<u>The revised NPPF: navigating the new "rules-based planning system"</u>

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1. The publication of the revised NPPF earlier this week heralds a significant change in national planning policy. Perhaps the most significant since the Framework was originally published in 2012. It is, of course, only one of a suite of legislative and policy reforms currently in train in the planning sphere. But as the policy vehicle which establishes the framework for both plan-making and decision-taking, the NPPF is central to the Government's growth agenda. Only time will tell whether these reforms will have the desired effect: to "boost housing supply and unlock economic growth in the years ahead".

2. Time is, however, in short supply for planners – indeed, all those involved in the planning industry - who have to get to grips with new national policy (and its non-sequential numbering system!) immediately. To assist in that process, we have produced commentary on what we consider to be *some* of the most interesting and important aspects of the revised NPPF:

    a. **Implementation**

    b. **The New Presumption in Favour of Sustainable Development**

    c. **Green Belt and Grey Belt: Doubling-down**

    d. **Conserving and Enhancing the Environment (including Biodiversity Net Gain)**

    e. **Local Energy Efficiency Standards – Rising from the Ashes**

    f. **The Safety of Women and Girls**

3. This commentary is not intended to be an exhaustive review of the changes in the revised NPPF, nor the last word on these subjects – look out for further analysis from the Cornerstone team in the coming weeks. We will also be running a series of roundtable events in the Autumn where the revisions to the NPPF will be discussed by a range of planning professionals in greater depth. And it will be a topic of discussion at our annual Planning Day on 23rd November 2026.

4. You can register your interest in the NPPF roundtable events please here. And can find more information about, and to book tickets for, Cornerstone's Planning Day here.

<u>Implementation</u>

5. We start at the end. Annex A of the revised NPPF tells us that its policies are material considerations which must be taken into account for decision-making from the day of publication (17th August 2026). It is for this reason that, up and down the country, planning statements, proofs of evidence, opening and closing submissions are being hastily rewritten to take account of the significant changes in national planning policy brought about by this new version of the NPPF.

6. Moreover, from the date of publication, any development plan policy which is "materially inconsistent" with national decision-making policies ("**NDMPs**") is to be given "**very limited**

weight" (and see below for the even stronger version of this specifically for BNG). Planners will, therefore, need to engage immediately with any relevant NDMPs: not only applying them to their proposals, but asking whether any applicable development plan policy – no matter how recently adopted – is materially inconsistent with them.

7. This policy is undoubtedly designed to give the NDMPs real teeth. And in many cases, it will. However, when undertaking this analysis, it is worth bearing three points in mind. First, mere inconsistency is not sufficient to engage the NPPF's deemed weighting – the published version of the NPPF drew back from the proposal in the draft that inconsistency "in any way" with NDMPs should result in development plan policies receiving very limited weight. Second, the Government has decided, for now at least, not to give NDMPs a statutory footing. They do not, therefore, benefit from the legislative primacy afforded to development plans. Third, as the courts have repeatedly told us, weight is ultimately a matter for the decision maker, who is entitled (subject to public law constraints) to depart from policy, even where that policy is expressed in directive terms. We expect this issue alone will spark much debate at inquiries, and likely litigation.

The new presumption in favour of sustainable development

8. The radical change to the presumption in favour of sustainable development has survived, largely intact, from the draft. The revised NPPF introduces a tilted-balance on steroids ("substantially" as opposed to "significantly and demonstrably" outweighed); and eschews the trigger for the presumption of plans or policies being "out-of-date", in favour of a locational-based presumption.

9. This change has largely been viewed as pro-development. However, there is a sting in its tail: a new reverse presumption *against* any development in the countryside which does not fall within its pre-ordained categories. It is, perhaps, the starkest illustration in the revised NPPF of the Government's objective to move to a more "rules-based" planning system, under which there will inevitably be winners and losers.

10. To recap:

    (1) Development *within settlements* is to be approved unless the benefits are "substantially outweighed" by any adverse effects (S4). The policy identifies a short (albeit non-exhaustive) list of circumstances in which the presumption is *likely* to be rebutted, including a failure to comply with NDMPs which state that proposals should be refused.

    (2) Development *outside of settlements*:

        i. Which (a) falls into one of the specified categories - which we will term "the countryside categories" (S5(1)(a)-(j)) - or (b) is appropriate development in the Green Belt (S5(5)), is to be approved unless its benefits would be "substantially outweighed" by the adverse effects.

ii. In all other circumstances (save for isolated homes – see S5(3)), a reverse presumption applies - development outside of settlements will <u>not</u> be permitted save in "exceptional circumstances", where benefits of the proposal "substantially outweigh" the adverse effects (S5(4)).

11. Whilst the architecture of the presumption remains largely unchanged from the draft NPPF, there are some important changes to the detail. Most notably, the definition of a "well-connected station" (SS5(1)(h)) has been expanded to include stations which are located within the top 80 Travel to Work Areas (TTWA) by GVA, although the service level-frequency minimums have remained the same (four trains per hour or at least two in any one direction). Also retained is the requirement that stations be within a reasonable *walking* distance, notwithstanding suggestions that the policy be expanded to include cycling.

12. There is little doubt that the new presumptions will be the subject of debate at inquiries and ultimately before the courts. Promotion of a rules-based system *may* increase certainty in the long run, but it also gives greater scope for arguments as to what the rules mean, and how they should be applied. It appears to us that some of the battlegrounds are likely to include the following:

(1) **Whose line is it anyway?** The definition of settlement *includes* areas defined as a settlement in a development plan, but the definition is not exhaustive. What happens, say, where the site falls outside of a settlement boundary which is out of date, and no longer reflects reality on the ground?

(2) **The Hokey Cokey ("one foot in…")** – we are told (S3(2)) that for sites which fall partly in and partly outside a settlement both policies S4 and S5 are to be applied. With the prospect that competing presumptions may apply to different parts of the same site.

(3) **EUN ("Evidenced Unmet Need")** – A critical unanswered question is whether there is more than one conception of EUN in the NPPF. In the Grey Belt exceptions (GB7(1)(g)) EUN appears to be limited to circumstances in which LPAs cannot demonstrate a 5yr supply or whose HDT score <75%. However, in the presumption policies (S5(1)(j)) it is expressly <u>not</u> limited to these circumstances. Does that mean that an evidenced unmet need for, say, affordable housing or older/disabled persons housing would be sufficient to bring a residential proposal which included such housing into the countryside category? And if so, would that apply to the entire proposal, or only for the type of housing for which there is EUN?

(4) **How big is too big?** – Two of the most important countryside categories ((S5(1)(h) & (j)) include criteria that the proposal is "of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure". This necessarily entails an exercise of planning judgement and is self-evidently a question on which reasonable people may reasonably disagree (and likely will). The same is true in respect of the requirement, found in the same countryside categories, that sites be "physically well-related" to settlements or stations.

(5) **One person's "reasonable walking distance…"** The NPPF has defined reasonable walking distances, but in doing so has left significant scope for disagreement. Is the 800m measured as the crow-flies, or actual walking distances? How much flex does the adverb "around" allow? And when will it be more appropriate to use the "around 10 minutes' walk" criterion?

<u>Green Belt and Grey Belt: doubling down</u>

13. Green Belt policy was one of the most contested areas of the NPPF, and has remained so. Decision-making concerning "Control of development in Green Belt" is to be found in GB6-GB8. GB6(2) now states the familiar rules on development in the Green Belt: inappropriate development is by definition harmful; no approval unless the very special circumstances test is met; etc. It is notable that Policy GB6 is unchanged from the consultation draft.

14. The consultation on the draft NPPF asked respondents whether they agreed policies GB6 and GB7 – which establish control of development in the Green Belt, and define when development will be appropriate and set out appropriate policy tests. Only 27% strongly or partly agreed, while 61% strongly or partly disagreed. As the Government recognised, this indicated strong opposition to the proposals. Given the politically sensitive nature of Green Belts, these results are hardly surprising. Nevertheless, the Government has retained the proposed approach, which sees relatively little change of substance from existing Green Belt policy, which itself saw a radical change in the December 2024 version of the NPPF, with the introduction of the Grey Belt exception.

15. Policy GB7 contains the categories of development which are not regarded as inappropriate (and therefore, by definition, not harmful to the Green Belt or its purposes). There are a few significant departures from the 2024 NPPF. First, the list of development regarded as not inappropriate has been expanded to include new types of development. Of most interest is the inclusion of residential or mixed-use development which is within "reasonable walking distances of a well-connected station" (GB7(1)(h)). This mirrors the stations policy applicable to development outside of settlement boundaries (S5(1)(h)), save that major development involving the provision of housing is required to comply with the "Golden Rules" in GB8. Notably, this must be read with plan making policy GB3(4): where a plan's spatial strategy has identified suitable land around well-connected stations, exceptional circumstances need not be demonstrated to alter Green Belt boundaries. The government clarified that the stations referred to in policy GB3 are those identified in the relevant spatial strategy under policy S2.

16. Second, the "preservation of openness" formulation is replaced in relation to other development which may be appropriate in the Green Belt. GB7(1)(f) lists: "Certain other forms of development, provided the impact on the openness of the Green Belt is **<u>minimised</u>**, and there would not be a **<u>significant conflict</u>** with the Green Belt purposes." (Emphasis added). In the 2024 NPPF, the text in paragraph 154(h) read "Other forms of development provided they **<u>preserve its openness</u>** and **<u>do not conflict</u>** with the purposes of including land within it". (Emphasis added).

17. The categories now listed in paragraph GB7(1)(f) include mineral extraction and processing, engineering operations, and transport, electricity network, water and telecommunications infrastructure required in a Green Belt location; development brought forward under a

Community Right to Build Order or Neighbourhood Development Order; certain material changes of use; and the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments. Notably, electricity network, water and telecommunications infrastructure, and mineral processing are new categories. Paragraph 154(h)(iii) of the 2024 NPPF allowed only "**local** transport infrastructure which can demonstrate a requirement for a Green Belt location". The Government describes this as confirming that necessary infrastructure in the Green Belt includes telecommunications alongside transport, water and electricity infrastructure.

18. However, "Electricity network infrastructure" is defined in the glossary as infrastructure facilitating transmission (i.e. substations, converter stations, interconnectors and cables). It does not include generation. So solar farms, onshore wind and battery storage remain inappropriate development in the Green Belt, requiring very special circumstances under GB6(2), with GB6(3) preserving the wider environmental benefits associated with increased production of energy from renewable sources as included within very special circumstances (carried over from 2024 paragraph 160). This means grid connections are not inappropriate so long as they meet the GB7(1)(f) test, but the generation they connect still is.

19. The concept of **Grey Belt** remains very much alive, with a tweak to its definition. Whereas, previously, land was excluded from the Grey Belt definition if the application of policies relating to areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development, that test is now gone. Thus, in determining whether land is Grey Belt, it no longer appears necessary to consider (for example) whether there might be a strong reason for refusal in respect of heritage. However, those considerations will now form part of a separate assessment under other policies in the new NPPF. Annex E to the NPPF now provides the assessment criteria (previously set out in the PPG) for Grey Belt land in relation to Green Belt purposes.

20. Finally, the government sets out in its response to the consultation that it "*remains committed to the ongoing protection of the Green Belt. The reforms introduced in the December 2024 Framework recognise that, in some areas, brownfield land alone will not be sufficient to meet development needs. As such, these reforms direct development towards lower quality grey belt land and require the delivery of public benefits.*" Planners will watch with interest whether the changes to Green Belt policy brought about by the December 2024 NPPF and underscored in the latest version unlock the levels of development in the Green Belt for which the government is striving.

Conserving and Enhancing the Environment

21. The NPPF gathers together chapters 18-20 with their 25 policies under the heading "Conserving and Enhancing the Environment". In this section of our article, we take a brief look at each in turn, identifying changes likely to be of immediate interest to practitioners.

22. "**Managing Flood Risk and Coastal Change"** is given its own chapter (Chapter 18 replaces part of Chapter 14, paragraphs 170-186), although the objectives and means of achieving them

(e.g. use of the sequential test) are familiar. The policy framework is more detailed and more prescriptive, as is the new Annex F on flood risk categories and classification of vulnerability (replacing Annex 3 in the old NPPF). Note that (as forewarned in the draft) all SUDS should be designed in accordance with the National Standards. [F8(2)].

23. The objective behind Chapter 19 "Conserving and Enhancing the Natural Environment" is to influence the design and location of development so as to help "drive nature's recovery" amongst other things, and this nature-positive focus is clear from most of the chapter's polices: N2, for example, includes a list of seven requirements designed to ensure that development proposals contribute positively to the natural environment and support nature's recovery:

    (1) **One eye-catching policy inclusion**: N2(1)(f) makes "integrated nest boxes" (i.e. swift bricks) mandatory as one measure to minimise adverse impacts on biodiversity, "unless there are compelling technical reasons preventing their use or would make them ineffective" and also requires threatened species-specific protections, for the first time naming hedgehogs (and so potentially requiring hedgehog highways).

    (2) **One eye-catching removal**: "Valued landscapes" have gone. Paragraph 187(a) of the 2024 NPPF required protection and enhancement of valued landscapes, whereas N2(1)(a) refers to landscape character and the natural beauty of the countryside, removing a well-litigated aspect of the NPPF. The "highest status of protection" formulation has also been dropped for Protected Landscapes in N4, although the Government confirmed they "retain the same high level of statutory protection".

24. **Biodiversity Net Gain** has also drawn a lot of attention, as three new policies combine to remove the ability of Local Planning Authorities to require biodiversity net gain above the statutory 10%, other than on specific site allocations. Back in 2023, when we gave our webinar on Achieving Biodiversity Net Gain in Practice, 14 authorities were considering a requirement greater than 10%. Current estimates differ, but as many as 26 authorities may have committed to (via emerging policy), or had indicated they were considering, BNG requirements above the mandatory 10%. The front-runner adopted plan is the Guildford Borough Local Plan part 2 (22 March 2023): Policy P7 requires 20% BNG.

25. Turning to the new NPPF, Policy N1(2) on plan making imposes limits on the use of local policies to require net gains in excess of those required by law. These are permitted, but only for "specific site allocations" and where "fully justified and deliverable" and not in respect of development that is exempt from the legal obligation to deliver biodiversity net gain.

26. In the decision-making policy, N2(3), the significance of this is underlined in that "no weight" should be given to those policies which do not accord with N1(2). It also states that development proposals "may" exceed statutory obligations, but this "may not be a requirement" unless set out in an up-to-date development plan policy (i.e. a policy that accords with N1). This goes further than the Annex A transitional provisions in relation to all other NPPF policies, which allows for "very limited weight" to be given to development plan policies that are "materially inconsistent" with national decision-making policies, N2(3) purports to remove the decision-maker's discretion rather than to guide it. This will highly likely result in litigation, given an adopted plan policy remains part of the development plan

for the purposes of section 38(6) of the Planning and Compulsory Purchase Act 2004; the NPPF is a material consideration and there is case law on the interpretation of trenchant policy language and on weight as a matter for the decision-maker.

27. There are also some surprising consequences of the new policy: N2(3) does not explicitly say what weight should be given to the net gain itself where it is offered by the developer and secured by an appropriate legal instrument. It would surely be odd for a planning authority to give weight to the increased benefit of that enhanced net gain, but no weight to a policy which makes provision for it, but given the objectives of the chapter, the enhanced gain is perhaps an obvious material consideration. This is just one example of the potential for this policy intervention to cause difficulty. The consultation responses to the draft NPPF and the existing local policies that will be caught by the new NPPF's approach to BNG make this issue a potential flashpoint.

28. Chapter 20 "**Conserving and enhancing the historic environment**" replaces Chapter 16 and paragraphs 202-221 with 10 policies. The MHCLG response to consultation on the draft confirms that the statutory duties in respect of listed buildings and conservation areas are to be extended, as provided for by s.102 of the Levelling Up and Regeneration Act 2023. It also confirms that the use of the word "conserve" in the NPPF is shorthand for "preserve or enhance". The Glossary defines conserve helpfully and in so doing enables a neater formulation of the policies (e.g. HE4 "Securing the conservation of heritage assets") but this should not obscure the intended alignment of this term with the statutory duties, and its definition within the glossary.

29. More significant is the NPPF's new and explicit definition of "Substantial harm" within HE5(2)(d). It occurs "where the development proposal would seriously affect a key element of the asset's significance". The MHCLG response to consultation on the draft "is clear" that the change from "great weight" to "substantial weight" in HE6(1) "does not reduce heritage protections" [page 129] and has added HE6(3) to underline this.

Local Energy Efficiency Standards – Rising from the Ashes

30. Energy efficiency is a key part of shifting new housing to being both cheaper and healthier for its new residents and contributing to (rather than undermining) the net zero target. A number of local authorities, frustrated at central Government's slow pace in revising energy efficiency standards in Building Regulations, a number of which have adopted local plan policies requiring or incentivising detailed standards for new development relating to building fabric, overheating, energy efficiency, the use of fossil fuels, renewable energy and embodied carbon, which went beyond both existing and planned Building Regulations.

31. Rather against expectations, policy PM13(1)(b)(iii) has not just preserved, but has extended local authorities' ability to set energy efficiency standards that go beyond existing and planned Building Regulations. PM13(1)(b) still starts from a prohibition: plan standards "should not cover matters that are already addressed by Building Regulations", with three exceptions only: accessibility, water efficiency and energy efficiency. Any energy efficiency standard must have "a clear and robustly costed rationale which shows that there will not be an adverse impact

on the viability and deliverability of development". That much is carried across from the December 2023 Written Ministerial Statement which previously addressed the issue.

32. PM13(1)(b)(iii) then deviates from the previous position (and Annex A makes clear the 2023 WMS no longer represented up-to-date Government policy). The 2023 WMS directed that policies going beyond Building Regulations "should be rejected at examination" if they lacked a costed rationale ensuring that "the additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP)". TER and SAP were the only route, and non-compliance carried an express rejection consequence. PM13(1)(b)(iii) instead provides that "any such standards <u>should be</u> expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP) or other approved calculation methodology" (emphasis added). Two changes: the rejection trigger has gone, and an alternative limb has been added.

33. The deliberate introduction of the "should" language around the use of specific metrics is important. It gives much more scope for authorities to bring forward policies that use, for example, Low Energy Transformation Initiative (LETI) metrics, focusing on the carbon efficiency of the homes themselves and Energy Use Intensity (EUI), on the basis that such policies are in overall compliance with the NPPF so long as they are justified by a robust evidence base that addresses cost and viability.

34. This is a significant change from the consultation draft version of PM13, which did not permit local energy efficiency standards beyond Building Regulations at all, and proposed to commence section 43 of the Deregulation Act 2015, which would have repealed the power in section 1(1)(c) of the Planning and Energy Act 2008 to set such local energy efficiency standards. Question 18 drew 1,604 responses, of which 54% strongly disagreed and only 14% strongly agreed. The government thus amended PM13 and stated in its Consultation Response that it "will not commence s.43 of the Deregulation Act 2015 at this time". The statutory power therefore survives. That power must also be read alongside section 19(1A) of the Planning and Compulsory Purchase Act 2004 ("**PCPA 2004**"), which provides that development plan documents must, taken as a whole, "*include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change*".

35. This is reinforced by the requirements of new NPPF policy CC1, that development plans must take a proactive approach to mitigating climate change and supporting the transition to net zero, in accordance with the objectives and provisions of the Climate Change Act 2008, and must also take a proactive approach to adapting to climate change. The objective of CC1 (relevant to its interpretation) is to shape policies in ways that contribute to radical reductions in greenhouse gas emissions and adapt to the full range of current and potential impacts of climate change. It is notable that local energy efficiency policies address <u>both</u> mitigation and adaptation, and are thus strongly supported.

36. The softening of the 2023 WMS language in the new PM13(1)(b)(iii) also has important implications for the application of Annex A paragraph 2 and whether the development plan policies that currently go beyond building standards using metrics other than TER and SAP are

“materially inconsistent” with the national decision-making policies in the Framework. Firstly, the inconsistency is only with decision-making policies, so PM13(1)(b)(iii) is not directly relevant. The DM policy is DM7(2), and it is unclear whether the cross-reference to PM13 is enough to cause an issue at all. Second, even assuming it is, it will likely be difficult to characterise as materially inconsistent with DM7(3) and other relevant DM policies (such as CC2 and CC3 on climate mitigation and adaptation) a policy which pursues the same substantive outcome as is permitted by PM13(1)(b)(iii), better-than-Building-Regulations energy performance, and differs only in the unit of measurement.

37. Finally, PM13(2) allows quantitative standards on matters not named in PM13(1) where they “have a clear and robustly costed rationale, are proportionate and will not have an adverse impact on the viability and deliverability of development”. The government said this “allow[s] a wider range of local standards to be set compared to what was consulted upon”. Embodied carbon, overheating and fire safety were among the matters respondents raised, and none is addressed by Building Regulations in the way energy efficiency is. PM13(2)(b) is therefore the gateway for a local embodied carbon standard, on an evidential rather than a metric test. On water, PM13(1)(b)(ii) permits the tighter optional Building Regulations requirement where justified, or “exceptionally a more stringent local standard in areas of serious water stress”.

The safety of women and girls in the new NPPF

38. The revised NPPF marks a significant shift in the treatment of women and girls’ safety within the planning system. Whereas earlier iterations of national policy referred more generally to creating safe and inclusive places, the new Framework expressly identifies women and girls as groups whose safety, and fear of crime, must be considered through both plan-making and development management. This change reflects sustained campaigning by organisations, practitioners and parliamentarians, including Anna Sabine MP, and aligns with wider recognition that the built environment is experienced differently by different groups.

39. Cornerstone was delighted to host Anna for a discussion on women in placemaking alongside Susannah Walker (Founder, In Her Place) and Francesca Sidoli (Deputy Head of UK and European Real Estate and Infrastructure, CT Group) earlier this year. Their campaigning has resulted in the safety of women and girls being made an explicit consideration for planning decision-makers.

40. The most notable amendment is within DP3(2)(f), which requires public spaces to be “safe, secure, inclusive, and accessible” and expressly refers to women and girls. The policy moves beyond abstract aspirations by identifying tangible design responses, including high-quality pedestrian and cycle routes, integrated lighting and natural surveillance through active frontages. This reinforces the principle that safety is not solely a policing issue but can be designed into the public realm through good placemaking.

41. A similar approach is adopted in TR4(1)(c), which requires transport considerations to help create places that are safe and inclusive for all users, “particularly for women and girls”. The express reference is important given the evidence that concerns about personal safety frequently influence how women travel, where they travel, and whether they use sustainable modes of transport at all. The policy therefore strengthens the argument that the design of

streets, routes and transport infrastructure is a material planning consideration rather than an afterthought.

42. The new security provisions in P5 further embed these considerations within decision-making. P5(1)(a) requires development proposals to identify potential safety risks and proportionate mitigation measures, specifically recognising women and girls as groups who may be vulnerable to crime or the fear of crime. P5(1)(a) specifically references the "fear of crime", thus acknowledging that safety must be a part of the design of a place because a perceived lack of safety, or a fear of entering a space in which one is vulnerable, can exclude women from public spaces.

43. The issue of women and girls' safety in planning decision-making has not yet concerned the courts. The "fear of crime" issue was addressed in *West Midlands Probation Committee v Secretary of State for the Environment, Transport and the Regions* (1998) 76 P. & C.R. 589 where the Court of Appeal confirmed that justified public concern about safety and fear of crime, particularly affecting vulnerable communities, may constitute material planning considerations in determining applications. In the world of inquiries, the Angiolini Inquiry (2025), which followed the murder of Sarah Everard, highlighted the need for planning guidance that addresses the prevention of sexually motivated crimes including measures such as better lighting, CCTV, increased footfall and visible policing. It will be interesting to see whether, with new prominence within the NPPF, the issue of women and girls' safety is a topic of challenge.

44. Taken together, these additions to the NPPF provide a stronger policy basis for ensuring that the safety of women and girls is addressed at every stage of the planning process. They make clear that perceptions of safety, inclusive design and crime prevention are no longer peripheral issues but are now embedded within national planning policy and relevant to the assessment of development proposals.

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