



**Leverhulme Centre**  
for Nature Recovery

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# Aligning the draft National Planning Policy Framework with the Land Use Framework

This policy brief compares the draft revisions to the [National Planning Policy Framework](#) (NPPF) for England with the [Land Use Framework](#) (LUF), highlighting common goals but also potential conflicts. It identifies specific needs for greater policy alignment to deliver multiple goals for housing, infrastructure, climate, nature, food and water. Full details are in an [accompanying report](#).

## 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.

## Shared goals of the LUF and NPPF

The LUF is a vital tool for supporting delivery of our statutory climate and biodiversity targets, a resilient food system and housing and infrastructure requirements. It is based around four principles that aim to deliver multifunctional landscapes while taking account of local knowledge, needs and constraints.

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. close to stations and avoiding sensitive habitats) whilst protecting and enhancing the environment. The proposed revisions to the NPPF also support sustainable development through more focus on incorporating green and blue infrastructure into new developments, an end to issuing new licenses for fossil fuel extraction, and stronger requirements to deliver affordable homes.

## Potential conflicts between the NPPF and LUF

Analysis has revealed several important areas where the draft NPPF needs strengthening to align with the LUF principles, especially for meeting statutory biodiversity targets and empowering local communities.

### Imbalance between economic, environmental and social goals

The overarching issue is the imbalance between the three pillars of sustainable development in the NPPF, with “substantial weight” typically given to accelerating housing and infrastructure delivery (seen as drivers of economic growth), but rarely to protecting environmental quality and delivering social benefits.

For example:

- Protection for local green space, recreational open space and wildlife habitats has been weakened.
- Water quality is put at risk by restricting the use of pre-commencement planning conditions to ensure delivery of vital infrastructure such as sewage treatment plants.
- Water use and carbon emissions are not considered when approving new development, including for energy and water-hungry data centres
- Policies to protect high-grade farmland are weak.
- Housing and infrastructure development on floodplains is still permitted (provided an emergency evacuation plan is in place), putting people and property at risk of repeated flooding.

In the long term, the intertwined impacts on biodiversity loss, climate change, pollution, food insecurity, human health and wellbeing could cause financial risks and economic losses that undermine the growth agenda these policies aim to support.<sup>1</sup>

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<sup>1</sup> 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

### Unachievable local housing targets undermine strategic planning

A crucial underpinning problem is the proposed method for calculating annual housing targets (NPPF Annex D). This is set at 0.8% of the housing stock at the time of assessment multiplied by a house affordability factor, giving an average rate of 1.5% across all local authorities and a high of 5% (in Kensington and Chelsea).<sup>2</sup> It has no relationship with projected future population growth or economic growth in the area, and little flexibility to account for local constraints. Also, because it is based on existing housing stock, building more homes will simply increase the next target. The target will never decrease, no matter how many homes are delivered or how little open space remains.

This method is likely to result in unachievable targets for many urban areas, due to constraints on available land. Even where sufficient land is allocated, houses may not be delivered for reasons beyond the control of the local planning authority (LPA), including a shortage of skilled construction workers, high energy and material costs, a weak housing market due to the cost of living crisis, and control of build-out rates by developers to keep prices high.<sup>3</sup> It is estimated that there are one million unbuilt homes with planning consent,<sup>4</sup> but the local housing targets do not account for this. Yet if sufficient homes are not allocated in the Local Plan or the allocated homes are not built, the LPA will fail the Housing Delivery Test and be forced to operate a presumption in favour of speculative development, effectively losing a degree of local democratic control over housing allocations. This could result in poorly planned development with adverse biodiversity impacts, poor public transport connections or lack of supporting infrastructure.



More widely, evidence shows that the housing crisis in England is not primarily due to undersupply of housing, but to low wage growth, cuts in housing benefit, lack of social housing and the lack of motivation for developers to reduce prices.<sup>5</sup> Developer practices such as maintaining strategic portfolios of land,<sup>6</sup> controlling delivery rates and using viability assessments to negotiate reductions in the provision of affordable housing all mean that housing cost is unlikely to fall as more houses are built.

2 Analysis based on the recommended method using the most recent datasets in May 2026

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.

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

## Protection for biodiversity is seriously weakened

The NPPF provides no protection for Habitats and Species of Principal Importance (priority habitats and species), or for National Nature Reserves (including the King's Series of 25 new or extended National Nature Reserves<sup>7</sup>). It also does not reflect the new duties for Protected Landscapes to further nature recovery.

Protection for Sites of Special Scientific Interest (SSSIs) now only applies to certain features, not the whole site, and the use of protective buffer zones is weakened. This is part of a pattern in which 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 now virtually stopped, leading to potential sites of national importance for nature being lost or threatened by development.<sup>8</sup>

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.<sup>9</sup> The initial focus is on nutrient pollution,<sup>10</sup> but in theory this could be extended to the loss of protected habitats which are often the last refuges for rare and threatened species. This would be very risky and is unlikely to succeed in practice. Development can start before compensation is delivered, but it takes time for new habitats to reach the target state at which they can support a wide range of wildlife. Complex environments such as woodlands and wetlands may take decades or even centuries to recreate, and it may be impossible to completely replicate their unique local conditions. Most species perish when sites are cleared for development, with only a few of the more mobile species potentially able to find a new site. Safeguards to deliver additional measures if monitoring shows that EDPs are not being achieved would likely come too late to save vulnerable species.

This shift is framed as a move away from site-specific conservation towards a more landscape-based strategic approach. However, successful nature recovery depends on protecting existing high quality core sites and vulnerable species within connected habitat networks. Relaxing planning rules to automatically allow certain types of development, e.g. within settlements or close to stations, without explicitly stating the need for a site assessment risks exacerbating biodiversity loss.



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

8 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.

9 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.

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

Nature is also under threat from further weakening of the Biodiversity Net Gain (BNG) system due to the accumulation of new exemptions over successive rounds of planning reform (such as increasing the site threshold from 0.1 to 0.2 hectares). While the end to a much-abused exemption for self-build is welcome, evidence suggests that developers are also taking undue advantage of the existing ‘de minimis’ exemption, which allows them to self-declare lack of impact without evidence.<sup>11</sup> The draft NPPF exacerbates these issues by limiting BNG to the statutory minimum 10%, except for specific site allocations that are ‘fully justified and deliverable’. It also defines a new category of ‘medium’ development (under 2.5 hectares) which could be exempted in future. This would further damage the offsite BNG market, seen in the LUF as a key tool for private sector funding of nature recovery.

Taken together, these changes seriously undermine delivery of our statutory targets to halt and reverse biodiversity decline and to protect 30% of land and sea for nature by 2030, and they risk cementing the UK’s status as one of the most nature-depleted countries in the world.

### Local democracy is undermined

The new regional Spatial Development Strategies could play an important role in more strategic land-use planning, including through supporting Local Nature Recovery Strategies. However, they also set housing targets and take over many of the other functions of Local Plans, with no explicit input by the local communities affected.

This weakening of local democracy is reinforced by the removal of decision-making powers from locally-elected representatives via the Planning and Infrastructure Act, and the continued reliance on centralised, nationally-determined housing targets and planning policy. The presumption in favour of development in certain locations (e.g. in settlements and around stations) without the need to consider any local constraints also limits local democratic control.

In addition, local authorities are now prevented from setting ambitious goals that go beyond national minimum standards, including for zero carbon homes and biodiversity net gain, where local ambition is vital to deliver our national targets.

### Recommendations for enhanced policy alignment

Key recommendations are summarised below, with further details and suggested changes to the wording for each NPPF policy in the [accompanying report](#).

#### Restore the balance between economic, environmental and social goals

To deliver sustainable development, “substantial” weight must be given to environmental and social goals as well as economic ones. The requirement for a Strategic Environmental Assessment should be reinstated as a vital part of development planning. Loopholes must be closed and policies strengthened to fully protect high grade farmland, stop building houses in flood zones, avoid siting infrastructure and housing in areas without adequate water supplies, and give weight to carbon and biodiversity impacts. Local authorities need to retain the ability to use pre-commencement planning conditions for environmental protection, especially to ensure delivery of vital infrastructure such as sewage and water treatment.

<sup>11</sup> Wildlife & Countryside Link, 2026. [No more loopholes: Making BNG work better for nature](#). London: Wildlife & Countryside Link.

## Adjust the method for calculating local housing need

In Annex D, there should be a test to determine whether sufficient homes have been built to meet population projections or other long-term targets, in which case the targets can be adjusted accordingly rather than infinitely increasing. Also, local authorities should be able to include unbuilt houses that have been given planning permission in meeting their targets.

Rather than penalising local authorities for failing to meet housing supply targets, it would be more effective to tackle the construction skills shortage, penalise developers for failing to deliver consented homes, further strengthen delivery of affordable and social rent housing, and provide greater resources for planning authorities and consultees to speed up delays in the system.

## Strengthen nature protection to meet statutory biodiversity targets

A landscape-oriented approach to nature recovery must include protection of specific sites. Protection in policy N6 needs to cover National Nature Reserves and priority habitats and species, and full protection for SSSIs should be restored. Site-specific environmental assessments are vital to find out if there are any priority species or habitats present, so that the mitigation hierarchy can be followed (avoid harm, reduce harm, mitigate harm, compensate for harm as a last resort). Designated sites should remain fully protected, with EDPs only used for matters where compensation may be technically feasible, such as for nutrient neutrality, not for habitat loss.

## Restore mechanisms to enable meaningful local democratic input

Local communities must have opportunities to input meaningfully into the formulation of Spatial Development Strategies, and there should be a mechanism for them to hold policymakers to account.

Protection for local green spaces, recreational open spaces and valued local landscapes needs to be restored to the previous level.

Policy 13 needs changing so that local authorities can set environmental targets that exceed the statutory minimum, including for BNG and zero carbon homes.

## Complementary actions

To support these NPPF revisions, we need to support the nature recovery market by reducing BNG exemptions, closing the de minimis loophole, continuing to apply BNG to biodiverse brownfield sites, and introducing BNG for Nationally Significant Infrastructure without further delay. We also need full resourcing for future designations to protect nationally important sites threatened by urban development.

## About us

The ongoing loss and degradation of nature is one of the greatest challenges of our time. In response, the Leverhulme Centre for Nature Recovery (LCNR) was created in 2022 as a hub for innovative research on nature recovery. It brings together experts from a broad range of disciplines across the University of Oxford. The team collaborates with partners in communities and organisations around the world.

## What is nature recovery?

We define nature recovery as the activity of helping life on Earth to thrive by repairing human relationships with the rest of the natural world.

## Our aims


- To understand the societal, biophysical, policy and systemic factors that enable or challenge nature recovery
- To collaborate with partners in case study landscapes to test and enhance frameworks, technologies, and tools for effective, inclusive, scalable, nature recovery delivery that also provides for society and its wellbeing
- To establish an inclusive nature recovery community at Oxford, leveraging its intellectual capital and interdisciplinary convening power to address key debates and challenges in the field.



**Leverhulme Centre**  
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