensure that it is not assumed to hold low environmental value purely because it has been 'previously developed', which is frequently not the case.<sup>2</sup>

As above, if the Golden Rules are non-negotiable, viability assessments should not function as a backdoor to weakening them.

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, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

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

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 agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree:

a) Please explain your answer:

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?

**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 agree, partly agree, neither agree nor disagree, **partly disagree**, strongly disagree.

<sup>2</sup> See [Wildlife and Countryside Link: Open mosaic habitats high value guidance: when is brownfield land of 'high environmental value'? \(2024\)](#)

**Commented [KG27]: Q140** is about making sure that flexibility is only used where it's genuinely justified - mainly on complex brownfield land, not easy greenfield sites with big land value gains.

**Commented [KG28]:** •A change is proposed to the definition of 'grey belt' to remove reference to other "Footnote 7" areas. This reference was originally included to ensure that our grey belt policy reforms did not undermine the protection given to these areas  
•Our understanding is that this means that applications for development as being on the grey belt will now make sure they first look at whether the site meets the definition of grey belt, and then whether the development proposed is acceptable in that context

The draft NPPF's grey belt definition - now in the glossary - describes grey belt as Green Belt land that comprises previously developed land or other Green Belt parcels that **do not strongly contribute to the core spatial purposes of the Green Belt** (checking sprawl, preventing town merging, preserving historic settings), **while explicitly excluding environmentally or culturally significant areas** listed in footnote 7. This represents a refinement from earlier consultation wording that was more ambiguous about contribution tests, responding to concerns by sharpening criteria and reinforcing protection for sensitive environmental/heritage assets.  
Shift from *any land with limited contribution* toward land that **explicitly does not strongly contribute** (a reliable qualitative threshold).  
emphasis on excluding protected assets means that **biodiversity sites, landscapes, heritage assets** are less likely to end up labelled as grey belt simply because they might otherwise score low on Green Belt purpose tests.

Footnote 7 lays out areas that should not be treated as 'grey belt':

- 1.Habitat and wildlife protections (habitat sites, SSIs, irreplaceable habitats)
- 2.Landscape designations (national parks etc.)
- 3.Other spatial protections (green belt, local green space - areas of local community or strategic importance)
- 4.Heritage assets and archeological interest
- 5.Areas at risk of flooding + coastal change (reflecting adaptation/resilience priorities)

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

The proposed revisions to the Grey Belt definition represent a partial improvement. There is clearer recognition of designated environmental constraints and a slightly narrower framing of Green Belt purposes.

However, significant ambiguity remains. There is still no national assessment methodology to guide the identification of Grey Belt land, leaving room for inconsistency and dispute. Protection continues to focus primarily on designated assets, with insufficient recognition of non-designated but high-value or high-potential land for biodiversity, carbon storage or climate adaptation. Furthermore, climate mitigation and sustainable transport considerations are not embedded directly within Grey Belt tests, and as a result, land that performs poorly in Green Belt purpose terms but is unsustainable in climate terms could still be released.

We therefore recommend:

- Clearer integration of climate mitigation and adaptation, as well as sustainable transport, criteria within Grey Belt identification.
- Development of a consistent national assessment framework to reduce subjectivity and examination disputes.
- Improved protection for land with nature recovery or carbon sequestration potential, not only pre-designated sites.

**Commented [DS29]:** I know what we mean in principle, but what are we asking for here? a new type of secondary designation? Or just guidance that makes it clear that designation isn't the only mechanism that should be used to protect land?

## Chapter 14: Achieving well-designed places

Summary of UKGBC position on Chapter 14	
Overall, Chapter 14 represents a positive step towards improving placemaking. With clearer integration of climate, nature and community participation within the core definition of “well-designed places,” it could provide a more robust foundation for delivering high-quality, resilient and widely supported development across the country.	
Broadly support:	Recommended strengthening:
<ul style="list-style-type: none"> <li>Strengthened plan-led approach to securing high-quality design and placemaking</li> <li>The emphasis on locally distinctive design visions</li> <li>The use of design tools</li> </ul>	<ul style="list-style-type: none"> <li>Clearer policy-level integration of whole-life carbon, climate resilience, biodiversity and green infrastructure as core components of design quality.</li> <li>Stronger encouragement of early and meaningful community engagement in shaping design codes, masterplans and major developments.</li> <li>Firmer policy language to reduce over-reliance on guidance and discretionary interpretation.</li> <li>Greater clarity on how design principles should be balanced where objectives conflict.</li> <li>Continued investment in local authority capacity, skills and resourcing to implement these policies effectively.</li> </ul>

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

Strongly agree, partly agree, **neither agree nor disagree**, partly disagree, strongly disagree.

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

We welcome the strengthened emphasis on embedding a clear design vision within development plans. Requiring local authorities to articulate locally distinctive design expectations is an important step towards improving placemaking outcomes and provides flexibility for context-sensitive approaches.

However, policy DP1 and DP2 would benefit from greater clarity and improvements in several areas.

- Explicitly require key elements of sustainable design - including embodied carbon, green infrastructure, biodiversity, and climate resilience. At present

**Commented [KG30]: Key Requirements of DP1**

**1. Design Vision and Context**

Plans should set out a **design vision** for the area that reflects:

- how places *currently look and feel*, and
- how their future *character and quality* should evolve.

This requires evaluating **existing characteristics and potential** as part of the plan's spatial vision.

**2. Where Design Tools Are Needed**

Plans must identify **where design guides, design codes, and masterplans are necessary** to achieve good design and placemaking, including for:

- significant site allocations,
- areas of planned change (e.g., town centres),
- regeneration areas,
- suburban areas with intensification potential.

This moves design policy into a **spatially explicit part of plan-making**, rather than being left to local discretion.

**3. Locally Specific Design Policies**

Plans should include **locally specific design policies or standards** that:

- add necessary detail to the national design principles in *Policy DP3*, and
- respond to **particular local issues** (e.g., context, materials, form).

there is a risk that climate and biodiversity outcomes are treated as secondary considerations rather than core attributes of well-designed places.

- Greater emphasis on early and meaningful community engagement in shaping design policies, particularly in areas of growth or densification, to strengthen legitimacy and public confidence in change. The forthcoming Regenerative Places Framework from UK Green Building Council will support practical delivery of participatory, place-based regeneration.
- Address inconsistencies between the draft NPPF wording, the parallel Planning Practice Guidance consultation, and the proposed restrictions on local authorities in the proposed PM13. Delivering many of the outcomes envisaged in the design guidance - for example on whole-life carbon, embodied carbon, climate resilience and environmental performance - will require authorities to go beyond minimum national standards where justified by local evidence.

Finally, delivering high-quality design depends heavily on local authority capacity. While additional funding for planning officers is welcome, sustained investment in skills, recruitment and training will be essential if authorities are to prepare robust design codes and implement higher standards effectively.

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

Strongly agree, partly agree, neither agree nor disagree, **partly disagree**, strongly disagree.

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

Please see response to Question 146.

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

Strongly agree, partly agree, neither agree nor disagree, **partly disagree**, strongly disagree.

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

Policy DP3 sets out a comprehensive list of design principles and rightly emphasises contextual response. However, it provides limited guidance on how competing objectives should be reconciled in practice, for example where density pressures conflict with green space provision, or viability arguments are used to dilute climate performance.

To address this, we recommend that DP3 explicitly state that well-designed places should:

- minimise whole-life carbon, including embodied and operational emissions

**Commented [KG31]:** DP2 sets expectations for the use of design tools (design codes, guides, masterplans, site frameworks) to secure high-quality outcomes, especially on large or sensitive sites. These tools are where **climate-responsive design, green infrastructure, nature integration and active travel standards** can actually be locked in. However, DP2 **enables but does not require** climate- or nature-positive content – it depends on how local authorities use the tools.

**Commented [KG32]:** DP3 is the **decision-making policy**. It sets out the principles development proposals must meet to be considered “well designed” (layout, character, function, accessibility, safety, amenity, etc.).

**Why it might matter to you:**

- This is where **design quality is weighed in planning decisions**, including refusals.
- Climate and nature considerations are **present but high-level** (e.g. efficiency, resilience, green space), not strongly outcome-driven.
  - No explicit requirement to exceed minimum environmental standards.

**DP3: Key Principles for Well-Designed Places**

- Builds on current Framework paragraphs 135 and 139 to set out key principles for assessing proposals
- Retains policy that “development proposals that are not well designed should be refused”
- Longer list of principles for well-designed places, now including climate mitigation and adaptation plus green infrastructure:
  - Context:
  - Liveability
  - Climate
  - Nature
  - Movement
  - Built Form
  - Public Space
  - Identity
- Loses para on importance of trees, now moved to nature section (see N3 below)
- Slightly more emphasis on visual attractiveness, eg under identity: “the use of a coherent palette of materials, design features and planting”
- This policy carries “substantial weight” as inclusion of key elements from the overall section on “Creating high quality sustainable places” (chapters 12-17) will be so

- be demonstrably resilient to climate impacts such as overheating and flooding
- integrate nature and green infrastructure as essential design components, not optional enhancements.

As with previous questions, these principles should be embedded directly and would clarify that climate, resilience, and biodiversity outcomes are fundamental aspects of design quality.

We'd also like to re-emphasise the inconsistencies between the draft DP3 and the proposed restrictions on local authorities in the proposed PM13. Delivering many of the outcomes envisaged in this design guidance - for example on climate, nature, and resilience - will require authorities to go beyond minimum national standards where justified by local evidence.

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

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

**a) If not, what else would help secure better design and placemaking outcomes?**

As above, DP4 would benefit from clearer guidance on how climate and nature considerations should be weighed in assessing design quality. There is a risk that proposals which meet minimum regulatory standards but fall short of best practice on carbon, resilience or biodiversity could still be deemed acceptable in design terms. Clearer policy-level signposting that climate-positive and nature-positive outcomes are markers of design excellence would strengthen consistency.

Across DP1-DP4, climate mitigation, adaptation and biodiversity are largely enabled but not embedded as core design outcomes. There is no explicit expectation that well-designed places must minimise carbon emissions, deliver net gains for nature beyond statutory requirements, or be demonstrably resilient to climate risks. Treating these matters as peripheral risks weakening their weight in planning balance and appeal decisions.

In addition, none of the policies clearly require early, meaningful community engagement in shaping major schemes or design codes. Without explicit expectations, placemaking risks becoming a professional exercise rather than a co-produced process, potentially undermining trust in growth and densification.

**Commented [KG33]:** DP4 explains how decision-makers should assess design quality, including:

- use of design review,
- refusal of poor design,
- weight to be given to approved codes and guides.

**Why it might matter to you:**

• Strengthens the ability to refuse poor-quality development, but

- Does not define what "good" means in climate or nature terms – those must already be embedded in plans or codes.

**DP4: The Design Process**

- Builds on current Framework paragraphs 137, 138, and 140 "but places greater emphasis on considering design quality throughout the delivery process"
- No substantive change
- Building for a Healthy Life no longer referenced but expect new version within new PPG which will provide further detail on the use of tools like this
- Current para 141 on control of advertising is removed because it "is a separate regulatory regime". However, the regs for the advertising consent regime explicitly say that they interact with development plans so this is a concern, and there should therefore be a place for policy in how LPAs should approach the regulation of advertising

## Chapter 16: Promoting healthy communities

<b>Summary UKGBC's position on Chapter 16</b>	
Overall, Chapter 16 represents a positive step towards embedding health within planning policy. With clearer recognition of health as a core planning objective, stronger integration of climate and nature considerations, and more explicit expectations around community participation and infrastructure capacity, it could provide a more robust foundation for delivering healthier, more resilient communities.	
<b>Broadly support:</b>	<b>Recommended strengthening:</b>
<ul style="list-style-type: none"> <li>• The emphasis on planning for healthy communities and setting locally evidence-based standards for recreational land.</li> <li>• Stronger weight for community facilities and public service infrastructure alongside new development.</li> <li>• Retention of key community facilities.</li> <li>• Protection of Local Green Space and prioritisation of brownfield land.</li> </ul>	<ul style="list-style-type: none"> <li>• Explicit framing of health and wellbeing as a strategic objective of the planning system, aligned with local health strategies and the Environment Act 2021.</li> <li>• Clearer prioritisation of compact, connected, walkable neighbourhoods that reduce air pollution and support low-carbon living.</li> <li>• Stronger integration of green infrastructure standards and Local Nature Recovery Strategies within planning policy.</li> <li>• Explicit requirements for early and meaningful community engagement in planning for facilities and services.</li> <li>• Consideration of infrastructure capacity (not just proximity) in site selection.</li> <li>• Flexible, context-sensitive approaches to delivery and long-term stewardship of community facilities.</li> </ul>

**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?**

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

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

We broadly support the approach in Policy HC1. Allowing local authorities to tailor standards to local needs is appropriate, and we welcome the emphasis on collaborative engagement. This engagement must be early and meaningful so that local plans reflect community ambitions on climate action, nature recovery and community energy, and ensure site allocations and infrastructure planning deliver social value. The forthcoming UKGBC Regenerative Places Framework will help support practical, participatory regeneration.

**Commented [KG34]:** Policy HC1 establishes a more proactive, engagement-driven approach to planning for healthy communities, focused on:

- **Collaborative engagement** with service providers and communities
- **Embedding health outcomes** into the heart of plan-making
  - **Ensuring adequate, well-planned public service infrastructure**
  - **Supporting national ambitions** to reduce health inequalities and promote wellbeing

To strengthen the policy, the NPPF should frame health as a strategic priority of the planning system. Planning should clearly aim to enhance population and planetary wellbeing, reduce inequalities, and align with Joint Strategic Needs Assessments and Health and Wellbeing Strategies - ensuring health is treated as a core objective, not a secondary outcome.

We also recommend a stronger recognition of green infrastructure as central to healthy communities, aligned with national Green Infrastructure Standards and Local Nature Recovery Strategies.

159) Do you agree that Local Green Space should be 'close' to the community it serves? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

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

**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?**

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

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

We welcome the strengthened emphasis on securing community facilities and public service infrastructure alongside new development. Giving greater weight to proposals that provide such facilities is supported.

However, successful delivery depends on more than proximity. Policy HC3 should clarify that site selection must consider the actual capacity of infrastructure, rather than simply the physical presence of buildings. Without this, new development risks exacerbating existing service pressures. Social value principles, as reflected in the Public Services (Social Value) Act 2012, should inform planning decisions to ensure that new infrastructure strengthens community resilience, health outcomes and local economies.

In addition, these policies should recognise the importance of green infrastructure as community infrastructure. Public greenspaces, street trees, gardens and green corridors support physical activity, mental wellbeing and climate resilience, and should be treated as essential components of community provision rather than optional enhancements.

We also want to highlight that community facilities require viable long-term management models. Delivery mechanisms must be flexible and context-specific, varying between rural and urban areas and reflecting local capacity for stewardship.

161) Do you have any views on whether further clarity is required to improve the application of this policy, including the term 'fast food outlets', and the types of uses to which it applies?

Commented [DS35]: I think this is the first time we've asked for this.  
@Joanne Wheeler, just making sure you're happy?

Commented [KG36]: HC3: Community facilities and public service infrastructure serving new development

- This policy redrafts elements of current Framework paragraphs 100 and 101
- Current NPPF para 100 focuses just on education (given pupil numbers are falling it makes sense for this to be more general)
- New point on using planning obligations or conditions to ensure community facilities and public service infrastructure actually open when first occupied (or when an agreed proportion of the development is occupied).
- **Strongly welcomes it to this amount**

HC4: Proposals for new community facilities and public service infrastructure

- Redrafts current Framework paragraph 100(a) and parts of paragraph 101 to give substantial weight to proposals that provide new or improved community facilities and public service infrastructure where these come forward as specific development proposals
- Plus should consult with community on new play facilities

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

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

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

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? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

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

**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, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

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

We support the clarification that Local Green Space should not fall within areas regarded as Grey Belt or be undermined by Green Belt policy on previously developed land. Local Green Space designation plays an important role in safeguarding valued community spaces and should not be weakened - land providing significant environmental or community benefit should be excluded from Grey Belt designation.

Members strongly support preserving Local Green Space and embedding green infrastructure into development from the outset, as per UK Green Building Council's [Framework for a Nature-Positive Built Environment](#).

## Chapter 18: Managing Flood Risk and Coastal Change

Summary of UKGBC positions for chapter 18	
Overall, the direction of travel in Chapter 18 appears to reduce precaution in site selection while relying more heavily on mitigation measures. In the context of worsening climate impacts, we consider that national policy should instead reinforce a stronger avoidance-first approach to flood risk.	
Broad Support:	Recommended Strengthening:
<ul style="list-style-type: none"> <li>• Support retention of the sequential and exception tests as core flood risk safeguards.</li> <li>• Welcome requirement in F8 for SuDS to be designed in accordance with National Standards.</li> <li>• Recognition that consistent national standards can improve quality and delivery of drainage infrastructure.</li> <li>• Acknowledgement of the importance of clarity in applying F5 and F6.</li> </ul>	<ul style="list-style-type: none"> <li>• Concern that removal of the sequential test for surface water flood risk weakens the precautionary, “avoid first” approach.</li> <li>• Sequential test should apply to all sources of flooding, particularly given increasing climate impacts.</li> <li>• Risk that housing delivery pressures combined with changes to the exception test could undermine long-term resilience.</li> <li>• Greater clarity needed on lifetime assumptions and incorporation of future climate projections.</li> <li>• SuDS policy should be strengthened through requirements for adoption, long-term maintenance and monitoring by LPAs.</li> <li>• Policy should reinforce – not dilute – flood resilience in the context of escalating climate risk.</li> </ul>

**171) Do you agree with the proposed changes set out in policy F3 to improve how Coastal Change Management Areas are identified and taken into account in development plans?**

~~Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.~~

**a) Please provide your reasons, particularly if you disagree:**

**172) Do you agree with the proposed clarifications to the sequential test set out in policy F5?**

Strongly agree, partly agree, neither agree nor disagree, partly disagree, **strongly disagree.**

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

**We have significant concerns that the proposed changes to policies F5 and F6 represent a regression in national flood risk policy at a time of escalating climate risk.**

**Commented [KG37]:** New requirements include:

- Taking account of Shoreline Management Plans and the National Coastal Erosion Risk Map;
- Extending Coastal Change Management Areas to include estuaries and tidal rivers; and
- Considering risk over a 100-year timeframe

**Commented [KG38]: F5: The Sequential Test**

- This policy consolidates references to the sequential test set out in paragraphs 173 to 176 and 180 of the current Framework.
- Main change is additional clarification as to when the sequential test is not required, including in instances where a site is potentially at risk from surface water flooding, but where a site-specific flood risk assessment demonstrates that the proposed layout, design, and mitigation measures would ensure the development would be safe for its lifetime
- Also change (from September 2025 announcement and PPG change) allowing development in areas at risk of flooding if the development is weighed against other considerations and judged against other policies in this chapter, eg if it's safe for its lifetime

The clarification to the sequential test in F5, particularly the removal of the requirement to apply the sequential test to areas at risk of surface water flooding, weakens the precautionary basis of plan-making and decision-taking. Surface water flooding is one of the fastest-growing and least predictable forms of flood risk, affecting millions of properties nationwide. Removing this element of the sequential test risks directing vulnerable development into areas that may become increasingly unsafe and potentially uninsurable over the lifetime of the building. In the context of more intense rainfall, urban densification and ageing drainage systems, this change should be considered regressive.

More broadly, given that flood risk is identified as one of the most significant climate threats facing the UK, and one in nine new homes in England between 2022 and 2024 were built in areas now at risk of flooding<sup>3</sup>, national policy should be strengthening – not weakening – the precautionary approach. There is a lack of evidence or risk assessment accompanying this policy which is also of concern.

173) Do you agree with the proposed approach to the exception test set out in policy F6?

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree:

a) Please provide your reasons, particularly if you disagree

**174) Do you agree with the proposed requirement in policy F8 for sustainable drainage systems to be designed in accordance with the National Standards?**

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

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

We welcome the proposed requirement for sustainable drainage systems (SuDS) to be designed in accordance with National Standards. Well-designed SuDS are essential to managing surface water flood risk, improving water quality, and delivering wider co-benefits including biodiversity, urban cooling and placemaking value. However, the effectiveness of this requirement will depend on robust implementation, adoption, long-term maintenance arrangements and appropriate local oversight. Given the scale of existing flood exposure, policy should go further in ensuring SuDS are consistently delivered, properly maintained and integrated with green and blue infrastructure strategies.

175) Do you agree with the proposed new policy to avoid the enclosure of watercourses, and encourage the de-culverting and re-naturalisation of river channels? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree:

a) Please provide your reasons, particularly if you disagree:

<sup>3</sup> See [new research and data from Aviva \(2025\)](#)

**Commented [KG39]: F8: Sustainable Drainage Systems and Watercourses**

Redraft of paragraph 182 of the current Framework with new requirement that Sustainable Drainage Systems should be designed in accordance with the National Standards for Sustainable Drainage Systems, plus encourage de-culverting and re-naturalisation of water courses.

176) Do you agree with the proposed changes to policy for managing development in areas affected by coastal change? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree:

a) Please provide your reasons, particularly if you disagree:

177) The National Coastal Erosion Risk Map sets out where areas may be vulnerable to coastal change based on different scenarios. Do you have views on how these scenarios should be applied to ensure a proportionate approach in applying this policy?

178) Do you agree with the proposed new additions to Table 2: Flood Risk Vulnerability Classifications? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree:

a) Should any other forms of development should be added? Please give your reasoning and clearly identify which proposed or additional uses you are referring to:

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## Chapter 19: Conserving and enhancing the natural environment

Summary of UKGBC's positions on Chapter 19	
Overall, we support the strategic direction of Chapter 19 but consider that ambition must be strengthened and local flexibility retained to ensure planning fully contributes to nature recovery and climate resilience.	
Broadly support:	Strengthening recommendations:
<ul style="list-style-type: none"> <li>• Stronger strategic integration of nature into plan-making (N1).</li> <li>• Use of LNRS and environmental evidence to inform allocations.</li> <li>• Requirement for measurable green infrastructure standards.</li> <li>• Clearer articulation of the mitigation hierarchy and on-site BNG (N2).</li> <li>• Continued recognition of designated and irreplaceable habitats (N6).</li> <li>• Mandated statutory BNG framework providing national consistency.</li> </ul>	<ul style="list-style-type: none"> <li>• Remove or soften constraints on requiring more than 10% BNG where evidence justifies it.</li> <li>• Ensure no dilution of BNG ambition, including on small sites.</li> <li>• Reinstate explicit requirements to identify, map and safeguard ecological networks.</li> <li>• Give substantial weight to safeguarding and enhancing the natural environment in decision-making.</li> <li>• Strengthen linkage to Environment Act targets and climate resilience objectives.</li> <li>• Protect land identified for nature recovery from future allocation for development.</li> <li>• Provide clearer expectations for nature-positive design and measurable on-site enhancement.</li> <li>• Ensure EDP implementation reinforces – rather than weakens – the mitigation hierarchy and long-term stewardship.</li> </ul>

**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?**

Strongly agree, partly agree, neither agree nor disagree, **partly disagree**, strongly disagree.

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

We welcome the clearer emphasis in Policy N1 on embedding nature within plan-making rather than relying solely on development management. The requirement to use environmental evidence supports a more strategic, network-based approach. The expectation for measurable green infrastructure standards at plan level is also positive and should help ensure nature is integral to place-making rather than an afterthought.

**Commented [KG40]:** Policy N1 is the *plan-making* policy on the natural environment. It sets out **how local plans should identify environmental safeguards and opportunities** so that nature is protected, enhanced and integrated into development planning.

### Key Elements of Policy N1

#### 1. Safeguarding Important Environmental Assets

Plans are required to proactively **safeguard the natural environment**, including:

- Identifying internationally, nationally and locally designated sites of importance for landscape, geology, soils and biodiversity
- Using **environmental evidence** to understand where these areas are and how development might affect them
- Making sure these areas are protected from harmful development in plans and decisions.

Environmental evidence sources cited include Local Nature Recovery Strategies, protected landscape management plans, river basin management plans, national and community forest strategies, and others – meaning plans should draw on a **wide evidence base** when mapping and assessing environmental assets.

#### 2. Balancing Safeguarding With Development and Nature Recovery

N1 emphasises a *balanced approach* – plans must:

- **Protect areas of high environmental value,**
- **Direct development away from sensitive areas,** and
- **Pursue opportunities for nature recovery.**

The policy explicitly highlights that planning should consider **not only avoiding harm but also opportunities to enhance the natural environment** through development.

#### 3. Clear Standards for Green Infrastructure

A new requirement for plan-makers is to set **clear standards for green infrastructure** at the plan-making stage, drawing on **national benchmarks**. This is aimed at ensuring plans include meaningful, measurable expectations for green infrastructure provision as part of growth and development planning.

This goes beyond simply saying “protect trees and habitats” – it means plans should articulate what *good* green infrastructure looks like locally and how much is expected to support natural networks and access to nature.

#### 4. Biodiversity Net Gain (BNG) Implementation

The draft includes a **policy change on Biodiversity Net Gain**, which is part of N1's context:

- It proposes to **limit circumstances in which plans can require higher than statutory BNG contributions**. The statutory requirement (currently 10% net gain) will remain the floor.

- Higher targets or contributions above the statutory baseline can only be asked where they are **justified** – for example on specific allocated sites where it can be shown deliverable and appropriate. Plans cannot simply set larger BNG expectations across the board without strong evidence.

However, we have concerns about proposals to constrain local authorities from requiring more than the statutory 10% biodiversity net gain (BNG). A rigid ceiling risks undermining local ambition and flexibility. Habitat baselines vary widely: some sites will struggle to reach 10%, while others could exceed it with minimal viability impact. Local authorities must be able to justify higher requirements where evidence supports it – particularly on strategic allocations or where this enables nature recovery at landscape scale. Weakening or limiting BNG ambition now risks undermining investment, skills development and delivery capacity that has already been established.

More broadly, given the recent assessment by the Department for Environment, Food, and Rural Affairs which deemed natural degradation so bad it constitutes a national security assessment, the policy must ensure that nature is afforded equal weight to economic growth within decision-making. Wording that subordinates environmental safeguards to other policies risks eroding confidence, weakening delivery, and exposing the country to instability.

**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?**

It would be reasonable to seek more than 10% BNG on allocated sites where this is justified by evidence and viability, particularly:

- Where sites form part of a strategic ecological network identified through Local Nature Recovery Strategies, or similar evidence
- Where higher on-site gains can help deliver area-wide recovery objectives identified within Local Nature Recovery Strategies,
- Where higher on-site gains offset constraints on neighbouring sites, to avoid distant offsetting and supporting ecological networks
- Where baseline habitat value is low and uplift can be achieved efficiently
- Where development is of a scale capable of delivering meaningful habitat creation at landscape level
- Within areas of the green belt to support nature recovery

Given the scale of biodiversity loss, the NPPF should enable justified, plan-led ambition rather than impose rigid ceilings that constrain locally responsive ecological planning.

**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?**

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

**Commented [KG41]:** This was based off the discussion on our member call - far less contentious and acknowledged that it made sense to ask for more where appropriate as it aided more joined up recovery

**Commented [KG42]:** N2 is the decision-making policy that sits alongside N1 (which is about plan-making). Where N1 maps and safeguards assets, N2 governs how individual developments must respond to nature on the ground.

It requires planning decisions to:

- **Protect and enhance biodiversity and geodiversity**
- **Avoid significant harm first**, then mitigate, and only compensate as a last resort (the mitigation hierarchy)
- **Deliver measurable biodiversity net gain**, in line with statutory BNG requirements

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

We welcome the clearer application of the mitigation hierarchy and the expectation that development should actively improve the natural environment, not simply avoid harm.

However, the policy remains largely principle-based and does not sufficiently strengthen outcomes. It lacks explicit linkage to Environment Act targets, climate adaptation objectives, and measurable standards beyond statutory BNG.

To support effective implementation, national policy should:

- Provide clearer expectations for nature-positive design features to be embedded from the start (e.g. integrated habitat features, urban greening, multifunctional green infrastructure) - see [UKGBC's nature positive framework](#)
- Strengthen requirements for mapping and safeguarding ecological networks
- Ensure that substantial weight is given to protecting and enhancing the natural environment
- Provide clearer guidance and resourcing expectations for local authorities assessing ecological impacts

Without stronger wording, there is a risk that nature considerations are weakened relative to housing delivery pressures.

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 agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree:

a) Please provide your reasons, including how policy can be improved to ensure compliance:

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

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree:

a) Please provide your reasons, particularly if you disagree:

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

As Environmental Delivery Plans are implemented, planning policy should ensure that there are appropriate safeguards built in:

- Nature recovery and climate resilience are fully integrated

- Land important for flood management, cooling, carbon storage and ecosystem services is safeguarded
  - EDPs complement rather than substitute strong site-level mitigation and enhancement
  - Delivery mechanisms support long-term stewardship and monitoring.
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For any questions relating to the content in this consultation please contact [policy@ukgbc.org](mailto:policy@ukgbc.org).