

Appendix A: Briefing Note on proposed reforms to the NPPF, December 2025

Note: This briefing was previously circulated to Members in December 2025. The government published the new version of the National Planning Policy Framework (NPPF) for consultation on 16 December 2025. The draft framework represents the most significant overhaul of national planning policy since the NPPF was first introduced in 2012.

The draft document entirely restructures the current document around a series of policies within thematic chapters. Most chapters are split between plan-making policies and decision-making policies. Alongside the draft NPPF a consultation document has been published which asks 225 questions. The Planning Policy Team will be leading on drafting a response to the consultation.

The new draft NPPF is available to view [here](#).

The accompanying consultation document is available to view [here](#). A written ministerial statement has also been published which is available to view [here](#).

The government has indicated it will respond to the consultation and publish an updated, final version of the NPPF once the responses have been analysed, which is anticipated to be in Summer 2026.

The final policy changes will take effect immediately upon publication of the final NPPF document. Local planning authorities and other stakeholders can refer to the consultation draft in the interim to help inform the early stages of their local plan preparations.

The twelve most substantive reforms are:

1. A permanent presumption in favour of suitably located development.
2. Building homes around stations, a 'default yes' for suitable proposals that develop land around rail stations within existing settlements, and around 'well-connected' train stations outside settlements, including on Green Belt land.
3. Driving urban and suburban densification to support higher density development in sustainable locations, with good access to services.
4. Securing a diverse mix of homes, including rural social and affordable housing, and setting clearer expectations for accessible housing to meet the needs of older and disabled people.
5. Supporting small and medium sites.

6. Streamlining local standards to speed up local plan production.
 7. Boosting local and regional economies by giving substantial weight to the benefits of supporting business growth.
 8. Supporting critical and growth minerals, recognising their economic importance.
 9. Embedding a vision-led approach to transport, moving away from a 'predict and provide' approach.
 10. Better addressing climate change taking a proactive approach to mitigation and adaptation.
 11. Conserving and enhancing the natural environment to reflect Local Nature Recovery Strategies, to recognise landscape character, and to incorporate swift bricks.
 12. Taking a more positive approach to the use of heritage assets to better support heritage-related development.
- The driver for many of these changes is to unlock more homes in the right places, and further support the commercial development needed to drive growth.

The following provides a summary of the main proposals set out in the draft framework:

General Principles

1. **The draft of the new NPPF contains both revised plan-making policies and national decision-making policies (NDMPs) in one document.** The NDMPs are proposed to be non-statutory. However, the associated consultation makes clear this status remains 'under review', with the case for statutory NDMPs likely to be reconsidered 'if the proposed policies do not have the desired outcomes of supporting more effective decisions and reducing generic or alternate policies in development plans'.
2. **According to plan-making policy PM6 on general principles for plan-making, 'all plan-makers' should not 'duplicate, substantively restate or modify' what is contained in the NPPF's decision-making policies.** Policies should only be included that are 'necessary and relevant to the plan being prepared'.
3. **As soon as the draft is 'live', local development plan policies that are 'in any way inconsistent with the national decision-making policies' outlined in the NPPF should be given 'very limited weight' in decision-making.** The exception to this rule would be where local policies have been examined and adopted against the new framework.

4. **Plans being prepared today under the existing plan-making system can continue to be judged against the current NPPF.** However, any plans being brought forward under the new system (which includes the new East Herts District Plan) should use this new version.
5. **The proposed NPPF includes a series of new annexes that hold key technical reference information, including the methodologies by which to calculate housing need and the housing delivery test, and to conduct Green Belt reviews.** The consultation issued alongside the draft also proposes moving new planning practice guidance on viability into a further NPPF annex.

Achieving Sustainable Development

6. **Policy S1 says any development plan should seek to meet the development needs of their area as a minimum.** Plans should provide for new development, and improvements of the environment, in a way that promotes a sustainable pattern of growth and seeks to mitigate climate change and adapt to its effects.
7. **Policy S3 takes forward the presumption in favour of sustainable development.** It retains the existing principle that proposals which accord with the development plan should be approved without delay.
8. **Policy S4 says development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, which includes impacts in relation to other policies in the framework.** This might be where the proposal would have an unacceptable impact in relation to the allocation or safeguarding of land for particular uses in the development plan, or to the application of certain policies in the framework for safeguarding.
9. **Policy S5 proposes a new ‘tilted balance’ to assessing development proposals outside settlements.** It says only certain forms of development should be approved outside settlements. These include:
 - Rural business and services that need to be located outside settlements.

- Development within reasonable walking distance of a railway station that provides a high level of connectivity to jobs and services (the document clarifies that this would include Green Belt development assessed to be not inappropriate).
- Development that would address “an evidenced unmet need” (including where the council cannot demonstrate a five-year housing land supply) and where development would be well related to an existing settlement or would comprise major development for storage and distribution purposes that accord with policy E3. These developments should be approved, unless the benefits of doing so would be substantially outweighed by any adverse effects.

Spatial Development Strategies (SDSs)

10. **Policy PM1 introduces the new system of strategic planning. Spatial development strategies (SDSs) are required to be produced by strategic planning authorities and the mayor of London.** They should set a positive vision for future growth and change at a subregional scale, and should be ‘genuinely strategic in nature’, allowing for more detailed issues to be considered through other parts of the development plan.
11. **SDSs should set out a strategy for a sustainable pattern of growth covering a period of at least 20 years.** This includes through the apportionment to local planning authorities in the strategy area of objectively assessed needs for housing and other uses.
12. **Tests of soundness are applied to the examination of SDSs.** The tests are ‘positive’, ‘appropriate’, ‘effective’ and ‘consistency with national policy’. The ‘positive’ test states that a strategy which does not provide for objectively assessed needs ‘should be considered an exception’.

Local Planning

13. **Policy PM2 sets out that local plans should provide a spatial strategy for a period of no less than 15 years.** However, the consultation asks whether this period is still appropriate, or whether it should be reduced to ten years.

14. **Local plans should be prepared and adopted within 30 months of publishing a ‘Gateway 1’ self-assessment¹.** Authorities must start on the preparation of the next local plan no later than five years after adoption of the current plan. This could be earlier where an inspector at examination of the current plan has made a recommendation to do so or where there has been a significant change in local circumstances (such as an increased housing requirement).
15. **Policy PM10 requires plan-making authorities to engage proactively and regularly to identify and address cross-boundary matters,** including where development needs that cannot be met wholly within a particular plan area could be met elsewhere, and to determine optimal locations for growth. Where matters are already addressed by an adopted SDS, plan-making authorities within the strategy area do not need to revisit them when preparing their plans.
16. **Statements of common ground should be used to demonstrate that relevant cross-boundary matters have been addressed,** including by distributing and providing for unmet needs across neighbouring and/or nearby areas. Where it has not been possible to fully address cross-boundary matters, plan-making authorities should demonstrate that they have taken all reasonable steps to address them.
17. **Quantitative standards set through development plan policies should be limited to infrastructure provision, affordable housing requirements, parking and design and placemaking.** These should be in instances where such standards will provide clarity and a high degree of certainty about the requirements that relevant development proposals are expected to meet. The consultation makes clear this means plans will not be expected to set higher standards for energy efficiency than those within building regulations.
18. **The soundness tests for local plans remain, with the exception of the ‘effective’ test being replaced by a ‘realistic’ test,** and a new test stating that the plan should be in general conformity with any adopted SDS for the area.

Changes to Decision-Making Policies

¹ Gateway 1 is a mandatory self-assessment that marks the formal start of the new 30-month local plan-making process. Local Planning Authorities must use a standardised Gateway 1 self-assessment summary template to demonstrate they are prepared for the intensive 30-month timeline.

19. **New policy DM5 on development viability sets out a range of scenarios where viability tests might be appropriate to reduce planning contributions from a site to levels below that expected in local policy.** The policy says viability tests are reasonable where the development proposed is different from that envisaged during the local plan examination; where the site characteristics ‘differ substantially’ from those assumed during the plan process; where the site is burdened by unforeseeable costs; or where economic circumstances have changed significantly.
20. **A revised policy on planning conditions and contributions makes clear that ‘model’ planning conditions ‘should be used unless there are strong reasons for using a different condition’.** Conditions requiring discharge prior to development commencing ‘should be avoided’.
21. **Both local authorities and mayoral authorities are ‘strongly encouraged’ to make use of local development orders (LDOs)² to provide certainty to applicants about the prospects of permission.** The current framework does not extend to mayoral authorities and authorities are only ‘encouraged’ to use LDOs.
22. **The fact that an up-to-date calculation of local housing need is higher than the local housing requirement should not be considered evidence of unmet housing need for a period of five years from adoption of a plan,** as long as certain conditions are met. These are that the planning authority can demonstrate a five-year supply of deliverable housing sites (with the appropriate buffer) and where the housing delivery test indicates that the delivery of housing is more than 75 per cent of the housing requirement over the previous three years.

Green Belt

23. **Housing and mixed-use development around stations defined as ‘well-connected’³ will not be considered inappropriate, provided it**

² A local development order (LDO) is a planning tool used by local authorities to grant automatic planning permission for specific types of development in defined areas, streamlining the process by removing the need for individual planning applications.

³ Well-connected rail stations and underground, tram and light rail stops are those in a top 60 Travel to Work Area located partially or fully within England by Gross Value Added (GVA) and which, in the normal weekday timetable, are served (or have a reasonable prospect of being served due to planned upgrades or through agreement with the rail operator) throughout the daytime by four trains or trams per hour overall, or two trains per hour in any one direction.

is of an appropriate scale, does not prejudice long-term development proposals and complies with the ‘golden rules’⁴. The government says the objective of this policy is to support high-density development in sustainable locations.

24. **Policy GB2 says the preparation of SDSs should be informed by an assessment of the strategic role of Green Belt land in the area.** The assessment should take into account the five purposes of the Green Belt. The strategic assessment should be used to help develop the SDS and to identify whether there are areas where Green Belt boundaries may require further consideration through the preparation of local plans.
25. **Green Belt reviews should identify broad locations for strategic development including new settlements and major urban extensions.** Such broad locations should extend over any large site allocations in adopted local plans.
26. **The development plan should set out ways in which the impact of Green Belt releases could be offset through compensatory improvements** to the environmental quality and accessibility of remaining Green Belt land, reinstating a requirement that had been dropped in the 2024 version of the NPPF.
27. **Local plans should be informed by an assessment that identifies grey belt land,** in accordance with the process set out in the guidance on Green Belts issued in February 2025.
28. **Policy GB3 says Green Belt boundaries should be altered through local plans where this would enable the development of land around stations,** or where exceptional circumstances are fully evidenced and justified.
29. **The definition of grey belt in the glossary of the document no longer excludes sites such as wildlife habitats or assets such as heritage buildings, from grey belt designation.** The consultation document says the reference was ‘originally included to ensure that our grey belt policy reforms did not undermine the protection given to these areas’. However, it says the reference ‘could make it more difficult to

⁴ Golden Rules are specific requirements for development on land released from the green belt, ensuring it truly benefits communities, focusing on affordable housing (often with an uplift), essential infrastructure upgrades (local/national), and creating/improving accessible public green spaces.

accurately identify grey belt' sites and 'apply additional layers of protection', which it says is 'unnecessary'.

30. **Policy GB8 states that major housing developments in the Green Belt should be subject to the golden rules regarding affordable housing and infrastructure provision.** It clarifies that where development complies with the golden rules, this should be given substantial weight.
31. **Part 3 of policy GB8 sets out the three circumstances in which a site-specific viability assessment may be justified to allow contributions expected by the golden rules policy to be adjusted.** These are where a proposal is on brownfield land, where it is for a multi-phase, strategic site, or for a development model 'which is of a wholly different type to that assumed in the viability assessment that informed the development plan'. In these cases, it says, development should still 'make the maximum possible contribution' to affordable housing and infrastructure.

Housing

32. **Under proposed policy HO1, the housing requirements for individual local authorities should be taken from strategic-level SDSs, where those exist, and 'should not be retested' during local plan formation unless there has been a 'significant change in circumstances'.** The new plan-making policy for housing also proposes changing existing policy to specifically reference the need to accommodate travellers.
33. **Policy HO2 proposes that where SDSs are not in place, the housing requirement figure should be higher than the identified local housing needs assessment 'where appropriate'.** This would include situations where more homes are required to meet the needs of neighbouring authorities, or where authorities have 'significant growth ambitions'.
34. **Local authorities will be required, under proposed policy HO5, to set a minimum level of homes that should be built to accessible standards in their area, against a national baseline of 40%.** On sites of 150 homes or more, councils should use their local plan to set expectations for tenure mix in order to drive build.

35. **The consultation proposes introducing a medium-size site category into the planning system, covering developments of 10-49 homes, with an area of up to 2.5 hectares in size.** This definition is to be linked in to various policy easements – for example, that medium-sized sites be allowed to pay cash-in-lieu contributions for affordable housing.
36. **Under policy HO6, the consultation proposes local plans should allocate at least ten per cent of the housing requirement to sites of between one and 2.5 hectares.** The policy also retains the existing requirement for plans to allocate a further 10 per cent to sites of one hectare or smaller.
37. **New proposed policy HO13 on the build-out of residential and mixed-use development encourages local authorities to impose planning conditions on applicants ‘requiring that development begins within a timescale shorter than the relevant statutory default period’.** However, it says this should be done only where it would speed build-out ‘without threatening its implementation or viability’.

Urban and Suburban Densification

38. **Decision-making policy L2 on making effective use of land calls for ‘substantial weight’ to be given to various types of proposals that reuse existing sites.** It specifically encourages schemes that remediate land; make better use of underutilised land; provide temporary uses; make use of airspace above existing development; or provide ‘sensitive redevelopment or additional development within existing plots’, including mansard roof extensions.
39. **While opening up the possibility of ‘additional development within existing plots’, policy L2 also places limits on the scale of redevelopment within ‘residential curtilages’.** It says schemes should ‘not occupy more than twice the footprint of the existing building on the site, and retain at least 50 per cent of the non-developed area within the building curtilage’.
40. **In accordance with decision-making policy L3, residential or mixed-use developments within settlements should increase the density in the area in which they are proposed.** It says that while an area’s character should be taken into account in decisions, this ‘should not preclude development which makes the most of an area’s potential’.

41. **Policy L3 also proposes that plots around train stations should be built out at a density of at least 40 dwellings per hectare (dph), rising to 50dph where the station is ‘well-connected’ (see footnote 3 above).**

Climate Change

42. **Local authorities should propose development patterns that ‘contribute to radical reductions in Greenhouse gas emissions’.** The proposed plan-making policy CC1 on climate change says local plans ‘can’ be informed by an assessment of baseline carbon emissions and the potential effect of development options on future emissions.
43. **New proposed decision-making policy CC2 on the mitigation of climate change states that projects should, ‘where relevant’, deliver a variety of sustainability benefits.** These include being located close to sustainable transport and/or local facilities and amenities; conserving energy through design approaches; reusing existing materials; connecting to decentralised heat networks; and contributing to habitat restoration.
44. **Under proposed policy CC2, substantial weight would be given to improving the energy efficiency of existing buildings through a development proposal.** Likewise, substantial weight would be given to the use of renewable or low-carbon sources or heat networks.
45. **Proposed policy CC3 addressing adaptation to climate change requires decision-makers to consider the ‘potential impacts of climate change over the lifetime of the scheme’.** Existing policy does not specify whether it has to go further than considering existing impacts.

Economy and Town Centres

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

47. **The draft framework retains the town centre-first principle, including the sequential and impact tests for retail developments.** It retains the core principle that ‘main town centre uses’ should be located in centres, but seeks views on the retention of the sequential test.

Heritage

48. **Development proposals involving heritage assets should specifically consider the potential positive effects on the heritage asset of the scheme when assessing impact.** Revised policy HE5 on assessing effects on heritage assets proposes that it is the effect on an asset’s significance rather than the scale of the development that should be considered by decision-makers.
49. **The new draft proposes revising the weight given to the consideration of the potential effect of a development proposal on a designated heritage asset from ‘great’ to ‘substantial’.** A footnote states that this is to bring the document in line with statutory tests that require considerable importance and weight to be given to harm to the relevant designated assets.

Vision Led Transport Approach

50. **Sustainable transport considerations should form part of early engagement with local communities when drawing up local plans, under proposed plan-making policy TR1.** The policy also suggests that councils set thresholds for what constitutes a significant amount of movement arising from new development, against which to make planning decisions.
51. **Policy TR2 states that local plans should set local parking standards.** Currently the NPPF suggests this as an option.

Natural Environment

52. **Local authorities should not attempt to levy higher biodiversity net gain requirements than the statutory level, except for on specific site allocations where fully justified.** This is set out in draft plan-making policy N1 on identifying environmental opportunities and safeguards.

53. **Decision-takers should consider landscape character and 'existing natural features' when considering the impact of development proposals.** Under decision-making policy N2, development proposals should consider these factors and minimise biodiversity impact, which, where it cannot be avoided or mitigated, should result in permission being refused.
54. **Development proposals should incorporate integrated swift bricks into their construction** 'unless there are compelling technical reasons which prevent their use'. Decision-making policy N2 proposes that developments should also include features to support other threatened species including bats and hedgehogs.
55. **Substantial weight should be given to the preservation of the natural beauty of protected landscapes, replacing 'great weight' in the current framework.** Proposed policy N4 for protected landscapes adds that major development should only be supported in 'exceptional circumstances'.