



Leverhulme Centre
for Nature Recovery



Policy analysis

Aligning the draft National Planning Policy Framework with the Land Use Framework for England

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May 2026

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This policy analysis compares the draft revisions to the [National Planning Policy Framework](#) (NPPF) for England, currently being reviewed by the government, with the [Land Use Framework](#) (LUF) that was published in March 2026. It highlights many common goals but also some potential conflicts and inconsistencies that could undermine policy delivery. The final section provides a detailed list of recommended revisions, highlighting critical opportunities to align the NPPF with the LUF to support delivery of our multiple goals for climate, nature, housing, infrastructure and food.

Key recommendations

- 1. Restore the balance between economic, environmental and social goals**, to achieve the aim of sustainable development.
- 2. Adjust the method for calculating local housing need** to avoid unachievable local targets that trigger a presumption in favour of speculative development.
- 3. Strengthen nature protection** to meet statutory biodiversity targets to halt and reverse species loss and protect 30% of land for nature conservation by 2030.
- 4. Restore mechanisms to enable meaningful local democratic input** and accountability in plan making and planning decisions.

Citation:

Leverhulme Centre for Nature Recovery, 2026. Aligning the draft National Planning Policy Framework with the Land Use Framework for England. Leverhulme Centre for Nature Recovery, University of Oxford.

Shared goals of the Land Use Framework (LUF) and National Planning Policy Framework (NPPF)

The LUF is a vital tool for supporting delivery of a resilient food system and housing and infrastructure requirements alongside the statutory Carbon Budget, National Biodiversity Strategy and Action Plan and Nationally Determined Contribution to climate change. Based on four land-use principles (multifunctionality; right use, right place; future-ready decisions; adaptive by design), it aims to draw on local knowledge to deliver multiple benefits tailored to the local context, while being flexible to incorporate new evidence and changing priorities.

Both the LUF and NPPF aim to support strategic spatial planning to maximise opportunities for growth, food security, nature recovery and climate resilience while minimising trade-offs between goals. To achieve this, they both aim to direct development to sustainable locations (e.g. avoiding damage to sensitive habitats and facilitating public transport connections) whilst protecting and enhancing the environment. In this section we summarise shared goals across key policy sectors for nature, climate resilience, food security, water quality and communities.

Nature recovery

The NPPF and LUF aim to deliver housing and infrastructure alongside the statutory biodiversity targets and international commitments for England, which are:

- Protect 30% of the UK's land and sea for nature by 2030 (30by30).
- Restore or create more than 500,000 hectares of a range of wildlife-rich habitat outside protected sites by 2042.
- Halt the decline in species abundance by 2030 and reverse it by 2042, so that it is higher than in 2022 and at least 10% higher than in 2030.
- Reduce the risk of species' extinction by 2042 compared to 2022.
- Reduce nitrogen, phosphorous and sediment pollution of the water environment from agricultural land by 40% by 2038 (from a 2018 baseline).

Local Nature Recovery Strategies (LNRSs) are a key tool for delivering these targets, and National Parks and National Landscapes are expected to make a strong contribution.

In line with the 'right use, right place' principle, the LUF aims to deliver habitat creation and restoration where it can have the greatest ecological impact, helping to reconnect fragmented landscapes and support priority species. The NPPF also aims to support these goals through policies N1 and N2, which align planning with LNRSs, protect existing features such as trees and hedgerows, and support delivery of green infrastructure, nature-based solutions and biodiversity enhancements.

Policy S2 supports this by specifying that development plans should identify ‘land that is protected or proposed to be enhanced for specific purposes (such as habitat improvement)’ which can be used to guide development locations and inform other policies. Similarly, policy HO4 specifies that locations for large scale development should ‘Address strategic environmental opportunities and safeguards, including those set out in Local Nature Recovery Strategies.’

Nature-based solutions for climate resilience

In line with the principles of multifunctionality (delivering multiple benefits on the same land), future-ready decisions and ‘adaptive by design’, both the LUF and NPPF support delivery of nature-based solutions (NbS) with benefits for both biodiversity and people, especially for climate resilience.

The LUF recognises that habitat networks protect carbon stores, secure vital water supplies and reduce flood risk, and emphasises that ‘a thriving natural environment and resilience to a changing climate are the foundations of our economy and essential for food security and profitable farm businesses.’ It aims to accelerate the use of NbS to support landscape-scale climate change resilience. This will include restoring peatlands, coastal habitats and wetlands that store carbon and reduce flood and wildfire risk, increasing tree canopy cover, and greening urban areas to tackle overheating and flooding.

Both the LUF and NPPF aim to incorporate high quality green and blue space into new development, to deliver benefits for health, well-being, nature recovery and climate resilience. NPPF policies N1, HC3 and CC1 require development plans and proposals to deliver green infrastructure in line with the national Green Infrastructure Standards, and to identify opportunities for nature-based solutions for carbon storage, nature recovery and resilience, in line with LNRSs. Policy DP3 specifies that development should connect to a network of high quality, accessible, multi-functional green infrastructure and sustainable drainage systems.

Both the LUF and NPPF support multifunctional sustainable urban drainage systems (SuDS), which support biodiversity, store rainwater that would otherwise contribute to storm overflows, and reduce flood risk in urban areas.

NPPF policy F3 also steers development away from areas affected by coastal change and requires development plans in these areas to safeguard land for flood protection, including by creating protective saltmarshes (managed realignment).

Climate change mitigation

Both the LUF and NPPF aim to support climate resilience and Net zero targets. In the NPPF, policies M1 and M3 ban new licences for oil, gas and coal extraction, and policy CC1 requires plans to take a pro-active approach to climate change adaptation and mitigation. Policy DP3 requires new developments to contribute to climate resilience through designing buildings and landscaping to conserve energy and minimise climate risks such as overheating, aligning with the principles of future-ready decisions and ‘adaptive by design’.

Food security

To support the Government's commitment to maintain overall food production in England, both the LUF and NPPF aim to safeguard our best and most versatile farmland by targeting development and (for the LUF) woodland creation towards less productive land (in line with the 'right use, right place' principle). This helps to ensure that land use changes in England do not displace the nature and climate impacts of food production abroad.

Water quality

The LUF aims to improve water quality through habitat restoration and investment to reduce storm overflows, including through including more SuDS in new developments. This will support nature recovery and reduce water treatment costs. In line with this, NPPF policy P3 requires development proposals to assess and mitigate water quality impacts, especially for sensitive water bodies such as chalk streams, and policies N2, DP3 and F8 encourage use of SuDS to improve water quality.

Communities

The LUF emphasises that communities want a greater say in land use decisions and stewardship. LUF Principle 2 (right use, right place) emphasises the need for local input to land-use plans, drawing on local knowledge, values, data and priorities to align with local context and ensure coherent and fair outcomes.

Supporting this, NPPF policy PM6 requires engagement with communities during development plan preparation, and policies HC1 and HC4 require engagement when planning for community facilities and public service infrastructure.

Potential conflicts between the LUF and NPPF

The LUF reports that while communities see the need for house building, they also worry about conflicts with food production, nature recovery, safeguarding wildlife habitats, and equitable access to green space.

To tackle these conflicts, the LUF aims to ‘reduce the pressure of development on other land uses, ensuring that our homes and infrastructure can be delivered rapidly with confidence from communities that it is in the right place and designed to include space for nature.’ It also notes that ‘we need to strategically conserve the agricultural land with the greatest long-term potential for food production, avoid development on nature reserves, introduce habitats for wildlife within farming landscapes, and expand the area of semi-natural habitat.’

However, analysis has revealed several important areas where the draft NPPF needs strengthening to align with the LUF goals on nature recovery, food security, water quality, flood and climate resilience, and community empowerment.

The overarching issue is the imbalance between the three pillars of sustainable development, with ‘substantial weight’ typically given to accelerating housing and infrastructure delivery (seen as a proxy for economic growth), but not to protecting environmental quality and delivering social benefits. In the long term, the intertwined impacts of biodiversity loss, climate change, and pollution could lead to environmental degradation, food security impacts, negative impacts on human health and wellbeing, financial risks and economic losses that undermine the growth agenda these policies aim to support.¹

Key issues for different sectors are identified below, followed by detailed recommendations for improvement.

Unachievable local housing targets undermine strategic planning

A crucial underpinning problem is the proposed new method for calculating local housing need (NPPF Annex D). This is set at 0.8% of current housing stock multiplied by a housing affordability factor. Using current (May 1996) data, this results in an average annual housing addition target of 1.5% of current stock across all Local authorities, with 36 having to deliver over 2% and a high of 5% (for Kensington and Chelsea). The issue is that these minimum targets have no relationship with projected future population growth or economic growth in each area, and there is limited flexibility to account for local constraints. In addition, because it is based on current housing stock, building more homes will simply increase the next target – the target will never decrease, no matter how many homes are built or how little open space remains.

¹ Ranger et al (2023). [The Green Scorpion: the Macro-Criticality of Nature for Finance – Foundations for scenario-based analysis of complex and cascading physical nature-related risks](#). Environmental Change Institute, University of Oxford

This method is likely to result in unachievable targets for many urban areas, especially where house prices are high – which can be due to a desirable location or genuine constraints on land availability rather than reflecting a market imbalance. Setting unachievable targets will simply result in more Local Planning Authorities (LPAs) failing to meet delivery targets, which means they will be forced to allow speculative development in locations not allocated in the Local Plan. This could result in poorly planned, environmentally damaging development that does not address local needs, priorities and constraints. Alternatively, to meet unrealistic targets, LPAs may be forced to allocate much-loved local green spaces for development, with adverse impacts on wildlife, ecosystem services, and the health and wellbeing of local communities.

Even where sufficient land is allocated, house building may not take place for reasons beyond the control of the LPA. For example, some developers choose to maintain strategic portfolios of land² while delaying building to keep house prices high and thus increase their profit margins ('land banking').³ They can also use viability assessments to negotiate reductions in the provision of affordable housing (defined as housing that is for sale or rent at 80% of market values). In addition, skilled workers are in short supply, energy and construction materials are expensive (partly due to geopolitical conflicts), and the market is weak due to the cost-of-living crisis and lack of affordable homes. Indeed, it is estimated that there are one million unbuilt homes with planning consent,⁴ but the local housing targets do not account for this. Yet if the allocated homes are not built, the LPA will fail the Housing Delivery Test and be forced to allow unplanned speculative development.

As well as undermining all the policies in both the LUF and NPPF aimed at delivering well-designed housing alongside nature recovery and environmental protection, the flawed housing need method is clearly incompatible with other parts of the draft NPPF that specify that plans and policies should be achievable and deliverable in practice.

Reflecting the drive to increase housing delivery at any cost, Annex A(9) says that the government will continue to explore 'the potential for planning freedoms and flexibilities, for instance where this would facilitate an increase in the amount of housing that can be delivered.' Rather than tackling the underlying problems outlined above, this risks providing loopholes to avoid meeting the standards set out in the rest of the framework, leading to poor quality homes or increased environmental damage.

More widely, economic analysis has shown that the housing crisis in England is not due to undersupply of housing. Housebuilding rates significantly exceeded household growth between 1996 and 2018, leading to a surplus of 1 million houses, yet house prices increased steeply. Housing is unaffordable partly due to low wage growth and cuts in housing benefit for young people, coupled with lack of social housing.⁵

2 Competition & Markets Authority, 2022. [Housebuilding market study: Local concentration and land banks working paper](#). London: Crown Copyright.

3 Foye, C. and Shepherd, E. 2023. [Why have the volume housebuilders been so profitable?](#) Glasgow: UK Collaborative Centre for Housing Evidence.

4 Singer Hobbs, M. 2025. [Strategic planning for green prosperity](#). London: IPPR.

5 Mulheirn, I. 2019. [Tackling the UK housing crisis: is supply the answer](#). Glasgow: UK Collaborative Centre for Housing Evidence.

Continuing to build unaffordable houses in excess of demand (partly to act as investment properties) will simply lead to more empty properties and will exceed UK carbon budgets even if all new build houses are Net Zero.⁶ A more effective strategy could be to tackle the construction skills shortage, penalise developers for failing to deliver consented homes, increase the proportion of affordable and social rent housing, and provide greater resources for planning authorities and consultees to speed up delays in the system.

Infrastructure impacts are not fully considered

The imbalance between economic, social and environmental objectives is also apparent in the policies on infrastructure. NPPF policy E1 requires plans to make provision for data centres, associated generating capacity, and freight and logistics facilities where needed, e.g. in AI growth zones or Industrial Strategy Zones, and policy E2 gives 'substantial weight' to the economic benefits of this infrastructure, which could result in unsustainable development.

Data centres are a particular issue as they have very high energy and water needs that may not be compatible with climate targets and available water supplies (with many being planned for water-stressed areas of the UK⁷). Approval should depend on proof that the cumulative impacts will not jeopardise our statutory climate and nature recovery targets and will not result in over-abstraction of water that affects local communities and wildlife.

Loopholes when approving developments

The NPPF aims to focus development in and around existing urban centres and railway stations, and limit development outside settlements (policies S4 and S5). However, this intention is undermined by loopholes.

For policy S5 (limiting development outside settlements) there is a long list of exceptions, including development for agriculture, horticulture and forestry; outdoor sport and recreation; allotments; cemeteries and burial grounds; mineral extraction; engineering operations and infrastructure (including for transport, energy and water); roadside facilities; national defence and security; rural businesses and services including tourism; extension of an existing building; infilling within groups of houses; exception sites under policy HO10; Community Right to Build Order or Neighbourhood Development Orders; unmet need for gypsy or traveller accommodation; development within walking distance of a railway station or physically well-related to a railway station or a settlement within which the station is located; land allocated outside settlements in the development plan; development to address unmet need (including where the LPA cannot demonstrate a five year supply of deliverable housing sites or scores below 75% in the most recent Housing Delivery Test); major development for storage and distribution; isolated homes for rural workers or which are 'truly outstanding, reflecting the highest standards in architecture', and 'exceptional circumstances, where the benefits of the proposal would substantially outweigh the adverse effects.'

6 zu Ermgassen, S.O.S.E., Drewniok, M.P., Joseph W. Bull, J.W., Corlet Walker, C.M., Mancini, M., Ryan-Collins, J. and Cabrera Serrenho, A. 2022. [A home for all within planetary boundaries: Pathways for meeting England's housing needs without transgressing national climate and biodiversity goals](#). *Ecological Economics*, 201, 107562. doi: 10.1016/j.ecolecon.2022.107562

7 Body, A., Hayes, O. and Johnson, N. 2026. [Not a drop to drink: How Britain's data centre surge threatens water security](#). London: Global Action Plan.

Although development can be refused, this hinges on subjective judgements of whether ‘the benefits of [the development] would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework’. The long list of loopholes and exceptions risks serious biodiversity loss because the national policies to protect nature are inadequate (see next section).

Clause S5(j) is particularly concerning. This will open up land outside settlements to development where there is an unmet housing need or where the LPA cannot demonstrate a five-year supply of deliverable housing sites or scores below 75% in the most recent Housing Delivery Test. As noted above, unrealistic local housing targets mean that many LPAs are likely to be in a position of having ‘unmet need’, thus opening up the potential for widespread unplanned speculative development outside settlements and rendering policy S5 ineffective. This conflicts with the LUF ‘right use, right place’ principle.

Finally, there is a worrying move against application of pre-commencement planning conditions (policy DM6). These are essential to ensure that environmental quality is protected and that developers, regulators and utility companies agree on the provision of essential infrastructure (including sewage treatment plants) before the development is approved.

Nature recovery is at risk

Protection for habitats and species is weakened

The LUF notes that the UK is one of the most nature depleted countries in the world and that species abundance in England has reduced by around 33% since 1970. However, the current draft NPPF does not deliver the level of protection needed to deliver the UK’s statutory nature recovery requirements. Requirements on nature protection are weak, isolated, not given the same ‘substantial weight’ as policies on economic growth and development, and not adequately integrated into wider policies.

Important habitats and landscapes are unprotected

The LUF identifies areas expected to contribute to the 30x30 target: ‘... SSSIs in favourable and unfavourable recovering condition, public woodland managed for nature, National Nature Reserves, Landscape Recovery areas, nature reserves, ancient woodlands, land being restored under Biodiversity Net Gain agreements, lakes and restored peatlands.’

However, none of these areas are fully protected under the NPPF. Policy N6 provides limited protection for Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Sites of Special Scientific Interest (SSSIs), Local Nature Reserves, Local Wildlife Sites and irreplaceable habitats, but not National Nature Reserves (NNRs) (including the Kings Series of 25 new or extended NNRs⁸), Habitats of Principal Importance (priority habitats) and areas that support priority species. This contradicts policy N1 which specifies that opportunities to conserve priority habitats and species should be identified in Plans. Also, the NPPF does not reflect the new duties for Protected Landscapes to further nature recovery, even though this is a key expectation in the LUF.

⁸ Natural England, 2026. [Iconic Seven Sisters formally declared England’s new National Nature Reserve](#). London: Crown Copyright.

Protection for SSSIs is also weakened so that only particular features are protected, not the whole site, and protection from the impacts of off-site development has been removed (Policy N6(1b)). This is exacerbated by failure to meet targets for designating new SSSIs to deliver the UK's 30x30 commitment. The SSSI 'designation pipeline', intended to create or extend 50 new SSSIs per year, has delivered only 6 per year on average since 2012 and has virtually stopped since 2023, with many potential sites of national importance for nature already being lost or threatened by development.⁹

Similarly, while Policy S1(1.a.i) allows an exception to meeting housing targets if 'the application of the policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area', the definition of 'areas or assets of particular importance' is too narrow. It correctly includes SACs, SPAs, Ramsar sites, marine sites, SSSIs, Green Belt, Local Green Space, National Landscapes, National Parks, Heritage Coasts, irreplaceable habitats, heritage assets and flood zones, but it should also include National Nature Reserves, Local Nature Reserves, Local Wildlife Sites, Priority habitats and areas supporting Priority species. Protection of these areas, which include vital refuges for threatened species, is essential to meet our statutory target to halt and reverse the decline of biodiversity in the UK, given that one in six species is threatened with extinction. The definition of irreplaceable habitats is also too limited, and would not protect priority grasslands, ancient hedgerows or chalk streams.

Our most valuable wildlife sites can be destroyed

In line with the Planning and Infrastructure Act, NPPF policy N6 now allows developers to pay a fee to destroy or damage any designated biodiversity site if an Environmental Delivery Plan (EDP) is in place and Natural England show evidence of a likely net gain for the targeted conservation features.¹⁰ The aim is for this 'Nature Restoration Levy' to fund strategic compensation for the specific impacted biodiversity features.

The initial focus is on nutrient pollution, with plans to extend this to integrate the current District Licensing Scheme for great crested newts.¹¹ These specific types of compensation can be successful, but in theory the scheme could also be extended to the loss of protected habitats. We do not believe there are any circumstances in which our most valuable wildlife sites (SACs, SPAs, Ramsar sites, SSSIs and Marine Conservation Zones) should be destroyed or damaged under the pretext of compensation under an EDP. It would be technically and biophysically impossible to replace these sites with compensatory habitat without a severe loss of biodiversity which would undermine our statutory targets. These sites are of exceptional importance and contain mature habitats that are the last refuges of many threatened species. Most wildlife would perish when habitat is cleared for development, and only a few of the more mobile species might be able to move to a new site. Development can start before compensation is delivered, and even relatively simple interventions like scrub creation take time.

⁹ Chapman, K., Tait, M. and Davis, R. 2026. [Unprotected nature: Is Natural England failing to protect our most special sites from development?](#) London: Wild Justice.

¹⁰ UK Legislation, 2025. EDPs specifically target SSSIs, SACs, SPAs, Ramsar Sites and Marine Conservation Zones, and protected species. See [Planning and Infrastructure Act 2025, Part 3 Development and nature recovery](#) Clause 99.

¹¹ Defra, 2025. [Implementing the Nature Restoration Fund](#). London: Crown Copyright.

It would take decades or even centuries to replicate a complex, mature, biodiverse habitat such as a wetland or forest in a new location, and it may be impossible to completely replicate the unique local conditions in the habitat that was lost. Safeguards to deliver additional measures if monitoring shows that EDPs are not being achieved would likely come too late to save vulnerable species.

Decision-making is subjective

Both policy S5 and policy N6 allow subjective decision-making: there is no indication of what is an 'unacceptable impact' and what is an 'imperative reason of overriding public importance'. Valuable wildlife habitats and green spaces could therefore be lost if a local decision-maker judges this to be acceptable, or judges the development to be of overriding public importance.

Protection for Protected Landscapes is weakened

The LUF expects Protected Landscapes (National Parks, National Landscapes and the Broads) to play a key role in delivering our biodiversity targets, but NPPF Policy N4 turns a presumption for refusal into caveated support for development, and does not state the duty from the Levelling-up and Regeneration Act 2023 that LPAs should 'seek to further' protected landscape purposes, not just 'have regard' to them. S5(2) further weakens protections for nature by restricting where development can be challenged.

Lack of site-specific assessment and protection / mitigation

The LUF recognises that 'although spatial data can augment on the ground knowledge, it should never replace it. Data needs to be used alongside local knowledge to make the best decisions.' However, the draft NPPF has removed the requirements for site-specific environmental assessments from policy DM2 and Strategic Environmental Assessments from policy PM6. Indeed, the list of evidence requirements in Annex C omits any type of Environmental Assessment, including for carbon, biodiversity, tree surveys, soil, water, and wider ecosystem impacts. Site assessments are vital for LPAs to make informed decisions on whether a proposal aligns with national, regional and local policies on nature recovery and environmental improvement. The standardised national validation requirements in policy DM2 limit the capacity to address important local issues, especially any issues that may have emerged since development plans were adopted, which contradicts the LUF principle of adaptive policymaking informed by the latest evidence. Meanwhile, policies S4 and S5 appear to offer automatic approval for sites close to rail stations or within settlements, without requiring a site assessment.

To avoid loss of important wildlife habitats and species, development proposals should be informed by ecological surveys of each site, with firm protection for priority species and habitats, rather than being automatically approved unless they meet the narrow set of exclusion criteria in policies S4 and S5 and the inadequate safeguards in N6.

This is particularly important given that many brownfield sites are recognised as priority habitats supporting important wildlife populations (and there are moves to exempt brownfield sites from BNG). Proposals should therefore be assessed on a site-by-site basis involving an ecological assessment, rather than being given blanket approval.

Related to this, Policy L2 requires substantial weight to be given to remediating 'despoiled, degraded, derelict, contaminated or unstable land', yet 'derelict land' could have significant biodiversity value. This requires a site survey and a clear caveat to explicitly exclude land that supports priority habitats (including 'Open Mosaic Habitats on Previously Developed Land') and priority species.

Biodiversity Net Gain (BNG)

The LUF anticipates that Biodiversity Net Gain will help to make sure that development leaves the natural environment in a measurably better state than it was in beforehand. It recognises that meeting our ambitious environment targets will require a much greater role for private nature markets, as public payments alone will not be enough for the transformative changes needed. The LUF therefore aims to increase private demand for the environmental services that farmers and land managers can provide.

However, the market for BNG is undermined by the recent announcement that the government will exempt all sites under 0.2 hectares from BNG, which is expected to halve the number of residential developments providing BNG (and could result in far more sites being exempt unless the widely abused 'de minimis' loophole, which allows developers to claim minimal impact without evidence, is also closed¹²). There are also proposals for a blanket exemption of brownfield sites, even though some of these have developed nature-rich 'open mosaic habitats' and support priority species. This is exacerbated by NPPF policies N1 and PM13, which restrict LPAs from setting BNG targets above the 10% statutory minimum except for specific allocation sites with supporting evidence. The 10% minimum is intended to compensate for uncertainty in the BNG methodology and poor delivery on the ground,¹³ and higher targets are needed to deliver a genuine gain for biodiversity. Given that there is currently little or no progress towards the statutory target of halting and reversing biodiversity loss by 2030, any local measures to reduce damage to biodiversity should be welcomed and encouraged, especially as there is no evidence that BNG requirements beyond the minimum have any impact on housing delivery.

Similarly, the draft NPPF defines a new category of 'medium development' up to 2.5 hectares or 49 houses, with the consultation document indicating this could facilitate future relaxation of environmental protections and BNG requirements for this category. This is seriously concerning as it would exempt the vast majority of development sites from BNG and it is unlikely the market would remain viable.

12 Wildlife & Countryside Link, 2026. [No more loopholes: Making BNG work better for nature](#). London: Wildlife & Countryside Link.

13 e.g. see [Property developers installing as few as half of promised ecological features – new report](#). Chapman, K. and Tait, M. 2025.

Green Infrastructure needs stronger protection

The LUF envisions a network of urban green spaces helping with wellbeing, biodiversity, flood protection and cooling during heatwaves, and this is largely supported by NPPF policies N1, CC1 and DP3, which reference the new Green Infrastructure (GI) Standards.

However, high local housing targets place pressure on existing green infrastructure, which needs better protection. It would also be useful to add safeguards into the policies promoting higher-density housing (L1 and L2) to ensure that networks of green and blue infrastructure are created even in high density developments.

Protection for 'valued landscapes' should be reinstated for areas that are valuable to the local community but not formally designated. This could help to protect certain greenfield sites on urban fringes that are technically within settlement boundaries (and thus targeted for automatic development approval) but which are often of great value for both wildlife and people, as they tend to consist of small fields with ancient hedgerows and trees, rather than large expanses of intensive farmland.

Similarly, there should be opportunities to designate land as Local Green Space at any stage of the planning cycle, not only when Local Plans are updated. If land meets the requirements, it should be designated immediately so that it can be safeguarded for the local community.

Recreational space is also inadequately protected in policy S4 and S5. Policy HC7 does not specify how to determine whether an open space is 'surplus to requirements', and section 1c would allow replacement of a nature-rich green space with a sports facility such as playing fields. Also, the requirement for loss of recreational space to be replaced with equivalent quality and quantity has been weakened to equivalent quality and/or quantity. This could lead to a decline in the level of usable/accessible recreational infrastructure provided. The balance to be struck between quantity and quality is complex and extremely location-specific, particularly as reductions in quantity can have cumulative impacts.

Local Green Space (LGS) is vital to protect areas that are much-loved by communities, which provide important health and wellbeing benefits. However, policy HC8 equates protection for LGS to that for Green Belt land, which is now subject to a long list of exemptions where development is allowed including around rail stations, for mineral extraction, engineering operations, transport, electricity and water infrastructure, 'material changes to the use of land' and buildings for sports facilities and recreation.

Food security requires clearer safeguards

While both the LUF and NPPF aim to reduce trade-offs by avoiding land use change on our best agricultural land, the NPPF offers loopholes. Policy N1 requires 'avoiding the use of higher quality agricultural land' but then offers the loophole 'where land of poorer quality is available'. Policy N2 requires proposals to 'Use areas of poorer quality agricultural land in preference to that of higher quality... taking into consideration land which is classified as best and most versatile agricultural land, and its grade' but again stops short of an outright ban on developing high grade land. Stronger protections are needed, with a ban on developing Grade 1 land (which only covers 4.4% of England, some of which is under threat from sea level rise) and a caveat that Grade 2 land (which covers 19% of England) should only be developed in exceptional circumstances.

Energy and climate policies restrict local ambition

NPPF policy PM13 specifies that plans should ‘not cover matters which are already addressed by Building Regulations’ other than in relation to accessibility and water efficiency. This would stop Local authorities setting ambitious requirements for Net zero homes that tackle the carbon impacts of construction and materials as well as the subsequent emissions from heating and powering the building. The building regulations are intended to set minimum standards, not impose an artificial cap on performance. As the rest of the NPPF already ensures that stricter standards would need to be backed by evidence of viability and deliverability, this cap is not needed. Ambitious local standards help to drive innovation (especially in SMEs) and support the development and growth of the green building industry in the UK, while also reducing energy bills to tackle the cost-of-living crisis and fuel poverty.

In addition, this policy conflicts with existing Net zero targets, including the Levelling Up and Regeneration Act 2023 and Section 19(1A) of the Planning & Compulsory Purchase Act 2004 which required LPAs to include policies that mitigate and adapt to climate change. Indeed, research has shown that if we do not tackle both embodied carbon and operational carbon from buildings (as well as reducing unnecessarily high house-building targets beyond 2030), the buildings sector could use up the entire UK carbon budget for achieving the 1.5oC target by 2050.¹⁴ As the NPPF is guidance, not law, local circumstances can justify departures where robust evidence exists. This clause would therefore be open to legal challenge, which could slow down the planning process.

The NPPF is strongly supportive of renewable and low carbon development and electricity network infrastructure (e.g. in policy W3) and the associated need for critical minerals in M1. However, while substantial weight is given to climate benefits, there is no comparable weight for protecting nature. Nature and Net zero are interdependent and must be tackled with equal weight in order to achieve sustainable development. As well as strengthening policy N6, caveats are needed in W3 and M1 to note that this does not outweigh other National Policies for environmental protection. In particular, policy W3 needs to protect deep peat soils, as construction will degrade peat and may increase overall carbon emissions.¹⁵

The LUF notes the advantages of rooftop solar, but this is not reflected in the NPPF. A more strategic approach could be adopted, prioritising the use of rooftops and car parks before farmland and ecologically sensitive habitats.

14 zu Ermgassen, S.O.S.E., Drewniok, M.P., Bull, J.W., Corlet Walker, C.M., Mancini, M., Ryan-Collins, J., & Cabrera Serrenho, A. 2022. [A home for all within planetary boundaries: Pathways for meeting England's housing needs without transgressing national climate and biodiversity goals](#). *Ecological Economics*, 201, 107562. doi: 10.1016/j.ecolecon.2022.107562

15 Smith, J., Nayak, D. R., & Smith, P. 2014. [Wind farms on undegraded peatlands are unlikely to reduce future carbon emissions](#). *Energy Policy*, 66, 585–591. doi: 10.1016/j.enpol.2013.10.066

Water security will benefit from strategic planning

The LUF envisages using enhanced regional and catchment-scale water planning to involve planning authorities in tackling water pollution, flooding and water supply risks, but this is not always supported by the draft NPPF, as discussed below.

Flooding

The LUF notes that one in four properties in England are projected to be at risk of flooding by 2050, under a high emissions scenario, and calls on the government to 'ensure planned land use changes help mitigate and are resilient to future climate change.'

However, the NPPF (policies F4- F7 and Annex F) allows construction of homes, shops, restaurants, schools and hospitals within Flood Zones 2 and 3, if land outside the flood zone is 'not available' and if the flood risk assessment appears to show that the emergency evacuations can take place along 'safe access and escape routes' according to an 'emergency plan'. Also, the 'sequential test' to steer development to less risky areas is no longer applied for areas at risk of surface water flooding, only to flooding from rivers and the sea. As future predictions of flood risk involve high uncertainty, building in flood zones can expose communities to risks of severe flooding, which is becoming more common in the UK.

Policy F7 is seriously flawed. Locating the 'most vulnerable development' on the 'areas of lowest flood risk' does not mean they are safe in absolute terms, only that they are relatively less unsafe than other areas. Flooding of properties is deemed acceptable if they won't require 'significant refurbishment'. The prospect of occupiers and users of houses and businesses having to face repeated flood events, with the consequent impact on their lives, property damage, potentially uninsurable properties, business failures, financial impacts or bankruptcies and consequent issues for mental health and wellbeing, or even death during severe floods, is unacceptable.

The list of 'essential infrastructure' that can be built even on the functional floodplain includes data centres, hydrogen plants and carbon capture and storage facilities, posing obvious risks given the high use of electricity, vulnerable equipment, and risk of electrocution.

Rather than building further developments on floodplains and putting occupiers and surrounding populations at risk, they could be allocated for natural flood management and nature recovery schemes. Reconnecting rivers with their floodplains, where appropriate, can mitigate flood risks downstream and create valuable floodplain mosaics of wetlands, ponds, wet woodland and meadows. Floodplains often play a key role in Local Nature Recovery Strategies, both for habitat creation and to link together other areas of importance for biodiversity.

Water supply

The LUF aims to 'help prioritise investment in locations that reduce the tension between development and environment'. However, this aim could be undermined by the imbalance in priorities in the NPPF.

For example, Policy W4 gives substantial weight to the need for water infrastructure to unlock new developments. However, there are finite constraints on water availability which cannot be addressed simply by building reservoirs or water transfer systems. Caveats are needed to ensure this does not outweigh other National Policies for environmental protection, or the need to prevent over-abstraction of surface and groundwater supplies. To support this, Policy W1 needs to align with Environment Act (2021) ambition to reduce the per capita water use per head of the population by 20% by 2038, using demand management and water efficiency standards.

Similarly, policy E2 gives 'substantial weight' to the economic benefits of new data centres, but not to any associated environmental constraints. As over 80% of new data centres are proposed in water-stressed areas of England,¹⁶ this imbalance could exacerbate water shortages and reduce water flows in streams and wetlands.

Water quality

Water quality is a high priority in the LUF, but NPPF policy S5 appears to allow automatic approval for construction of housing for livestock. As industrial chicken farms are a major source of water pollution, the Environmental Audit Committee recommends a presumption against this form of land use in catchments where nutrient budgets are likely to be exceeded, even where mitigation is proposed.¹⁷

Water quality is also at risk from the moves to discourage application of pre-commencement planning conditions (policy DM6(3)). This could affect delivery of essential sewage treatment infrastructure, as demonstrated in a recent court case challenging development upstream of a Ramsar site where no such infrastructure was planned or funded.

Communities need greater input into plans

Local democracy

The LUF emphasises the importance of community empowerment and incorporation of local knowledge and co-design. However, the current draft NPPF undermines local democracy by allowing the Secretary of State to take over local planning powers or overrule local decisions. Spatial Development Strategies further undermine democracy by determining broad locations for development, allocating housing numbers between LPAs (policy HO2) and proposing changes to the Green Belt. Similarly, NPPF policy DM9 allows Local and Mayoral Development Orders to override the wishes of local communities and may reduce environmental protections.

¹⁶ Body, A., Hayes, O. and Johnson, N. 2026. [Not a drop to drink: How Britain's data centre surge threatens water security](#). London: Global Action Plan.

¹⁷ Environmental Audit Committee, 2022. [Water quality in rivers – Report Summary](#). London: House of Commons Committee.

This risks top-down decisions being imposed on local communities without an understanding of local needs, constraints and priorities. In many cases, the ‘presumption in favour of sustainable development’ funnels power, land and permissions towards developers, at the expense of local people and the environment. This is exacerbated because the current policy on Spatial Development Strategies (SDSs) suggests that development will be prioritised over environmental factors. It is crucial to give local people a say in these decisions and for them to be able to hold the decision-makers accountable through local elections. SDSs should be based on strong and meaningful two-way engagement with the communities in each part of the plan area, with flexibility to allow local constraints, needs and opportunities to be fully taken into account – including safeguarding local green spaces that are valued by the community.

The use of compulsory purchase powers in NPPF policy L1(2) could also undermine local democracy unless there are strong safeguards to prevent loss of sites that are of value to the local community or have biodiversity value.

Ability of LPAs to set ambitious targets

NPPF policies PM6 and PM13 impose constraints on LPAs that ignore local needs and ambitions.

PM6(1b) says that plans should ‘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’. This could require LPAs to have to justify strategic policies such as GI strategies or policies for Net zero homes, and raises the possibility that these could be rejected if the examiners disagree with the justification.

There are further restrictions on local ambition in PM6(1c) and PM13. Limiting quantitative standards to a narrow list (infrastructure provision, affordable housing requirements, parking and design and placemaking) prevents LPAs from setting the ambitious targets on sustainability that are required to address the climate and biodiversity crises, including for Biodiversity Net Gain and Net zero homes, as discussed above. National policies are currently insufficient to fully address these crises, as ecosystems and places vary considerably across England. Environmental quality and biodiversity continue to decline, and we are failing to put in place adequate climate change mitigation and adaptation measures, which often require context-specific local solutions (including those related to the LNRS).

Green Belt

In line with the Land Use Framework, development should target the most appropriate areas, safeguarding land that is of high existing environmental value, or high future nature recovery potential. Yet the NPPF revisions to allow development in the Green Belt (by defining parts of it as ‘grey belt’) risk undermining these goals. While originally badged as previously developed land in rural areas, research by the CPRE and the Community Planning Alliance suggests that the majority of ‘grey belt’ sites targeted to date are on greenfield sites, some of it ecologically rich.¹⁸

¹⁸ Community Planning Alliance, 2025. [Greying the greenbelt: The unnecessary making of a grey, unpleasant land](#). Richmond, UK: Community Planning Alliance.

One of the five purposes of the Green Belt is to focus development in city centres, driving urban regeneration, but this is now ignored. This risks driving development on the edges of settlements, rather than utilising more expensive and challenging inner-city sites. Ironically, freeing up Green Belt land for development may not necessarily increase housing supply if housebuilders simply switch from inner urban development sites to cheaper greenfield sites.

Policy GB1 frames Green Belts as obstacles to development, not as areas that can deliver significant public benefits. There is potential to expand the five core functions of the Green Belt in policy GB2 to include nature restoration and climate resilience, which would help to protect local wildlife sites and biodiverse brownfield open mosaic habitat sites in those areas. Some areas of green belt could be designated as 'wild belt' land allocated to support our nature recovery targets, as suggested by the Wildlife Trusts.¹⁹

Policy GB3 sets the welcome principle that new development should be focused around good public transport systems including rail stations, but there is a risk that this will over-ride protection for habitats, species, designated sites and treasured landscapes. Section 2 also allows allocation of the Green Belt for development where LPAs cannot meet their housing needs on other sites, which risks large losses of Green Belt land, given the potential over-estimation of local housing targets discussed above.

The list of development that is considered to be 'not inappropriate' in the Green Belt in Section 1f of policy GB7 contains some forms of development that clearly could cause harm to the character and functions of the Green Belt, including mineral extraction, engineering operations, transport, electricity and water infrastructure, the very broad category of 'material changes to the use of land' (which could cover far more than playing fields and cemeteries) and buildings for sports facilities and recreation (which could include, for example, large stadiums).

Section 1g would allow major development on 'grey belt' land and Section 1h would allow major development even on Green Belt that does not qualify as 'grey belt', provided that it is near a station. Taken together with the other policies, this could open up large areas of Green Belt to major development, with likely impacts on local health, wellbeing and biodiversity. It would be more reasonable to restrict development to land which is 'grey belt' and near a station and where this would not affect any priority habitats and species or designated sites (with the ecological value of these sites determined by up-to-date professional surveys).

Although the Golden Rules (Policy G8) for development in the Green Belt refer to supporting nature recovery and contributing positively to landscape setting, these provisions are qualitative and lack enforceable ecological performance thresholds.

In Annex E, the approach to identifying areas of the Green Belt that do not contribute to the relevant objectives is flawed, because it would be possible to carve up the Green Belt into small assessment units that by themselves do not meet all the criteria (e.g. only being 'a small part' of the gap between villages, or not being immediately adjacent to a settlement). In this way, the whole Green Belt could be gradually lost in a piecemeal fashion, especially as once the area is 'not completely undeveloped' it is deemed to be no longer Green Belt. Again, the emphasis has moved towards development at any ecological cost, rather than on safeguarding important areas of the green belt to meet other policy goals including our nature recovery commitments.

¹⁹ Wildlife Trusts. [Wildbelt: The Wildlife Trusts' policy briefing](#). Newark, UK: Wildlife Trusts.

Detailed recommendations for revising the NPPF

The LUF is intended to inform national, regional and local land-use strategies and plans, providing more certainty to developers, landowners and communities. The LUF principles will be taken into account in preparing and updating relevant national policy, including the NPPF. The LUF also intends to use Planning Practice Guidance to support Strategic Planning Authorities in securing multiple land use benefits, such as how Spatial Development Strategies should take account of LNRs.

With this in mind, in this section we list specific detailed recommendations for revising the draft NPPF to address the conflicts noted above, aligning it with the LUF and the government's statutory environmental targets and commitments. This is not an exhaustive list, but it aims to highlight the main areas where revision is needed.

Plan-making policies

PM1(1): Add the following purposes for SDSs

- the need for SDSs to address environmental improvement, in line with the requirements for Local Plans in PM2.
- the Planning and Infrastructure Act 2025 requirement for SDSs to meet the need for affordable housing, climate mitigation and adaptation.
- the requirement from the current NPPF that plans and planning decisions should be compatible with international and national statutory obligations. This should include our national and international climate and nature recovery targets.

PM1(2e): 'Identifying broad locations for nature conservation and habitat enhancement, restoration and creation' should refer to Local Nature Recovery Strategies in the relevant areas, in line with the reference to Local Growth Plans in section 2c.

PM1(2f): After 'flood risk management schemes' add '(including natural flood management)', to encourage uptake of NbS.

PM2(1a): Delete 'by no more than ten measurable outcomes', as this restricts the ability of LPAs to set SMART targets for monitoring progress.

PM2(1a.iii) (long term objectives): Change 'including for large scale development proposals' to 'including for large scale development and environmental improvement proposals'.

PM2(4): The Secretary of State should not be given the power to interfere in the Local Plan-making process.

PM6(1e): Reinstate the explicit requirement from the current (2024) NPPF for Strategic Environmental Assessments to demonstrate how the plan has addressed relevant economic, social and environmental objectives and avoided significant adverse impacts, following the mitigation hierarchy.

PM10(3): It is vital that spatial decisions are taken with local democratic accountability, and mechanisms for ensuring this must be put in place so that the needs and priorities of local communities are not overridden.

PM11(1c): Add a requirement on 'Planning effectively for cross-boundary environmental improvement schemes with significant implications across neighbouring areas, including protection and enhancement of critical natural infrastructure networks (including natural flood management schemes) and implementation of Local Nature Recovery Strategies and catchment management plans.'

PM13(1b): Delete clause 1b. Add a clause stating that until building regulations universally achieve net zero buildings, local planning authorities may adopt standards in local plans which support national climate change targets, including those that go beyond current and future building regulations.

PM14 (Spatial Development Plans) and **PM15** (Local Plans): Modify clause 1d in both PM14 and PM15 to 'does not duplicate, substantively restate or modify the content of national policies for decision-making, except where this enables more ambitious local policies to tackle urgent environmental or social challenges.'

PM14(2a): Change 'delivering growth' to 'delivering growth and environmental improvement.'

PM14(2b): Add Local Nature Recovery Strategies, the Environment Act 2021 to the list of relevant strategies.

PM14 and **PM15:** Add a clause to test the adequacy of community engagement in SDSs and Local Plans.

PM15(2a) (Local Plans): Expand 'delivering growth' to 'delivering growth, affordable housing and environmental improvement and meeting nature recovery, climate change mitigation and adaptation goals.'

Decision-making policies

DM1: Development proposals must demonstrate how they contribute to environmental goals set out in law. Early engagement must identify constraints and opportunities for nature recovery and must demonstrate alignment with LNRS.

DM2: Strengthen DM2 and Annex C to include the full list of necessary environmental information (including EIAs, SEAs, ecological surveys, tree surveys etc) and implement this via the Building Regulations. Add that LPAs have the power to request additional information where there is evidence to justify this, such as when circumstances have changed since requirements were laid out in the relevant adopted plans.

DM3(1d): Delete the instruction that ‘Decisions on development proposals should not be delayed in order to secure advice from a statutory or internal consultee beyond their statutory deadlines unless there is insufficient information to make the decision or more detailed advice may enable an approval rather than a refusal’ until resource constraints have been addressed by restoring funding for Natural England and the Environment Agency to the level needed to discharge their statutory duties.

DM6: Delete ‘Conditions that are required to be discharged before development commences should be avoided, unless there is a clear justification.’ Pre-commencement planning conditions are essential to prevent ecological harm. Habitat surveys, ecological assessments, method statements, Construction Environmental Management Plans, plans and budgets to provide essential infrastructure such as sewage treatment, and compensation strategies such as BNG all need to be seen and signed off before work begins.

DM7: It is dangerous to assume that all regulatory regimes will operate effectively. Add a clause allowing LPAs to refuse development if cumulative or location-specific impacts will breach environmental limits such as nutrient neutrality, even if permits have been issued separately.

DM8(2): Add that breaches of planning permission that cause environmental harm should not be granted retrospective planning permission, and enforcement action should be pursued. LPAs need more resources for enforcement.

Achieving sustainable development

S1(1.a.i): Add National Nature Reserves, Local Nature Reserves, Local Wildlife Sites, Priority habitats and areas supporting Priority species to the list of ‘areas or assets of particular importance’ which can justify restricting development in the plan area.

S4(1) and S5(1): Change the requirement for adverse impacts to ‘substantially’ outweigh benefits to ‘outweigh’ (deleting ‘substantially’).

S4(2a ii): Protection for ‘valued landscapes’ should be reinstated in the list of exemptions, to cover areas that are valuable to the local community but not formally designated.

S5(1a-j): Unless the flaws in the method of calculating housing targets are corrected (see policies HO1 and HO2) and policy N6 is strengthened as specified below, the long list of exemptions for policy S5 (development in rural areas) should be deleted to protect priority habitats and species from further loss and damage. The priority is to delete S5(j) (unmet need / failure to meet housing targets), given the strong likelihood that this exception will apply in many cases due to the unrealistically high housing targets imposed in many areas.

S5(1a): For agricultural buildings, add a caveat that there should be a presumption against construction of industrial poultry units in catchments where nutrient budgets are likely to be exceeded, as recommended by the Environmental Audit Committee.²⁰

²⁰ Environmental Audit Committee, 2022. [Water quality in rivers – report summary](#). London: House of Commons Committee.

Delivering a sufficient supply of homes

HO1, HO2: Add a clause to allow LPAs to penalise developers for ‘land banking’ (where they hold onto consented land until house prices increase, or sell on land after land prices increase) to unlock the 1 million homes that already have planning consent.

HO2(3b): Modify to allow housing targets to be decreased as well as increased, to take account of local constraints on land availability and competing needs for land.

Annex D: The proposed target based on 0.8% of current stock will result in exponentially increasing targets as more homes are built, eventually using up all available open space. There should be a test to determine whether sufficient homes have been built to meet population projections (or at least to finite long-term targets), in which case the targets can be reduced accordingly. Also, unbuilt consents (currently estimated as 1 million homes) should be subtracted from housing targets and the buffer should be reduced to 10% or lower to reflect these unbuilt consents.

Housing Delivery Test Rulebook: Housing requirements in new SDSs should not replace those in Local Plans that are still in date. For areas with an up-to-date plan, the housing requirement should remain as the lower of the adopted housing requirement or the relevant local housing need figure. The proposed changes would immediately put a Local Plan into the position of failing to meet identified housing need and being opened up to unplanned development, risking environmental harm.

HO4: Add ‘Where appropriate...’ to allow flexibility for areas where large scale development is not possible or appropriate, such as dense urban areas. It is not clear how policy HO4 is compatible with the overall aim to restrict development outside settlements.

HO11: Delete clause (e). There is no justification in allowing isolated houses to be built in the countryside simply because they have high architectural merit.

HO13(2): Add the ability to penalise failure to complete housing delivery within reasonable timescales (as well as failure to start construction).

HO13(3b): Add a caveat that taking a ‘flexible approach’ to the consenting framework for large scale development should not result in poorer quality design or weaker environmental standards or protections.

Beyond the NPPF, speed up housing delivery by providing extra resources for LPAs and consultees to allow them to speed up planning decisions, and tackling skills shortages in construction.

Building a strong effective economy

E2(2b): Add a requirement to consider environmental limitations and constraints including water availability, biodiversity and carbon storage in ecosystems, which may make development unsuitable in certain areas.

E3: Add a caveat that reuse of agricultural buildings should mitigate any ecological impacts on individual sites, e.g. on bird and bat roosts, based on site surveys.

Ensuring the vitality of town centres

TC3: The sequential test should be retained to limit the proliferation of out-of-town shopping centres.

Securing clean energy and water

W1(1): Explicitly mention the need to align with Environment Act (2021) ambition to reduce the per capita water use per head of the population by 20% by 2038, using demand management and water efficiency standards. **W1(2):** Delete the second sentence, which currently implies that energy and water infrastructure can be implemented in areas not allocated as being suitable in the Local Plan, or add the requirement for local consultation and engagement to understand and reflect local priorities, needs and constraints before this is done.

W3: Add a caveat that a Strategic Environmental Assessment is required for hazardous installations including nuclear power plants. Add a presumption against infrastructure development on peat, as this will increase overall emissions. Add a caveat that this does not outweigh other National Policies for environmental protection.

W4(1): Add a caveat that this does not outweigh other National Policies for environmental protection.

W4(2): Replace 'Applicants should not be required to demonstrate the need for water infrastructure developments' with 'Options for demand management to reduce or avoid the need for large infrastructure should be tested via Strategic Environmental Assessment.'

Planning for a sufficient supply of minerals

M1: Add a caveat that this does not outweigh other National Policies for environmental protection.

Making effective use of land

L2(1a): As 'despoiled, degraded, derelict, ... land' could have significant biodiversity value, add a caveat to exclude land that supports priority habitats (including 'Open Mosaic Habitats on Previously Developed Land') and priority species.

L2(3) and **L3(4):** Add a caveat that although the development footprint should be compact, it should also incorporate a network of green and blue infrastructure in line with DP3(1d).

L3: The principle of maximising density to reduce development footprints does not need to be limited to the areas around stations.

Protecting Green Belt land

GB2: Add a new core function of the Green Belt to contribute to nature restoration and climate resilience, including potential allocation of some areas as 'wild belt' land allocated to support our nature recovery targets.

GB7(1f): Delete mineral extraction, engineering operations, transport, electricity and water infrastructure from the list of development allowed in the Green Belt, as these will clearly adversely affect the character of Green Belt land, and provide caveats to limit 'material changes to the use of land' and 'buildings for sports facilities and recreation' to small developments with low impact.

GB7(1g and 1h): Modify to restrict Green Belt development to land which is 'grey belt' and near a station and where this would not affect any priority habitats and species or designated sites.

GB8(1a): The affordable housing floor for schemes subject to the Golden Rules should be at least 10% more than Plan policies for other housing types, with a minimum of 45%, including at least 15% houses for social rent.

GB8(3): Site-specific viability assessments should not be used to allow developers to evade their obligations under the Golden Rules. If land is to be released from the Green Belt it must always deliver exceptional value for the public.

GB8: Add a clause specifying that development of Green Belt land should be accompanied by the identification of new sites for nature recovery, which are protected in perpetuity from development. Specify a minimum percentage of the development to be allocated for a connected network of biodiverse habitats in line with the LNRS (e.g. 25%).

Annex E: Set a cap on the overall percentage of Green Belt that can be lost, to prevent carving up the Green Belt into small assessment units that by themselves do not meet all the criteria (e.g. only being 'a small part' of the gap between villages, or not being immediately adjacent to a settlement). Remove the criteria that once the area is 'not completely undeveloped' it is deemed to be no longer Green Belt, as this will create a spiral of loss.

Achieving well-designed places

DP1: Design codes must incorporate locally-appropriate requirements for nature and climate. They should also enable LPAs to set higher minimum standards than national policy, including >10% BNG and Net zero homes.

DP2: The welcome recognition of the need for community engagement and consideration of local context could be expanded to consider how to integrate landscaping with Local Nature Recovery Strategy priorities, to support local species and habitats, and other actions to support biodiversity.

DP4: Beyond the NPPF, more resources are needed for LPA enforcement teams to ensure that design stipulations are met, given evidence of widespread failures.²¹

²¹ Wild Justice's [Lost Nature report](#) revealed that just 53% of the promised features for ecology are actually installed on construction sites.

Promoting sustainable transport

TR3(1a): Strengthen the current wording that requires environmental impacts to be ‘identified, assessed and taken into account’ to ‘identified, assessed and avoided or mitigated, including habitat fragmentation’.

Promoting healthy communities

HC1(1d): Add ‘nature-rich green space’ to the list of open space categories to reflect the health and wellbeing benefits of access to nature-rich green space.²²

HC7: Change ‘and/or’ back to ‘and’ to ensure full compensation for any recreational space that is lost.

HC7(1a): State what criteria should be taken into account when assessing whether open space is surplus to requirements, including the requirement for public consultation and the need to consider not just current use, but future needs as population sizes and demographics change.

HC7(1c): Modify to explicitly prevent replacement of a nature-rich green space with a sports facility such as playing fields, unless there is a full ecological assessment and mitigation or compensation as a last resort.

HC8: Clarify that the long list of exemptions allowing development on Green Belt land does not apply to designated Local Green Space.

Pollution, public protection and security

P1: Consider additional risks including Artificial Light at Night, as evidence suggests it causes severe harm to many species.

Managing flood risk and coastal change

F5, 6, 7 and Annex F: The exception test should be tightened to disallow development of any premises where people live or work in Flood Zone 3 under any circumstances, and apply stricter limits in Flood Zone 2. In particular, data centres (now classed as ‘essential infrastructure’) should not be built in Flood Zone 3. All forms of flood risk, including surface water and groundwater flooding, must be considered in the test.

Table 2, Flood Risk Vulnerability Classifications: Add water-compatible biodiversity schemes and natural flood management to the list of water-compatible development schemes.

²² Smith, A., Hafferty, C. and Seddon, N. 2023. [Embedding nature recovery in the Levelling-up and Regeneration Bill](#). Agile Initiative Research Brief, University of Oxford.

F8(1): Delete the caveats 'in ways which are proportionate to the nature and scale of the proposal' and 'wherever possible', which provide unnecessary loopholes. All SuDS systems are capable of providing multifunctional benefits unless they are simply an underground tank and pipe, which this policy aims to avoid.

F8(2b): Clarify that the SuDS standards should apply for the lifetime of the development.

F8(3): Strengthen the wording to require developers to avoid culverting 'wherever possible', not 'unless there are compelling reasons to do so'. Where this cannot be avoided, appropriate compensation through BNG must be provided for all developments of any size.

Conserving and enhancing the natural environment

N1: Reinstate 'protecting and enhancing valued landscapes' (in the current NPPF's para 187) for treasured landscapes that are not formally designated.

N1(1c): Delete 'where that would be consistent with other policies in this Framework' as other policies do not have this caveat, and it could be used to accord lower weight to nature protection than to other policies.

N1(1c): Add a ban on developing Grade 1 farmland and a requirement for exceptional circumstances to develop Grade 2 land.

N2(1a): Delete footnote 69, which places unacceptable limits on BNG requirements that exceed the statutory minimum, to enable an appropriate response to the biodiversity crisis.

N2(1b): Include a presumption against loss of the highest grade farmland (Grade 1 and 2), rather than just taking the grade into consideration.

N2(1d): For conserving existing natural features, replace 'wherever possible' with 'unless, in rare cases, there are exceptional and well-evidenced reasons why this would not be possible'.

N2(1f): Replace 'Minimise impacts on biodiversity' with 'Avoid impacts on biodiversity'. Strengthen the wording to 'Development proposals should incorporate integrated nest boxes (commonly known as swift bricks) into their construction unless, in rare and exceptional cases, there are compelling technical reasons which prevent their use, or would make them ineffective;' to reduce the potential for exemption misuse. Add an equivalent requirement to incorporate hedgehog highways (small holes in fences) into all new developments. This is vital to save hedgehogs from extinction, as urban areas are now their stronghold but they need to travel up to 2 km each night through urban gardens to meet their food requirements.²³

²³ Wembridge, D., Johnson, G., Al-Fulajj, N. and Langton, S. 2022. [The State of Britain's Hedgehogs 2022](#). London: British Hedgehog Preservation Society.

N4: Restate the current position that protected landscapes have the highest status of protection. Change the wording so that LPAs should 'seek to further' protected landscape purposes, not just 'have regard' to them. Revert to the previous wording where both the tests of 'Exceptional circumstances' and 'in the public interest' have to be legally met, not just one. The public interest test should also include the value that protected landscapes provide to the public for health, wellbeing, interaction with nature, aesthetic value and sense of place, and their expected future role in delivering nature recovery. Remove Footnote 71, which opens up the possibility of approving development if compensation is offered, as it provides another loophole for unsuitable development.

N6(1a.ii): Add safeguards to define where Environmental Delivery Plans cannot be used to enable damage to designated nature sites, including (as a minimum) irreplaceable habitats, or where it is not feasible to recreate a habitat of equivalent quality and species composition and ensure the successful movement of dependent species from the old habitat to the new one before the development commences.

N6(1b): Restore protection for SSSIs as a whole, not just 'features of special scientific interest': otherwise, the context-specific nature of ecosystems such as mosaic habitats is not recognised. Restore the reference to development 'within or outside' a SSSI to protect against offsite impacts. Add National Nature Reserves to this category.

N6(1c): Extend protection for sites of local importance for nature to all those that meet the locally-agreed criteria (including Local Wildlife Sites, County Wildlife Sites, Sites of Nature Conservation Importance, SINCS etc) even if they were designated after the last development plan was adopted.

N6: Add a new section to provide protection for Habitats and Species of Principal Importance.

Annex B: Expand the definition of irreplaceable habitats to include priority grasslands, ancient hedgerows and chalk streams.

Expand the definition of 'International, national and locally designated sites of importance for biodiversity' to include National Nature Reserves (NNRs), which otherwise are not offered any protection by the NPPF. Defra's 'Confirmed Criteria for 30x30 on land in England' includes SSSIs, SACs, SPAs, NNRs, and Ramsar sites.

Beyond the NPPF: Introduce a new Part N of the Building Regulations to require nature-friendly design features as standard, which would provide greater certainty and consistency than reliance on discretionary planning conditions.

Transitional arrangements approach to decision-making Annex A Section 2

We disagree that policies in existing Local Plans that are 'inconsistent in any way' with the new national decision-making policies must be given very limited weight. Existing Local Plans, some of which could be very recently developed, have been developed in close consultation with local stakeholders and support local democracy, taking account of local needs and constraints. Given the number of policies in the draft NPPF that prioritise growth and development over environmental safeguards, we believe that existing Local Plan policies should be allowed to stand if they provide greater environmental or social protection than the new NPPF.

Leverhulme Centre for Nature Recovery



Leverhulme Centre
for Nature Recovery

About LCNR


The ongoing loss and degradation of nature is one of the greatest challenges of our time. To halt and reverse this global biodiversity decline, the Leverhulme Centre for Nature Recovery was created as a hub for innovative research on nature recovery nationally and worldwide. It brings together experts from disciplines across the University of Oxford, including geography, ecology, social science, finance, economics, psychiatry, anthropology, artificial intelligence, statistics and earth observation. Our team collaborates on a range of projects, working with national and international partners.


Funder acknowledgement

The work of the Leverhulme Centre for Nature Recovery is made possible thanks to the generous support of the Leverhulme Trust.

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