Government response to the proposed reforms to the National Planning Policy Framework and other changes to the planning system consultation

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Overview of consultation responses

The consultation was open for twelve weeks from 16 December 2025 to 10 March 2026. It was published on GOV.UK. Responses were accepted via online survey, via email and via written letter.

The consultation received 20,572 responses, including campaign responses. ‘Campaign responses’ refer to responses prepared by campaign groups on specific issues, to which respondents attach their names. For the purpose of the statistical summaries for each question, campaign responses have only been counted once, regardless of how many individuals submitted campaign responses. Please note the totals may not add up to 100% due to rounding methods.

The tables below provide a breakdown of the general consultation responses by type of respondent (Table 1), and a breakdown of the campaign responses received (Table 2).

Table 1. Types of consultation respondent

Types of respondents	Number of responses
Private individuals	1,654
Local authorities	343
Neighbourhood planning groups/town or parish councils	274
Developers	151
Private sector organisations	463
Professional bodies	218
Interest groups/voluntary organisations	464
Other	354

Not specified	278
Total	4,199

Table 2. Campaign responses

Campaigns	Number of responses
Adfree Cities	194
Almshouse Association	12
Britain Remade	48
CAMRA	47
Coal Action Network	1,832
Communities Against Factory Farming	1,566
Community Land Trust	59
Community Planning Alliance	138
CPRE	140
Don’t Urbanise the Downs	848
Hampshire & Isle of Wight Wildlife Trust	5,347
More Sustainable Farming	10
Police CPI	54

RF Info	472
RSPB	5,253
Save Newick Village	44
Swift Groups	48
Transport Action Network	244
Violence Against Women and Girls (VAWG)	17
Total	16,373

This document provides a summary of the consultation responses received. All responses were carefully considered and taken into account, but this document does not attempt to capture every point made, nor does it cover comments on aspects of policy that fall outside the scope of the consultation. This document sets out the changes the government has made in response to the main points raised in the consultation. Where the government has not made changes in response to feedback, the reasons are also explained.

An Easy Read version of the consultation was published on 2 February 2026 with fewer, easier to understand questions. We received 8 responses which followed the questions set out in the Easy Read version. These responses have been considered and included in the analysis of the policy areas to which they relate.

We have provided a statistical summary of respondents for each question where relevant, although responses to some questions have been consolidated where there are significant similarities in responses to avoid repetition. We have indicated throughout this document where responses to questions have been grouped.

A number of respondents chose not to answer some questions. For the purposes of the statistical summary of responses to each question, we have excluded those respondents that did not answer the question.

The government has had regard to its responsibilities under the Equality Act 2010 in considering the changes that it has made to the Framework and in incorporating policy for traveller sites in light of the consultation responses received.

The case for non-statutory national policy

Question 1: Do you have any views on how statutory National Development Management Policies could be introduced in the most effective manner, should a future decision be made to progress these?

A total of 1,196 respondents answered Question 1.

Government response

Views were mixed. Many respondents agreed that National Development Management Policies (NDMPs) could reduce duplication in local plans, simplify the policy framework and support more consistent decision-making, particularly when applied to clearly defined national issues.

Private sector and developer respondents were generally supportive, citing benefits for delivery, investment certainty and reduced delays. Local authorities, neighbourhood planning bodies, interest groups and many individuals raised concerns about a "one-size-fits-all" approach, including potential impacts on local democratic accountability and the ability to respond to local needs.

Across all groups, respondents emphasised the need for clear scoping, robust guidance, and appropriate transitional arrangements. There was also strong cross-sector emphasis on the need for clarity on policy hierarchy, weight and the interaction between NDMPs and development plans.

The government has considered these responses and acknowledges both the potential benefits of NDMPs and the concerns raised. The matter continues to be kept under review and should a decision be taken to progress statutory NDMPs, the government will ensure that their scope is clearly defined, supported by guidance and transitional arrangements, and that their role in relation to development plans is set out clearly to provide certainty for decision-makers and communities.

Changes to structure and content

Question 2: Do you agree with the new format and structure of the draft Framework which comprises separate plan-making policies and national decision-making policies?

A total of 1,011 respondents answered Question 2. Of those, 34% strongly agreed, 26% partly agreed, 18% neither agreed nor disagreed, 10% partly disagreed and 13% strongly disagreed. This indicates broad support for the proposal.

Government response

Many respondents said the new structure and policy numbering improve usability and clarity, and that separating plan-making and decision-making policies helps set clearer expectations and supports consistent decision-making. Some noted that these functions are closely interrelated in practice, with certain topics, such as health and infrastructure, not fitting neatly into a single category. They warned that a strict split could create gaps or duplication or weaken policy effectiveness.

Those who disagreed were chiefly concerned that clearer national decision-making policies could reduce local flexibility and democratic accountability where national policy takes precedence. Some also raised concerns that removing paragraph numbers would make the document harder to navigate.

The government has considered these responses and considers that the proposed format and structure are integral to establishing a comprehensive set of national policies on general planning matters, and to making policy more rules-based and certain. In response to consultation, the government has made improvements to usability, by incorporating some footnotes into the main text and adding lettered policy identifiers to the contents page to aid navigation. The government does not consider that the separation of plan-making and decision-making policies will create gaps or duplication and considers that clarity on the role and application of each will support effective implementation alongside the development plan.

Question 3: Do you agree with the proposed set of annexes to be incorporated into the draft Framework?

A total of 1,034 respondents answered Question 3. Of those, 20% strongly agreed, 28% partly agreed, 31% neither agreed nor disagreed, 11% partly disagreed and 11% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

Respondents supported the annexes for improving clarity and consistency by consolidating technical guidance and definitions. However, some cautioned that this approach could increase complexity and bureaucracy if not carefully implemented. There were also calls for specific improvements or additions to the content of individual annexes, which were considered alongside their wider policy areas.

The government has considered these responses and has concluded that the proposed annexes, except that which had been considered on standardised inputs in viability assessment, should be added to the Framework. They incorporate key elements of Planning Practice Guidance that are essential to the operability of the Framework's policies. These include the standard method for assessing local housing need, the identification of grey belt land, and additional flood zone and flood risk vulnerability tables. Standardised inputs into viability assessment will remain in Planning Practice Guidance.

Chapter 1 – Introduction

Question 5: Do you agree with the proposed approach to simplifying the terminology in the Framework where weight is intended to be applied?

A total of 1,133 respondents answered Question 5. Of those, 32% strongly agreed, 30% partly agreed, 18% neither agreed nor disagreed, 8% partly disagreed and 12% strongly disagreed. This indicates broad support for the proposal.

Government response

While support was widespread, some respondents argued that a hierarchy of terms would better reflect the relative priority of different issues across policies. Some respondents highlighted the benefits of greater clarity, consistency and accessibility through simplified terminology. Others raised concerns about how the simplified terminology would interact with statutory duties.

The government has considered these responses and has decided to take forward the proposed approach to simplifying terminology in the revised Framework. The potential benefits of a hierarchy of terms have been noted, but on balance the government considers that this is outweighed by the greater clarity of a standardised approach. The weight to be given to specific considerations remains a matter for decision-makers, to be determined on the facts of individual cases.

Chapter 2 – Plan-making policies

The plan-making chapter sets out the policy approach for the new plan-making system. The foundations of the reforms to the local plan-making system were set out in the Levelling-up and Regeneration Act 2023, with the detailed proposals and direction of travel for the implementation of the new system consulted on shortly after. The new system came into force in March 2026 through the Town and Country Planning (Local Planning) (England) Regulations 2026 and other accompanying regulations.

The legislative reforms for the introduction of Spatial Development Strategies are set out in the Planning and Compulsory Purchase Act 2004 as amended by the Planning and Infrastructure Act 2025 and will be supported by forthcoming secondary legislation.

As a result, much of the policy set out in this chapter flows from the legal framework of the new plan-making system and has been developed and refined through previous consultation and engagement with stakeholders.

Responses for Questions 6, 7, 8 and 15 have been grouped.

Question 6: Do you agree with the role, purpose and content of spatial development strategies set out in policy PM1?

A total of 1,179 respondents answered Question 6. Of those, 17% strongly agreed, 36% partly agreed, 20% neither agreed nor disagreed, 15% partly disagreed and 12% strongly disagreed. This indicates broad support for the proposal.

Question 7: Do you agree that alterations should be made to spatial development strategies at least every 5 years to reflect any changes to housing requirements for the local planning authorities in the strategy area? a) If not, do you think there should be a different approach, for example, that alterations should only be made to spatial development strategies every five years where there are significant changes to housing need in the strategy area?

A total of 1,065 respondents answered Question 7. Of those, 22% strongly agreed, 30% partly agreed, 17% neither agreed nor disagreed, 15% partly disagreed and 16% strongly disagreed. This indicates broad support for the proposal.

Question 8: If spatial development strategies are not altered every five years, should related policy on the requirements used in five year housing land supply and Housing Delivery Test policies, set out in Annex D of the draft Framework, be updated to allow housing requirement figures from spatial development strategies to continue to be applied after 5 years, so long as there has not been a significant change in that area’s local housing need?

A total of 902 respondents answered Question 8. Of those, 28% strongly agreed, 23% partly agreed, 29% neither agreed nor disagreed, 8% partly disagreed and 13% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Question 15: Do you agree with the policies on maintaining and demonstrating cross-boundary cooperation set out in policy PM10 and policy PM11?

A total of 980 respondents answered Question 15. Of those, 30% strongly agreed, 31% partly agreed, 23% neither agreed nor disagreed, 9% partly disagreed and 8% strongly disagreed. This indicates broad support for the proposal.

Government response

Responses showed support for the proposed role of spatial development strategies (SDSs), particularly in providing a clear strategic framework for cross-boundary issues such as housing, economic growth, infrastructure, and environmental priorities. Respondents called for greater clarity on the scope of SDSs and their relationship with local plans and emphasised the importance of long-term certainty.

Some respondents considered that regular updates were necessary to keep SDSs responsive to changing housing need and wider circumstances. Others argued that a requirement to alter strategies every five years could be disruptive, increase burdens on strategic planning authorities (SPAs) and create uncertainty for investment. Some respondents favoured an evidence-led approach, with alterations triggered by significant changes in housing need or other strategic factors.

Those who supported updating the Housing Delivery Test and five-year housing land supply policies to allow housing requirement figures from SDSs to continue to be applied after 5 years considered this would provide greater stability in housing requirement figures. Respondents also called for clearer definition of “significant change” and for regular reviews to ensure alignment with local need, infrastructure capacity and environmental constraints.

There was strong support for the policies on effective cross-boundary cooperation, alongside calls to avoid duplication, delay and ambiguity, to ensure early and inclusive engagement with key stakeholders and communities and to provide further clarity on implementation.

The government has considered these responses and agrees that SDSs should provide a clear and stable strategic framework. The Framework has been amended (see paragraph 6 of Chapter 1) to clarify how plan-making policies apply to SDSs, including their relationship with local plans. Guidance will be published to further support authorities operating across the two tiers, including on the relationship between broad locations identified in SDSs and subsequent site allocations in local plans. To support long-term certainty for planning, infrastructure delivery and investment, the minimum expected plan period for SDSs has been increased from at least 20 years to at least 25 years.

In response to concerns about burden and disruption, policy has been amended so that SPAs will be expected to begin preparing an alteration or replacement SDS where there has been a significant change in circumstances including a significant change in housing need and, in any event, after 7 years from adoption. Guidance will also be published to support SPAs in meeting expectations on monitoring. This approach maintains up-to-date plans, by ensuring that no SDS should be more than approximately 10 years old, while supporting stability and reducing unnecessary burdens. PM1(2)(e) has been amended to recognise the role that SDSs can play in relation to historic environment strategic issues. Further, the reference to the provision of minerals has been removed from policy PM1(2)(f) because it is not a type of infrastructure and a corresponding change has been made to PM1(2)(b) to recognise the importance of other development including mineral extraction. Other minor changes have also been made to policy PM1 to aid clarity and ensure consistency with policy PM2 on local plans, including a reference to the Secretary of State's intervention powers.

The government recognises the case for greater certainty in how SDS housing requirement figures interact with 5-year housing land supply and Housing Delivery Test policies, including where local housing need has not changed significantly. After carefully considering consultation responses, the government has decided to maintain the current approach which means that only housing requirement figures from SDSs that are under 5 years old can be used in Housing Delivery Test or 5-year housing land supply calculations. The government considers that a five-year period strikes an appropriate balance between providing stability for plan-making while ensuring that the housing requirement figures used for calculations remain responsive and reflect local need.

The government also agrees with respondents on the importance of effective cross-boundary cooperation. Policies PM10 and PM11 are considered to provide an appropriate framework that supports a flexible and proportionate approach, while enabling timely plan-making. A minor change has, however, been made to PM10(1)(a) to make clear that plan-making authorities should engage with relevant bodies to identify where additional capacity from existing infrastructure is needed as well as new infrastructure. Guidance will also be published to support authorities in meeting the expectations in these policies. The government will also continue to work with relevant government departments and infrastructure bodies to improve alignment between long-term infrastructure planning and development plan-making, including through wider infrastructure planning reforms.

Question 9: Do you agree with the role, purpose and content of local plans set out in policy PM2?

A total of 1,096 respondents answered Question 9. Of those, 19% strongly agreed, 36% partly agreed, 19% neither agreed nor disagreed, 15% partly disagreed and 11% strongly disagreed. This indicates broad support for the proposal.

Government response

Respondents supported the structured approach set out in the policy, noting it should support a faster, more streamlined plan-making process and lead to more up-to-date plans. However, there were concerns about the achievability of the 30-month timescale, particularly considering resourcing constraints and wider system changes. Respondents also called for greater clarity on the relationship between local plans and SDSs.

Some raised concerns about the potential restrictiveness of part 1d in relation to the ability to include other policies in local plans, while others supported the more consistent and streamlined approach it should provide. This was also with reference to the role of national decision-making policies set out in policy PM6. A number of respondents suggested the policy should more clearly reflect the role of local plans in addressing environmental and climate matters.

The government has considered these responses and notes the overall support for policy PM2. The policy is intended to provide a clear framework for the role, purpose and content of local plans, and the consultation confirms that it broadly achieves this. The direction of the policy builds upon the legal framework established through the Levelling-up and Regeneration Act 2023 and subsequent regulations, and has been refined through previous consultation and engagement.

The government acknowledges concerns about the 30-month local plan preparation timeframe. It previously consulted on and responded to comments on this through the Government response to the proposed plan-making reforms: consultation on implementation - GOV.UK. The government's position remains that this strikes the right balance between speed and deliverability, and that the wider package of plan-making reforms, including legislative changes and updated guidance, will support authorities in meeting these timescales.

Some respondents sought greater clarity on the roles of local plans and SDSs. As noted above in the response to Question 6, changes have been made to clarify how plan-making policies apply to SDSs and their relationship with local plans. The government will also prepare guidance to support plan-makers on this relationship.

Concerns regarding part 1d on the use of other local policies, and its interaction with national decision-making policies, have been considered alongside policy PM6 and are addressed in the response to question 11 below.

The government recognises calls to strengthen references to environmental matters. While the Framework should be read as a whole, and environmental and climate policies are set out elsewhere, policy PM2 has been amended to clarify that local plans should seek to both conserve and improve the environment at a local level.

Several minor amendments have been made to improve clarity and consistency. These include adding a reference to strategic sites in Part 1a to reflect the new definition of these sites in the Framework and the consequent changes to that part of the policy.

Amendments have also been made to the section of the policy on the use of joint local plans to reflect the approach set out in the December 2024 Framework, recognising that the use of joint plans can be considered.

Question 10: Do you think that local plans should cover a period of at least 15 years from the point of adoption of the plan? a) If not, do you think they should cover a period of at least 10 years, or a different period of time. Please explain why.

A total of 1,019 respondents answered Question 10. Of those, 69% agreed and 31% disagreed. This indicates broad support for the proposal.

Government response

Respondents supporting a minimum 15-year period for local plans emphasised the importance of long-term certainty and stability for housing delivery, infrastructure planning and economic growth, and particularly for supporting the delivery of large and complex development. Those favouring shorter periods highlighted the benefits of flexibility and adaptability, evidence being more relevant and up-to-date, and reduced resource burdens on local authorities. There was broad support for plans to be able to be responsive to local context and issues.

Some respondents noted that streamlined plan-making in the new system should help keep plans up-to-date and more frequently prepared, and because of this it would be more appropriate for plans to cover shorter plan periods than currently. Those who supported a shorter plan period generally agreed a minimum 10-year plan period would be appropriate.

The government has considered these responses and notes the overall support for longer plan periods. However, we recognise the range of comments supporting flexibility for plan-makers. For these reasons we consider that plan periods should allow for both long-term planning and local flexibility to be able to be responsive to local circumstances. The policy has therefore been revised to expect local plans to cover a minimum period of 10 years from adoption, while making clear that longer time periods continue to be appropriate where this supports, for example, the delivery of strategic development and infrastructure.

This approach ensures plans remain adaptable and proportionate, while still enabling longer-term objectives to be planned for where necessary. Consequential changes have been made to policy H03 to align with this approach.

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

A total of 1,138 respondents answered Question 11. Of those, 31% strongly agreed, 26% partly agreed, 18% neither agreed nor disagreed, 14% partly disagreed and 11% strongly disagreed. This indicates broad support for the proposal.

Government response

Respondents who agreed with the approach to national decision-making policies noted that preventing the duplication of national policies in plans would help streamline plan-making, reduce costs and burdens on local authorities, enhance clarity and consistency, and allow local plans to focus on genuinely local issues.

But concerns were raised about potential rigidity in the drafting, particularly the inability to 'modify' national decision-making policies, where more detailed or locally specific policies may be justified. Some respondents linked this to policy PM2 and the circumstances in which other local policies can be included in local plans. Some respondents considered the national decision-making policies were, in places, too high level or vague to be able to apply effectively, and could leave gaps in addressing locally specific or sector-specific issues.

Some respondents also commented on whether national decision-making policies should be statutory to allow for more robustness in decision-making. The response to question 1 above sets out more detail on the potential for statutory National Development Management Policies in the future.

On other matters set out in PM6, clarification was sought on requirements relating to digital plan publication and on expectations for environmental assessment. Some respondents also considered existing Framework wording on clear policy drafting should be taken forward into the new Framework.

The government has considered these responses and welcomes the overall support for the policy approach. The purpose of national decision-making policies, as set out in the consultation, remains unchanged. However, the government recognises concerns that the drafting, by seeking to prevent the modification of national decision-making policies, could impose an inappropriate degree of rigidity. The policy wording has been amended so that plans not 'modifying' national policies has been replaced with plans not including policies that ‘are inconsistent’ with national policies. This is considered to provide a degree of flexibility to plan makers, where it would be appropriate to add additional detail to a local policy, and seeks to address concerns raised on the use of other policies set out in PM2. However, to help ensure national decision-making policies are implemented effectively, plan policies should not be inconsistent with national policies.

The government has considered suggestions to carry forward existing Framework wording on policy drafting. It does not consider this wording is necessary to include as plan-making policy, and no change is proposed in this respect.

On expectations around digital plan publication, part of the policy clarifies that plans should be published in a searchable digital format, but this does not preclude publication in other formats such as PDF or hard copy. Regulations 88 and 89 of the Town and Country Planning (Local Planning) (England) Regulations 2026 set out what plan makers must do when making documents available, including the requirement to make documents available for inspection in their offices, and make copies available on request. This is supported by recent guidance on making local plan documents publicly available, which sets out further explanation for plan publication and accessibility.

Regarding part e of the policy, the government does not consider it necessary to include further detail on matters such as reasonable alternatives, as these are already clearly provided for in Strategic Environmental Assessment legislation and existing and forthcoming guidance.

Finally, a criterion of policy PM8 concerning the use of tools, methods and templates has been moved into this policy so that it applies more broadly to plan-making. The policy has been revised to also include reference to the consideration of the use of other digital planning software and resources by plan makers. This supports wider objectives of streamlining and digitising the plan-making process.

Question 12: Do you agree with the approach to initiating plan-making in PM7?

A total of 883 respondents answered Question 12. Of those, 19% strongly agreed, 32% partly agreed, 32% neither agreed nor disagreed, 9% partly disagreed and 8% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

Respondents supported the clear, structured and transparent approach set out in the policy, including the use of defined timetables, milestones and standardised tools. Concerns focused on the perceived rigidity of the timetable, the ability of authorities to meet the 30-month timeframe, and the potential for the new streamlined plan-making process to reduce scrutiny and public engagement. Some respondents also identified issues with references to ‘elected members’, noting this does not reflect all plan-making authorities.

The government has considered these responses and welcomes the overall support for policy PM7. We note the concerns raised on the 30-month timeframe and these have been addressed in response to Question 9 above.

In relation to engagement, the government does not consider that a faster, streamlined approach will reduce public involvement. The new plan-making system increases requirements for consultation, including a new requirement for early engagement with stakeholders on how they want to be involved in the preparation of local plans. Authorities are also expected to set out a community engagement strategy for plan preparation, and new guidance on public participation for the new plan-making system has recently been published, supporting these changes.

In response to points on governance, policy PM7 has been amended to remove the reference to ‘elected members’ and replace ‘key’ stages with ‘appropriate’ stages for sign-off. These changes provide clarity without altering the overall approach. No further changes are proposed.

Question 13: Do you agree with the approach to the preparation of plan evidence set out in policy PM8? Please provide your reasons, particularly if you disagree.

A total of 995 respondents answered Question 13. Of those, 23% strongly agreed, 35% partly agreed, 24% neither agreed nor disagreed, 11% partly disagreed and 8% strongly disagreed. This indicates broad support for the proposal.

Government response

Respondents supported the emphasis on proportionate, relevant and up-to-date evidence, the reuse and updating of existing evidence, and joint working to reduce burdens. Calls were made for clearer guidance on the application of these principles. Concerns included the potential for reduced evidence quality, insufficient attention to local or environmental issues because of standardised evidence, and restrictions on submitting new evidence at examination.

The government has considered these responses and notes the overall support for policy PM8 in providing principles for plan evidence preparation. It agrees that further guidance will help support implementation and will publish this in due course. On new evidence at examination, the policy allows for new evidence when requested by the inspector, which the government considers provides appropriate flexibility while avoiding delay.

Parts of policy PM8 has been amended to improve clarity, including some redrafting of parts 2b and 2c and part 3. These changes do not significantly change the intent of the policy.

The provision on making use of relevant tools, methods and templates has been moved to policy PM6 so it applies more broadly across plan-making, with an added reference to the use of digital planning software and resources, supporting the wider objective of streamlining and digitisation. No further substantive changes are proposed.

Question 14: Do you agree with the approach to identifying land for development in PM9? Please provide your reasons, particularly if you disagree.

A total of 1,108 respondents answered Question 14. Of those, 19% strongly agreed, 27% partly agreed, 18% neither agreed nor disagreed, 13% partly disagreed and 22% strongly disagreed. This indicates broad support for the proposal.

Government response

Respondents supporting the policy noted that it provides a clear and consistent framework for identifying land, and improving transparency and certainty. Concerns focused on the requirement to identify the “most appropriate” sites, which was seen as onerous and inconsistent with the tests of soundness, and on the applicability of the policy to different plan types, including SDSs, and minerals and waste plans. Some respondents also argued that the policy should include more explicit protections for certain types of land.

The government has considered these responses and acknowledges the range of views expressed. The purpose of policy PM9 is to set out the procedural approach to identifying and assessing land, and it should be read alongside the wider Framework and supporting guidance, which address matters such as environmental protection in detail. For this reason, no changes are made in response to calls for additional policy content on land protection.

The reference to identifying the ‘most appropriate’ sites has been removed to respond to concerns this would place significant burdens on plan makers and would be inconsistent with the tests of soundness.

Additional wording has been included to clarify that the approach when identifying land should be proportionate to the type of plan being prepared, and to set out how spatial development strategies should identify broad locations for development. The policy title has been updated to refer to the ‘assessment’ of land alongside the identification of land, to better reflect its purpose.

Question 16: Do you agree that policy PM12 increases certainty at plan-making stage regarding the contributions expected from development proposals?

A total of 964 respondents answered Question 16. Of those, 18% strongly agreed, 34% partly agreed, 27% neither agreed nor disagreed, 11% partly disagreed and 9% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

Respondents generally supported plans setting out clear policy requirements for the contributions expected from development. Respondents considered this necessary to increase certainty by helping developers understand what is expected, enabling policy requirements to be reflected in land values, improving transparency, and supporting faster decision-making.

However, respondents also stressed the need to retain sufficient flexibility at application stage. This reflected concerns that site circumstances can change over time and that information may only become available at application stage. Respondents considered such flexibility particularly important for complex or specialist schemes and noted that an overly rigid approach could undermine broader housing supply objectives.

The government has considered these responses and agrees that, while plans should clearly set out policy requirements for the contributions expected from development, sufficient flexibility is needed at application stage where viability challenges arise.

The government will continue to promote clarity at the plan-making stage on expected contributions in order to reduce the need for negotiation at decision-making stage. However, Planning Practice Guidance on viability will continue to make clear that viability assessment in plan-making should be proportionate and should not require individual testing of every site or assurance that individual sites are viable.

Revisions have been made to policy DM5 to ensure that appropriate flexibility remains available at application stage where justified (see response to Questions 25 and 26).

In addition, PM12(2)(b) has been amended to clarify that policy requirements may apply to sites of any size, rather than only strategic sites.

Question 17: Do you agree that plans should set out the circumstances in which review mechanisms will be used, or should national policy set clearer expectations?

A total of 887 respondents answered Question 17. Of those, 13% strongly agreed, 24% partly agreed, 27% neither agreed nor disagreed, 19% partly disagreed and 17% strongly disagreed. This indicates mixed views, with support and opposition broadly balanced.

Government response

Respondents generally recognised that review mechanisms can help local planning authorities seek compliance with policies on the contributions expected from development over the lifetime of the project.

Some respondents expressed that a clearer national framework for review mechanisms could improve consistency, transparency and accountability. However, there were strong concerns that such mechanisms should not be overly prescriptive or burdensome, and should retain flexibility to reflect local circumstances, scheme complexity, and other factors. Some respondents also expressed concern about the impact of review mechanisms on supply, particularly on SME-led development or specialist forms of development.

The government has considered these responses and agrees that a clearer and more consistent framework for review mechanisms could improve transparency and support more effective operation in practice. At the same time, the government recognises the importance of ensuring that such mechanisms remain proportionate and flexible.

The government will therefore maintain the ability for local plans to set out the circumstances in which review mechanisms will be used for development proposals where contributions are proposed to be reduced below requirements set out in plan policies. We intend to publish further guidance to support their use in due course.

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

A total of 1,604 respondents answered Question 18. Of those, 14% strongly agreed, 12% partly agreed, 12% neither agreed nor disagreed, 8% partly disagreed and 54% strongly disagreed. This indicates broad opposition to the proposal.

Government response

Those supporting the policy highlighted that local standards can create inconsistency between areas which can add delay and cost to planning applications. They considered that limiting such standards would simplify the planning system, enabling local plans to focus on local issues and reducing complexity for applicants.

In contrast, a majority of respondents argued that PM13 is overly restrictive on local planning authorities, particularly in relation to local standards on energy efficiency. Many of those respondents raised concerns that this could hinder local authorities' ability to address climate change in their areas.

Respondents also provided feedback on a number of specific matters where they thought local standards were justified, including embodied carbon, overheating, flooding and fire safety. Some respondents sought greater clarity on the specific standards that would be in and out of scope of this policy, noting that 'construction' could be a widely interpreted term.

The government has considered these responses and agrees that development plans should focus on local matters and should not duplicate other control regimes. This is essential to support a more streamlined planning system and effective implementation of development plans. PM13 has therefore been retained, but subject to a number of amendments that respond to the feedback received.

In relation to energy efficiency, the government recognises the concerns raised and the evidence provided. A new sub-paragraph, PM13(1)(b)(iii), has been introduced to set out the circumstances in which local standards for energy efficiency may be justified. This reflects and supersedes the existing policy contained in the 2023 Written Ministerial Statement titled *Planning – Local Energy Efficiency Standards Update*. In light of this approach, the government will not commence s.43 of the Deregulation Act 2015 at this time.

In addition, a second paragraph has been added to the policy (replacing the previous sub-paragraph (c)) to provide further clarity on quantitative standards which do not relate to matters covered by Building Regulations. In response to feedback that 'construction' is an ambiguous term, the reference to this has been removed. In its place, the new paragraph acknowledges that standards may need to be set for matters beyond those named in the opening paragraph, but makes clear that these should be proportionate, with a clear and robustly costed rationale, and not affect the viability and deliverability of development (most of these tests echoing those which apply to local energy efficiency standards). Paragraph 2 applies the same tests to quantitative standards which relate solely to the internal layout of buildings. The tests set out in this paragraph strike a balance between allowing a wider range of local standards to be set compared to what was consulted upon, while expecting these to be particularly well justified to avoid disproportionate costs on development, and to limit widespread variations in the standards which apply.

Question 19: Do you agree that the tests of soundness set out in policies PM14 and PM15 will allow for a proportionate assessment of spatial development strategies, local plans and minerals and waste plans at examination? a) If not, please explain how this could be improved to ensure a proportionate assessment, making it clear which type of plan you are commenting on? Please explain why.

A total of 891 respondents answered Question 19. Of those, 18% strongly agreed, 26% partly agreed, 30% neither agreed nor disagreed, 13% partly disagreed and 13% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

Respondents recognised the need for separate policies and tests for SDSs, and for local plans, minerals and waste plans because of the different roles, purpose and timeframes of those plans. Respondents however identified some inconsistencies between the two policies which could create some confusion.

It was also noted that parts of the existing tests of soundness had not been taken forward into the revised tests, such as the reference to local plans being based on appropriate evidence. Some respondents considered those elements should be retained in the revised tests.

On definitions, terminology and wording used in the soundness tests, respondents noted these must be clear, consistent and accessible to ensure fair, efficient, and effective plan examination.

The government has considered these responses and acknowledges the balanced nature of views. It agrees that the tests of soundness in policies PM14 and PM15 should be clear, coherent and applied consistently. To support consistent application in practice, further guidance on the tests of soundness for SDSs and local plans will be published in due course.

The government recognises that inconsistencies between the tests of soundness in policies PM14 and PM15 could create some confusion and uncertainty in their application. It also notes the strong support for retaining alignment with some elements of the existing tests of soundness.

In response, the government has amended policy PM15 to revert the proposed 'realistic' test to an 'effective' test, aligning it with policy PM14 and the December 2024 Framework. It has also reintroduced wording to clarify that plans should be based on appropriate evidence. In policy PM14, additional text has been added to make clear that the tests should be applied in a proportionate way, aligning them with provisions in policy PM15.

Changes made to policy PM6 related to 'inconsistency' with national decision-making policies have also been reflected in the relevant parts of policies PM14 and PM15. Further minor amendments have been made to improve consistency between policies PM14 and PM15.

These changes do not materially alter the overall approach, which is to have distinct tests of soundness which are appropriate for SDSs and local plans, but will improve clarity, consistency and certainty in their application, supporting more efficient plan-making and examination.

Question 20: Do you have any specific comments on the content of the plan-making chapter which are not already captured by the other questions in this section?

A total of 684 respondents answered Question 20.

Government response

A broad range of responses were received, but particularly covering matters related to supplementary plans, local plans and neighbourhood plans. Feedback was also received through this question on matters addressed elsewhere in the consultation. Where that is the case, comments have been covered in the relevant sections of the government response.

In relation to supplementary plans, the issue raised most frequently was the removal of supplementary planning documents, which had been consulted on previously. Local planning authorities were advised in earlier consultations to review existing supplementary planning documents and determine whether their content should remain as guidance or be incorporated into new-style local plans. No substantive new evidence or arguments were presented that would warrant revisiting this approach, and as a result no changes are proposed to the policies on supplementary plans.

On local plans, responses largely duplicated issues raised elsewhere in the consultation and have therefore been addressed in the relevant sections of the government response. We received some comments on matters that are governed by legislation, including the requirement to commence preparation of a new local plan within five years of the adoption of the previous plan. As these are legislative issues there are no specific policy implications to be addressed through this consultation.

Comments were received on minerals and waste plans, including on updating the National Planning Policy for Waste. This consultation does not include revised policies for waste, which are set out separately. The government intends to consult on revisions to these policies as soon as possible, with the same objectives of improving clarity, usability and consistency.

Respondents also commented on proposed changes to minerals policy compared to the existing Framework. These matters are addressed in the responses to the relevant questions in the chapter on facilitating the sustainable use of minerals.

Respondents generally supported retaining neighbourhood plans as a community-led tool that enables local engagement and reflects local priorities. Some however raised concerns that the proposed changes could reduce their role and influence through a more limited scope and greater prescription, reducing flexibility to respond to local circumstances. Concerns were also raised about the removal of paragraph 31 of the existing NPPF, particularly in relation to potential conflicts between local and neighbourhood plan policies, and a need for clearer guidance on how these should be resolved.

In relation to the deletion of paragraph 31, the government notes that the approach to resolving conflicts between policies, including the principle that the most recent policy takes precedence, is already established in section 38(5) of the Planning and Compulsory Purchase Act 2004. Planning Practice Guidance will be updated to clarify how this and other relevant provisions should be applied in practice.

Some respondents raised concerns about the drafting of policy PM17 and its relationship with existing legislation. It was noted that the policy could introduce ambiguity by going beyond statutory requirements. In response policy PM17 has been amended to make clear that neighbourhood plans should have regard to national decision-making policies, rather than accord with them. This ensures consistency with the statutory framework and should avoid unnecessary ambiguity.

Chapter 3 – Decision-making policies

Question 21: Do you agree with the principles set out in policy DM1?

A total of 1,036 respondents answered Question 21. Of those, 23% strongly agreed, 33% partly agreed, 19% neither agreed nor disagreed, 15% partly disagreed and 10% strongly disagreed. This indicates broad support for the proposal.

Government response

Respondents generally supported encouraging early, meaningful and inclusive community engagement, alongside a proportionate approach to minimum information requirements. Many highlighted the benefits of improved certainty, transparency and faster decision-making. However, some local planning authorities argued that the policy should go further by mandating pre-application consultation, while others raised concerns about the quality of supporting information and its impact on decision-making. Professional bodies also noted that the policy could place greater emphasis on early engagement with infrastructure providers and registered providers to support planning for infrastructure and affordable housing.

The government has considered these responses and acknowledges the strong support for early engagement, proportionate information requirements and the use of planning statements in policy DM1. It will retain the proposed approach, including the emphasis on early and meaningful engagement. The government will strengthen references to engagement with infrastructure and housing providers to support early consideration of infrastructure and affordable housing needs. It considers that the existing drafting provides appropriate flexibility on pre-application engagement and does not mandate its use in all cases, while still expecting proportionate engagement in line with the policy’s objectives.

Responses for Questions 22 and 23 have been grouped.

Question 22: Do you agree with the policy DM2 on information requirements for planning applications?

A total of 1,038 respondents answered Question 22. Of those, 25% strongly agreed, 29% partly agreed, 19% neither agreed nor disagreed, 15% partly disagreed and 12% strongly disagreed. This indicates broad support for the proposal.

Question 23: Do you have any views on whether such a policy could be better implemented through regulations?

A total of 572 respondents answered Question 23.

Government response

Respondents supported standardising information requirements for planning applications, citing benefits for clarity and consistency. However, some local planning authorities and professional bodies considered policy DM2 to be overly restrictive and emphasised the need to retain the ability to request additional information on a case-by-case basis. Concerns were also raised that Annex C was not sufficiently comprehensive, particularly in relation to the range of information requirements needed to support decision-making policies in Chapters 18 and 19, or those information requirements covered by other regulatory regimes. In response to Question 23, most respondents supported setting validation requirements through policy rather than relying solely on legislation, as this was seen to offer greater flexibility.

The government has considered these responses and acknowledges the support for a more standardised and policy-led approach. It will retain the core approach in policy DM2, as it provides greater clarity and consistency. The government considers that the policy, supported by Annex C, establishes a clear baseline for information requirements, while not preventing local planning authorities from requesting additional information through local lists supported by development plan policies.

The government has considered concerns regarding the scope of Annex C and clarifies that its purpose is to identify specific information requirements arising from national decision-making policies which should be reflected in local validation lists, rather than to provide an exhaustive list of all potential requirements. In response to feedback, Annex C has been updated to include assessments needed to support decision-making in Chapters 18 and 19.

Annex C does not duplicate requirements already set out in legislation, such as Design and Access Statements, and does not seek to capture all information that may be required through local plan policies. The government will continue to keep under review the case for setting further national validation requirements through legislation or policy.

Question 24: Do you agree with the principles set out in DM3?

A total of 987 respondents answered Question 24. Of those, 23% strongly agreed, 27% partly agreed, 20% neither agreed nor disagreed, 16% partly disagreed and 14% strongly disagreed. This indicates broad support for the proposal.

Government response

Respondents generally supported policy DM3. Most comments focused on the role of statutory consultees in criterion 1d. Some developers argued that decisions should not be delayed pending consultee responses and that engagement should be limited to what is necessary. In contrast, many professional bodies, including statutory consultees, emphasised resource constraints and sought stronger recognition of the need for meaningful engagement beyond minimum regulatory requirements. Concerns were also raised that the policy could lead to decisions which do not adequately consider health and safety issues, such as flood risk and major accident hazards. There were also requests for clearer guidance on what constitutes “necessary” consultation.

The government has considered these responses and is retaining policy DM3, recognising the strong overall support. The policy balances the need for timely decision-making with the need for adequate input from statutory consultees but has been amended to make clear that a delay to making a decision may be necessary where additional information is required to ensure impacts on health and safety are properly understood.

The government recognises that the statutory consultee system does not always function as intended and can slow decision-making.

On 18 November 2025, the government published a consultation on reforms to the statutory consultee system, which sought views on reducing the scope of referrals to some of the largest statutory consultees and removing statutory consultee status from certain bodies. These proposals aim to significantly streamline the planning system by reducing unnecessary statutory consultations, empowering local planning authorities, and focusing resources where they are most needed. We aim to respond to this consultation later this year and regulations will follow consultation outcomes.

The government also plans to publish a consultation later this year on a planning fee surcharge to support statutory consultee resourcing.

Responses for Questions 25 and 26 have been grouped.

Question 25: Do you agree that policy DM5 would prevent unnecessary negotiation of developer contributions, whilst also providing sufficient flexibility for development to proceed?

A total of 946 respondents answered Question 25. Of those, 13% strongly agreed, 24% partly agreed, 27% neither agreed nor disagreed, 19% partly disagreed and 17% strongly disagreed. This indicates mixed views, with support and opposition broadly balanced.

Question 26: Do you have any further comments on the likely impact of policy DM5: Development viability?

A total of 643 respondents answered Question 26.

Government response

Respondents expressed differing views in response to Question 25. Some respondents, particularly developers or those acting on their behalf, emphasised the need for flexibility, suggesting that DM5 could be too rigid and may not allow sufficient scope for site-specific viability assessments where circumstances change or key information only emerges after a plan has been adopted. Others, including a number of local authorities, called for tighter controls to prevent reductions in affordable housing and other public benefits, suggesting the policy should be strengthened in this regard.

Respondents frequently commented on the proposed list of circumstances in which a viability assessment may be justified under policy DM5(2). Some expressed concern that terms such as ‘significantly’ and ‘substantially’ were ambiguous and could lead to disputes. While some respondents suggested the list should be expanded, others suggested that it should be a closed list.

Responses to Question 26 reinforced these themes. Respondents also called for clear national guidance and for review mechanisms to be transparent, proportionate and applied consistently, although some questioned whether they would be appropriate on all sites. The importance of sufficient local planning authority capacity and capability was also emphasised.

The government has considered these responses and agrees that it is important to strike a balance between reducing unnecessary negotiation and maintaining sufficient flexibility. The updated Framework retains a strong emphasis on plan-stage viability, including an expectation that viability assessments submitted at application stage refer back to those undertaken in plan-making. This reflects support for a more consistent, plan-led approach and for reducing negotiation during decision-making.

At the same time, the government recognises that sufficient flexibility is needed where viability challenges arise. Targeted changes have therefore been made to policy DM5(2) to provide greater clarity about when those circumstances may apply, alongside clarificatory changes to policy DM5(5).

The government also recognises the need for greater clarity and consistency in the application of viability policy. However, as set out in response to Question 212 at Annex B – Viability: Standardised inputs in viability assessment, the government has decided to not take forward a technical annex to include standardised inputs in viability assessment. While we understand the need for a consistent framework for evaluating development proposals and certainty in the viability assessment process, we consider that further engagement is needed with local planning authorities, developers, development surveyors and other key stakeholders. This will ensure that any changes are thoroughly tested prior to implementation. Viability Planning Practice Guidance will continue to provide guidance on standardised inputs – and policy DM5 is clear that viability assessment should be carried out in accordance with this guidance. The government appreciates the feedback received and will use it to inform a wider update of the Planning Practice Guidance, to be published as soon as possible.

In relation to review mechanisms, the government proposes that these should be considered through the local plan process under policy PM12. Policy DM5(6) has therefore been removed. Further guidance on the use of review mechanisms will also be published in due course.

Overall, the government considers that this approach strikes an appropriate balance between providing greater certainty and consistency, while retaining sufficient flexibility to respond to site-specific circumstances and support developments which deliver the maximum contributions towards affordable housing and other infrastructure. The government will also work with the Planning Advisory Service to ensure that training and resources are available to support local planning authorities in viability assessment.

Responses for Questions 27 and 28 have been grouped.

Question 27: Do you have any views on how the process of modifying planning obligations under S106A, where needed once a section 106 agreement has been entered into, could be improved? a) If so, please provide views on specific changes that may improve the efficacy of S106A and the main obstacles that result in delay when seeking modification of planning obligations.

A total of 610 respondents answered Question 27.

Question 28: Do you have any views on how the process of modifying planning obligations could be improved in advance of any legislative change, noting the government's commitment to boosting the supply of affordable housing. a) If so, please provide views on the current use of s73 and, if any, the impact on affordable housing obligations.

A total of 548 respondents answered Question 28.

Government response

Respondents generally highlighted the need to improve the efficiency, clarity and consistency of the process for modifying planning obligations under section 106A, while maintaining confidence that agreed affordable housing and infrastructure contributions will be delivered. Relatedly, some respondents suggested that further guidance on the interpretation and application of s106A legislation, or standard templates to support the modification process, could be developed.

Many respondents raised concern about the submission of section 73 applications to obtain planning permission with a lower level of affordable housing or other obligations. Respondents emphasised that any proposed reductions to affordable housing or other contributions should be robustly evidenced.

The government has considered these responses and acknowledges the need for a more detailed review of the statutory framework for amending planning obligations. The government will use the feedback received through this consultation to inform that review and set out further details in due course.

Question 29: Do you agree with the approach for planning conditions and obligations set out in policy DM6, especially the use of model conditions and obligations?

A total of 856 respondents answered Question 29. Of those, 29% strongly agreed, 30% partly agreed, 27% neither agreed nor disagreed, 8% partly disagreed and 7% strongly disagreed. This indicates broad support for the proposal, alongside a significant proportion of neutral responses.

Government response

Respondents supported the use of national model conditions and obligations, citing benefits for consistency, certainty, clarity and timeliness of decision-making. Respondents also emphasised the need to retain flexibility for local planning authorities to tailor conditions and obligations to local and site-specific circumstances, including the use of bespoke wording where justified. Concerns were raised about discouraging the use of pre-commencement conditions, the difficulty of commenting without draft model conditions, and the importance of engagement with the sector and clear guidance. Some respondents also suggested aligning the approach between model conditions and obligations to ensure consistency.

The government has considered these responses and is taking forward the policy largely as consulted on, noting the support for the approach set out in policy DM6. Working with the Planning Inspectorate, the government will develop a suite of national model conditions and begin publishing these before the end of the year. In developing these, the government will work closely with the sector and will provide guidance to support their use in practice.

Revisions have been made to policy DM6(4) to align with the approach for planning conditions so that, where national model planning obligations are relevant to a development, they should be used unless there are strong reasons to depart from them. The government is taking forward a programme of work with the Planning Advisory Service to support and streamline the process of section 106 agreements, with an initial focus on medium sites. The government will consult on draft standard template planning agreements for medium sites, which are designed to reduce delays and resource burdens on local planning authorities and SME housebuilders.

Question 30: Do you agree that policy DM7 clarifies the relationship between planning decisions and other regulatory regimes?

A total of 853 respondents answered this question. Of those, 28% strongly agreed, 27% partly agreed, 25% neither agreed nor disagreed, 11% partly disagreed and 9% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

Respondents supported greater co-ordination where consents from different regulatory regimes are required and considered the policy clearer than the current approach in the Framework. However, there were calls for further guidance to avoid ambiguity in how the policy should be applied in practice. Concerns were raised that reliance on other regimes operating effectively could lead to issues not being fully considered, particularly in relation to environmental permitting, air quality, pollution and licensing.

The government has considered these responses and is retaining the policy. The policy reflects established case law, allowing decision-makers to judge, on a case-by-case basis, whether such matters (dealt with by other regulatory regimes) are material to the planning decision, but that these regimes are assumed to operate effectively unless there is evidence to the contrary.

Responses for Questions 31 and 32 have been grouped.

Question 31: Do you agree with the new intentional unauthorised development policy in policy DM8?

A total of 846 respondents answered Question 31. Of those, 28% strongly agreed, 20% partly agreed, 25% neither agreed nor disagreed, 13% partly disagreed and 15% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Question 32: Are there any specific types of harm arising from intentional unauthorised development, and any specific impacts from the proposed policy, which we should consider? If so, are there any particular additions or mitigations which we should consider?

A total of 565 respondents answered Question 32.

Government response

Respondents who supported the policy considered it necessary to deter unauthorised development and maintain public confidence in the planning system. However, many raised concerns about the need for clearer definitions of intentional unauthorised development and the evidential threshold required.

Those opposed argued that the policy risks undermining the principle that planning decisions should be based on the merits of development rather than the intent of the developer. They highlighted potential additional burdens on local planning authorities in evidencing and applying the policy. Others who were opposed felt that the proposed policy would take away the decision maker's ability to exercise their judgement, for example, to take into account the reasons for carrying out the development, including in relation to traveller sites.

Responses highlighted a wide range of harms arising from intentional unauthorised development, including impacts on habitats and biodiversity, landscape character, heritage assets and increased risks such as flooding and pollution. Respondents also suggested mitigation measures, including stronger weighting in decision-making, faster enforcement action and additional resourcing for local planning authorities.

The government has considered these responses and acknowledges both the support for the policy and the concerns raised. It agrees that intentional unauthorised development can have significant impacts on communities and the environment, and that there is a clear case for strengthening the policy framework. The government is therefore retaining policy DM8 as consulted on. We have noted the comments around the need for clear definitions and guidance so we will consider this when we refresh our Planning Practice Guidance.

Question 33: Do you agree with the new Article 4 direction policy in policy DM10?

A total of 788 respondents answered Question 33. Of those, 28% strongly agreed, 22% partly agreed, 32% neither agreed nor disagreed, 10% partly disagreed and 8% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

Respondents generally supported the new policy on Article 4 directions, welcoming what they saw as a more flexible and proportionate approach. However, concerns were raised about how key elements of the policy might be interpreted in practice. Some respondents considered that a restrictive interpretation of “smallest area possible” could limit the effectiveness of Article 4 directions, particularly where impacts extend across wider areas or may be displaced. Others argued that a broad interpretation of “community cohesion” could lower the threshold for introducing directions without sufficient evidence of harm. Respondents also suggested that the policy should more clearly reflect circumstances where Article 4 directions may be appropriate, including to manage an over-concentration of small Houses in Multiple Occupation.

The government has considered these responses and acknowledges the support for a more flexible and proportionate approach. It agrees that Article 4 directions are an important tool for local planning authorities where it is necessary to protect the amenity or well-being of an area. The government is therefore taking forward the new policy in DM10, with amendments to respond to the issues raised.

The policy is amended to provide greater clarity on the circumstances in which Article 4 directions may be appropriate, including where there is an over-concentration of small Houses in Multiple Occupation. The reference to “community cohesion” is not included to avoid overly broad interpretation. The policy has also been revised to clarify that directions should apply to the smallest area required to mitigate the evidenced harm, rather than strictly limited to the smallest possible area, ensuring they remain effective while avoiding unnecessary restriction.

Chapter 4 – Achieving sustainable development

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

A total of 902 respondents answered Question 34. Of those, 28% strongly agreed, 32% partly agreed, 19% neither agreed nor disagreed, 10% partly disagreed and 10% strongly disagreed. This indicates broad support for the proposal.

Government response

Many respondents supported clear spatial strategies on the basis that they would provide greater certainty. Some suggested that a criteria-based approach to settlement boundaries would allow more flexibility and called for further guidance on issues such as boundary setting. Others proposed that policy should make explicit reference to commercial development to ensure it is not perceived as subordinate to housing.

The government has considered these responses and has concluded that the proposed approach to producing a spatial strategy should be taken forward in the final Framework. In response to concerns about the treatment of economic development, a reference to business has been added to the final policy to ensure that the needs of commercial development are given appropriate prominence.

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

A total of 813 respondents answered Question 35. Of those, 24% strongly agreed, 25% partly agreed, 27% neither agreed nor disagreed, 13% partly disagreed and 12% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

Respondents who supported the definition emphasised the benefits of clarity and consistency. However, many highlighted the need for greater certainty on specific issues, including the treatment of smaller settlements, the role of ‘gap’ policies and the relationship with the Green Belt. Concerns were also raised about compatibility with a criteria-based approach to settlement boundaries.

The government has considered these responses and proposes to take forward the definition, with minor amendments to improve clarity and policy intent. Changes have been made to clarify the relationship with development plans where settlements have yet to be defined, and to address how the definition applies to villages within the Green Belt.

Amendments have also been made to sub-paragraph (c) of the policy to clarify where ‘gap’ policies may be appropriate, and their extent. We will consider whether additional planning guidance would be helpful to assist the identification of settlements in plans.

Responses for Questions 36, 37 and 38 have been grouped.

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

A total of 1,147 respondents answered Question 36. Of those, 26% strongly agreed, 25% partly agreed, 12% neither agreed nor disagreed, 14% partly disagreed and 23% strongly disagreed. This indicates broad support for the proposal.

Question 37: Do you agree to the proposed approach to development within settlements?

A total of 1,043 respondents answered Question 37. Of those, 23% strongly agreed, 28% partly agreed, 17% neither agreed nor disagreed, 17% partly disagreed and 15% strongly disagreed. This indicates broad support for the proposal.

Question 38: Do you agree to the proposed approach to development outside settlements?

A total of 1,088 respondents answered Question 38. Of those, 14% strongly agreed, 25% partly agreed, 16% neither agreed nor disagreed, 20% partly disagreed and 26% strongly disagreed. This indicates mixed views, with support and opposition broadly balanced.

Government response

Respondents who supported the proposals highlighted the benefits of greater clarity and certainty. This included how economic growth, housing delivery and business expansion would be supported.

Those who disagreed raised concerns that the approach could weaken the plan-led system and lead to increased debate and potential litigation. Specifically, respondents suggested that the need for adverse effects to substantially outweigh harm (as a basis for disapplying the ‘tilt’ in favour of development) would reduce the control local areas would have on the development that comes forward. In relation to the approach to development within settlements under policy S4, some respondents identified the benefits of extending ‘in principle’ support beyond the brownfield approach found in paragraph 125c of the existing NPPF, including for smaller site delivery on suitable sites which may not qualify as previously-developed land. There were, however, also responses which were concerned that specific issues (such as heritage, transport, landscape and the potential loss of open space) were not given sufficient protection within the policy itself.

In relation to development outside settlement boundaries, support for the approach included the benefits of increased certainty and its support for rural development. Others expressed concern that the policy could harm the open countryside and Protected Landscapes due the amount of development which it could allow. Some respondents also suggested that the scope of the policy was too broad.

The government has considered these responses and is taking forward the overall approach in the revised Framework. Amendments have been made however to improve the operability of the policies and to address some of the specific concerns raised by respondents.

While these policies, taken together, represent a change from the way the existing presumption in favour of sustainable development works, the government considers that they will bring greater clarity and consistency to decision-making. The new presumption in favour of sustainable development is framed in simpler terms than its predecessor, and in combination with policies S4 and S5 is designed to give more direction about the suitability of development in different types of location.

These policies will not operate in isolation, and need to be read alongside other policies in the NPPF as well as those in the development plan. For example, policy HC7 on protecting recreational land and facilities, cross-referred from policy S4(2)(a)(ii), will act as an important safeguard where land is proposed for development within settlements. A reference to policy N4 on Protected Landscapes has been added to this sub-paragraph as a further safeguard where development in settlements falls within such areas. It has also been clarified that the allocation or safeguarding of buildings, as well as land, can be a reason for disapplying the positive tilt in favour of development within settlements.

Policy S4 has also been amended to replace ‘unacceptable impact’ in sub-paragraph S4(2)(a) with ‘substantial adverse impact’, to give more clarity on what is meant in this context, and to be more consistent with the more rules-based approach of the new Framework.

Question 39: Do you have any views on the specific categories of development which the policy would allow to take place outside settlements, and the associated criteria?

A total of 1,083 respondents answered Question 39. Of those, 12% strongly agreed, 21% partly agreed, 27% neither agreed nor disagreed, 20% partly disagreed and 20% strongly disagreed. This indicates mixed views, with support and opposition broadly balanced.

Government response

Respondents who were supportive welcomed the greater certainty of what development is acceptable outside settlements, including the support provided to rural development. Concerns focused on the categories and criteria being too permissive, with potential for adverse impacts in rural areas and Protected Landscapes. Respondents also raised concerns that the approach could cut across the plan-led system. A range of detailed comments were provided on how individual criteria would operate in practice and how they might be improved.

The government has considered these responses and is taking forward the proposed categories of development in the final Framework, with some adjustments. Changes have been made to address concerns about the clarity and operation of the policy, and to better manage potential impacts, including in sensitive and protected locations. Clarification has been made that processing activities associated with mineral extraction can be located outside settlements, as can telecommunications infrastructure and development which is solely for nature conservation, restoration and/or enhancement.

Additional criteria have also been added in relation to the reuse, extension and alteration of buildings to address concerns that the policy was too permissive outside of settlement boundaries (these make clear that existing buildings should be lawful in planning terms, and that replacement buildings should be for the same use as the existing buildings and not disproportionately larger than them). The wording on how this policy interacts with Green Belt policy has also been clarified in the final paragraph.

Where development to address an evidenced unmet need is proposed outside settlements, sub-paragraph (1)(j)(i) of the policy already requires that it be 'well-related' to an existing settlement, but further clarification has been added that this means 'physically' well-related. In paragraph (1)(j)(ii), reference to 'storage and distribution' has been updated to 'freight and logistics' in response to feedback, and for consistency across relevant NPPF policies.

In addition, so that the concepts of 'well-connected station' and 'reasonable walking distance' at sub-paragraph (1)(h) are dealt with as clearly and consistently as possible, new glossary definitions have been added (as these also apply to policies L3 and GB7). These new definitions are explained more fully in response to Questions 124 and 133. Separately, as set out in response to Question 182, policy N4 has been amended to make clear that major development affecting Protected Landscapes is one of the circumstances in which it may be appropriate for development to be refused.

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

A total of 834 respondents answered Question 41. Of those, 26% strongly agreed, 19% partly agreed, 24% neither agreed nor disagreed, 14% partly disagreed and 18% strongly disagreed. This indicates broad support for the proposal.

Government response

Respondents recognised the role of neighbourhood plans as a community-led part of the plan-led system and the value they offer beyond allocations, and supported strengthening their contribution to housing delivery, including through site allocations. However, many emphasised the need for a flexible and proportionate approach that reflects local constraints, capacity and context. Concerns were raised that requiring allocations could undermine the community-led nature of neighbourhood planning, place additional burdens on groups with limited resources, and risk creating a two-tier system that disadvantages less-resourced areas. Many respondents welcomed the retention of the five-year neighbourhood plan protections. Some respondents also argued that neighbourhood plans without allocations should continue to benefit from policy protections where they are up-to-date and aligned with the development plan.

The government has considered these responses and notes the overall support for strengthening the role of neighbourhood plans in delivering housing. It considers that a clearer link between neighbourhood planning and housing delivery is necessary to support the effectiveness and credibility of the plan-led system. Requiring neighbourhood plans to include site allocations to benefit from the policy framework provides a transparent and measurable way of demonstrating this contribution.

The government acknowledges concerns about capacity and the potential impacts on community-led plan-making. However, it considers that a consistent approach will provide greater clarity and certainty for plan-makers and decision-makers and support more effective plan-making overall. The government is therefore taking forward the policy approach in policy S6 without further substantive change and does not propose to introduce alternative tests of policy status or additional flexibility.

The government also recognises the need for support to ensure neighbourhood planning groups can meet these expectations. Planning Practice Guidance will be updated to provide further clarity and support, including on preparing site allocations and addressing capacity constraints.

Chapter 5 – Meeting the challenge of climate change

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

A total of 1,050 respondents answered this question. Of those, 26% strongly agreed, 38% partly agreed, 16% neither agreed nor disagreed, 13% partly disagreed and 8% strongly disagreed. This indicates broad support for the proposal.

Government response

Respondents broadly supported the emphasis on climate change as a core consideration in plan-making. However, some argued that the policy should be more explicit and enforceable, including stronger wording and clearer alignment with statutory climate targets and carbon budgets. Concerns were also raised about the scope of the policy, including whether it sufficiently addresses emissions beyond spatial strategy and allocations. Views were mixed on the balance between national consistency and local flexibility. Respondents also highlighted the potential value of carbon assessments, retrofit and circular economy principles, alongside concerns about resource implications, the need for clearer guidance and consistent methodologies. A small number suggested the policy should extend further to areas such as design and health.

The government has considered these responses and concludes that the policy provides an appropriate framework for plan-making, striking the right balance between clarity, flexibility and proportionality within the wider statutory context. It is intended, in conjunction with other plan-making policies, to provide clear national direction while enabling plans to respond proportionately to local circumstances.

The government recognises the importance of addressing climate change in a comprehensive and integrated way. The Framework should be read as a whole, with climate considerations also being reflected across other relevant policies, including design, transport, health and the natural environment.

In relation to carbon assessments, including whole-life and embodied carbon, the government does not consider it proportionate to introduce new mandatory national requirements at this stage, given the potential burdens, evidence requirements and viability impacts. However, it recognises that such assessments can support plan-making and decision-making when applied appropriately. Planning Practice Guidance will be updated to support clarity and consistency in their use.

To improve clarity, the footnote text referring to the Climate Change Act 2008 has been moved into the main body of the policy. The policy is otherwise unamended from that which was consulted on.

Responses for Questions 43, 44 and 47 have been grouped.

Question 43: Do you agree with the approach to mitigating climate change through planning decisions in policy CC2? If not, what additional measures could be taken to ensure climate change mitigation is given appropriate consideration?

A total of 1,026 respondents answered Question 43. Of those, 24% strongly agreed, 37% partly agreed, 16% neither agreed nor disagreed, 13% partly disagreed and 10% strongly disagreed. This indicates broad support for the proposal.

Question 44: Do you agree with the approach to climate change adaptation through planning decisions in policy CC3? What additional measures could be taken to ensure climate change adaptation is given appropriate consideration?

A total of 924 respondents answered Question 44. Of those, 31% strongly agreed, 34% partly agreed, 19% neither agreed nor disagreed, 9% partly disagreed and 7% strongly disagreed. This indicates strong support for the proposal.

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

A total of 719 respondents answered Question 47.

Government response

Respondents most frequently referred to the importance of nature-based solutions, biodiversity protection and green-blue infrastructure, alongside alignment with net zero targets and carbon budgeting. A notable proportion emphasised the prioritisation of brownfield development, retrofit and reuse, and the embedding of circular economy principles. Others supported strengthening the role of local authorities and communities in climate action, prioritising active travel and sustainable transport, and incorporating whole-life carbon assessments. Smaller proportions highlighted the need to integrate health and equality impacts, and to balance ambitious climate action with viability, affordability, and impacts on smaller developers and vulnerable groups.

Respondents generally supported the approach to climate change mitigation and adaptation, however some considered that national policy should go further by providing clearer, stronger and more enforceable requirements, including closer alignment with net zero targets and carbon budgets, and the use of measurable standards. Views were mixed on the balance between national consistency and local flexibility. Some respondents supported greater flexibility for local planning authorities to pursue more ambitious approaches in response to local circumstances, while others emphasised the importance of a consistent national framework, particularly where climate policy interacts with other regulatory regimes. Respondents also highlighted the importance of integrating climate considerations with wider planning objectives, including nature-based solutions, biodiversity, health, active travel and transport. A smaller number raised concerns about deliverability, including resourcing pressures and potential impacts on scheme viability.

Many respondents emphasised the role of whole-life carbon assessment, circular economy principles, retrofit and the efficient use of materials, with some advocating mandatory national requirements. Others raised concerns about the proportionality, evidence requirements and viability impacts of such approaches, and the need for clearer guidance and standardised methodologies. In relation to adaptation, some respondents called for the policy to address a broader range of risks, including overheating, and the need to give greater emphasis to improving the resilience of existing buildings and infrastructure.

The government has considered these responses carefully and concludes that policies CC2 and CC3 as consulted upon provide a clear and proportionate framework for decision-making, striking an appropriate balance between national direction and flexibility. The specific elements of each policy will apply “where relevant” to ensure they operate proportionately in different circumstances.

As set out above, in response to comments on policy CC1, the Framework policies need to be read as a whole so that climate change is addressed comprehensively, while, for the reasons also set out there, the government is not requiring whole-life carbon assessments through planning at the present time (which this does not preclude assessments being used for specific schemes where appropriate).

To support the transition to zero-emission vehicles a new reference to supporting infrastructure has been added to policy CC2(1)(a). Minor changes have also been made to policy CC2 to improve clarity; this includes a change to CC2(1)(a) to focus on accordance with policies TR3 and TR4 with reference to prioritising sustainable patterns of movement, and at policy CC2(1)(g) by replacing ‘increase’ with ‘involve’ as development may place indirect demands on fossil fuel extraction.

The government has made additions to policy CC3 to strengthen support for improving the resilience of existing buildings and public spaces by requiring decision-makers to give substantial weight to these benefits. Changes have also been made to policy CC3 in relation to wildfires, to improve clarity and support proportionate application, as explained more fully below.

Responses for Questions 45 and 46 have been grouped.

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

A total of 715 respondents answered Question 45. Of those, 15% strongly agreed, 27% partly agreed, 38% neither agreed nor disagreed, 13% partly disagreed and 8% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

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

A total of 427 respondents answered Question 46.

Government response

Many respondents expressed support in principle for the inclusion of wildfire risk in national planning policy. Many also emphasised the importance of embedding wildfire adaptation within wider design and placemaking from the earliest stages, alongside environmental considerations such as vegetation management and biodiversity protection. Others supported a proportionate, risk-based approach tailored to local circumstances, while some highlighted the need for consultation with relevant stakeholders and clarity on long-term maintenance responsibilities.

The government has considered these responses and has amended the policy to improve clarity, strengthen proportionate application and support consistent use in practice. The revised policy replaces the reference to “heightened risk” with a clearer approach to identifying wildfire risk, including examples of where wildfires may pose a particular risk. It also establishes a clear expectation that proportionate adaptation measures should be incorporated where a particular risk is identified and provides greater clarity on the types of measures that may be appropriate.

The government recognises the importance of ensuring that wildfire adaptation supports high-quality design and placemaking. Changes have been made to clarify that adaptation measures should be designed into the layout and landscaping of development. The Framework should be read as a whole, with climate change adaptation considered alongside wider objectives, including environmental quality, design and green infrastructure.

Overall, the government considers that these amendments provide a clearer, more consistent and proportionate framework for addressing wildfire risk, allowing for the use of local evidence and site-specific considerations, and reflecting the potential for further evidence and mapping to become available over time. Considering the consultation responses, the government has amended the policy but retained the overall direction and intent of the original proposal. The policy will be supported by updated Planning Practice Guidance.

Chapter 6 – Delivering a sufficient supply of homes

Question 48: Do you agree the requirements for spatial development strategies and local plans in policy HO1 and policy HO2 are appropriate?

A total of 897 respondents answered Question 48. Of those, 15% strongly agreed, 33% partly agreed, 19% neither agreed nor disagreed, 16% partly disagreed and 17% strongly disagreed. This indicates broad support for the proposal.

Government response

There was broad support for ensuring a clearer and more consistent framework for assessing housing need and setting requirements across plan-making. However, some respondents sought greater clarity on how the policy should be implemented, particularly in addressing unmet housing need, the relationship between SDSs and local plans, and the role of neighbourhood plans. Many called for clearer guidance to clarify these points, stronger collaboration between local planning authorities and neighbourhood planning groups, and greater recognition of local evidence, community priorities and deliverability considerations.

Other respondents called for greater emphasis on affordable and specialist housing, the prioritisation of brownfield development and making more effective use of existing stock.

The government has carefully considered these responses and decided to proceed with the proposals set out in policies HO1 and HO2 as consulted on. These changes will provide greater clarity and consistency in planning for housing and traveller sites, at the appropriate level, and support effective collaboration in plan-making. In response to consultation feedback, the government will also update Planning Practice Guidance to provide greater clarity on neighbourhood plan preparation, including site allocations and the consideration of local housing need. This will set clear expectations for collaborative working between local planning authorities and neighbourhood planning groups, and the use of local evidence to inform housing requirements and delivery.

Responses for Questions 49, 57, 58 and 62 have been grouped.

Question 49: Is further guidance required on assessing the needs of different groups, including older people, disabled people, and those who require social and affordable housing? If so, what elements should this guidance cover?

A total of 783 respondents answered Question 49. Of those, 44% strongly agreed, 23% partly agreed, 27% neither agreed nor disagreed, 3% partly disagreed and 3% strongly disagreed. This indicates strong support for the proposal, with a significant proportion of neutral responses.

Question 57: Do you agree with our proposals to ask authorities to set out the proportion of new housing that should be delivered to M4(2) and M4(3) standards?

A total of 767 respondents answered Question 57. Of those, 31% strongly agreed, 24% partly agreed, 28% neither agreed nor disagreed, 7% partly disagreed and 9% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Question 58: Do you agree 40% of new housing delivered to M4(2) standards over the plan period is the right minimum proportion? Please provide your reasons, and would you support an alternative minimum percentage requirement?

A total of 745 respondents answered Question 58. Of those, 12% strongly agreed, 21% partly agreed, 33% neither agreed nor disagreed, 15% partly disagreed and 20% strongly disagreed. This indicates mixed views, with a significant proportion of neutral responses.

Question 62: Are any changes to policy HO7 needed in order to ensure that substantial weight is given to meeting relevant needs?

A total of 788 respondents answered Question 62.

Government response

There was broad support for strengthening expectations around meeting the needs of different groups and giving substantial weight to evidenced local housing needs. Some respondents sought greater clarity on what we mean by terms such as ‘local community’ and on the evidence of need required. Most respondents supported additional guidance being provided to assist local authorities in assessing the needs of different groups, to increase consistency and ensure needs are not underestimated. The government has decided to retain policy HO7, but with drafting changes to improve its clarity in response to consultation feedback. These make clear that substantial weight should be given to the benefits of providing additional homes, including accommodation to meet the needs of particular groups. This can be identified through needs assessments prepared for the area of the local planning authority, but other relevant evidence should also be taken into account.

In relation to accessible housing, most responses supported proposals for authorities to set out the proportion of new housing that should be delivered to M4(2) and M4(3) standards. There were more mixed views on the proposed 40% minimum floor for M4(2), with some advocating for a higher figure on the basis that the 40% could become a default ceiling, while others argued for a lower figure due to viability concerns. Some calls were also made for a national baseline to be set for M4(3), although many developers raised concerns about the significant costs and challenges in building homes to this standard, particularly on sites with topographical issues. There were also concerns in relation to setting a proportion of accessible housing over the plan period. Some respondents argued this would lead to a greater burden on local authorities to assess delivery, would undermine efforts to provide certainty to the sector and could lead to inconsistent outcomes. Some respondents also noted it could lead to local authorities end-loading the obligation to the end of the plan period.

The government welcomes the broad support for strengthening the approach to accessible housing provision. In response to the feedback, the policy has been amended from a requirement for new housing delivered over the plan period, to a requirement for local plans to set out the proportion of new homes to be delivered to M4(2) and M4(3) standards on major development, to meet or exceed identified local need. Given that, in the year ending September 2025, over 90% of housing units granted permission were on major development sites, this approach will apply to the majority of new housing.

The government has also decided to maintain a national minimum floor of 40% of M4(2) housing (with higher requirements set depending on local need). We consider this strikes the appropriate balance between providing a backstop and boosting provision in areas without clear requirements, while ensuring local authorities have sufficient flexibility to maximise housebuilding overall. This approach acknowledges that local authorities are best placed to assess accessible housing needs in their areas and set out appropriate exemptions based on local circumstances. We are clear that this is a minimum floor, and not a target; many local plans already set higher targets, or 100% targets as is the case in Liverpool, Worthing and the London Plan. Our policy will require authorities to continue setting higher targets where necessary to meet or exceed need.

To support this locally led approach, the government will publish updated guidance in due course to assist local authorities in assessing the housing needs of different groups, including older people and disabled people.

Responses for Questions 4, 50, 51, 54 and 78 have been grouped.

Question 4: Do you agree with incorporating Planning Policy for Traveller Sites within the draft Framework?

A total of 966 respondents answered Question 4. Of those, 32% strongly agreed, 21% partly agreed, 33% neither agreed nor disagreed, 5% partly disagreed and 9% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Question 50: Do you agree with the approach to incorporating relevant policies of Planning Policy for Traveller Sites within this chapter?

A total of 683 respondents answered Question 50. Of those, 33% strongly agreed, 17% partly agreed, 38% neither agreed nor disagreed, 5% partly disagreed and 8% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Question 51: Is further guidance needed on how authorities should assess the need for traveller sites and set requirement figures? If so, what are the key principles this guidance should establish?

A total of 631 respondents answered Question 51. Of those, 32% strongly agreed, 13% partly agreed, 49% neither agreed nor disagreed, 3% partly disagreed and 5% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Question 54: Do you agree the requirements to establish a five-year supply of deliverable traveller sites and monitor delivery are sufficiently clear? Please provide your reasons, particularly if you disagree.

A total of 627 respondents answered Question 54. Of those, 16% strongly agreed, 17% partly agreed, 43% neither agreed nor disagreed, 10% partly disagreed and 15% strongly disagreed. This indicates mixed views, with a significant proportion of neutral responses.

Question 78: Do you agree the proposals to set out requirements for traveller sites at policy HO12 adequately capture relevant aspects from Planning Policy for Traveller Sites, whilst ensuring fair treatment for traveller sites in the planning system?

A total of 613 respondents answered Question 78. Of those, 12% strongly agreed, 23% partly agreed, 44% neither agreed nor disagreed, 11% partly disagreed and 10% strongly disagreed. This indicates mixed views, with a significant proportion of neutral responses.

Government response

There was broad support for incorporating Planning Policy for Traveller Sites into the Framework, to ensure a clearer and more consistent application of policies across plan-making and decision-making.

However, some respondents highlighted the need for further guidance, particularly on assessing the need for traveller sites and setting pitch and plot requirement figures. Concerns were also raised about the clarity and deliverability of requirements to maintain a five-year supply of traveller sites. Some respondents identified areas where the wording of policy HO12 could be clearer, including references to long-distance travel, and raised issues relating to identifying suitable sites and how policies would operate consistently across different areas. In related concerns, some respondents suggested the criteria in policy S5(1)(j)(i), requiring development be well related to existing settlements, would make it more difficult for traveller sites to gain permission than under current policy.

The government has carefully considered these responses and has decided to incorporate traveller policies into the Framework, while also agreeing that further guidance would help the assessment of specific accommodation needs for traveller sites and support the application of plan and decision-making policies. The government will therefore publish new Planning Practice Guidance on traveller sites in due course.

The government has also made targeted amendments to policy HO12 to address the responses. References to design have been removed and will instead be addressed in Planning Practice Guidance on traveller sites. References to health and wellbeing impacts have also been removed to ensure that traveller site proposals are considered consistently with other forms of development under the wider Framework, including in relation to policies on flood risk and environmental quality. We have also clarified wording regarding the provision of alternative sites, to make explicit that the views of existing residents should be taken into account when identifying suitable alternative sites. A change has been made to address concerns that traveller sites may find it more difficult to gain permission under policy S5. This specifies that it may be appropriate for traveller sites to be in locations not well related to existing settlements.

Overall, the government considers that the incorporation of Planning Policy for Traveller Sites within the Framework, alongside these targeted amendments and new guidance, provides a clearer and more consistent approach, and so intends to retain the policy subject to the refinements set out above.

Responses for Questions 52 and 53 have been grouped.

Question 52: Do you agree the new Annex D to the draft Framework is sufficiently clear on how local planning authorities should set the appropriate buffer for their local plan 5-year housing land supply?

A total of 727 respondents answered Question 52. Of those, 23% strongly agreed, 18% partly agreed, 32% neither agreed nor disagreed, 10% partly disagreed, and 17% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Question 53: Do you agree the new Annex D to the draft Framework is sufficiently clear on the wider procedural elements of 5-year housing land supply, the Housing Delivery Test and how they relate to decision-making?

A total of 707 respondents answered Question 53. Of those, 21% strongly agreed, 19% partly agreed, 35% neither agreed nor disagreed, 9% partly disagreed, and 16% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

There was broad support for Annex D, particularly in providing a clearer explanation of how 5-year housing land supply and the Housing Delivery Test inform decision-making, as well as for consolidating guidance and improving transparency. However, some respondents raised concerns regarding the clarity of the drafting, including calling for further guidance or examples to support consistent interpretation and application. Some responses also raised broader concerns about the operation of 5-year housing land supply and the Housing Delivery Test more generally, including that they lead to unplanned development and hold local authorities to account against measures which are not in their control.

On balance, the government considers that Annex D provides a clearer and more coherent framework for understanding how 5-year housing land supply, the Housing Delivery Test and related decision-making policies interact, and that consolidating this material in one place improves usability. The government is therefore retaining Annex D as consulted on. While some responses raised broader concerns about 5-year housing land supply and Housing Delivery Test polices, there was no clear consensus on what changes to these policies should involve. The government remains satisfied that these measures are important tools in ensuring homes are delivered in line with the needs of communities.

Responses for Questions 55 and 82 have been grouped.

Question 55: Do you agree the plan-making requirements, for both local plans and spatial development strategies, in relation to large scale residential and mixed-use development are sufficiently clear?

A total of 779 respondents answered Question 55. Of those, 15% strongly agreed, 31% partly agreed, 25% neither agreed nor disagreed, 16% partly disagreed and 13% strongly disagreed. This indicates mixed views, with a significant proportion of neutral responses.

Question 82: Are any more specific approaches or definitions needed to support the delivery of very large (super strategic) sites, including new towns?

A total of 434 respondents answered Question 82. Of those, 68% said yes and 32% said no. This indicates strong support for the proposal.

Government response

Respondents broadly supported the principle of planning for large scale residential and mixed-use development, but concerns were raised about how policy should operate in practice. Some respondents called for a clearer definition of large-scale development, greater consistency across the Framework, and more certainty about the relationship between local plans and SPDs. Others raised concerns as to whether local planning authorities should be expected to identify such sites in all circumstances, including where suitable opportunities may not exist.

The government has carefully considered these responses and has made changes to introduce greater clarity. A definition of 'strategic site' has been introduced into the glossary of the Framework. This defines a strategic site as a multi-phase residential, commercial or mixed-use development requiring masterplanning and significant infrastructure, with an indicative minimum threshold of 1,500 dwellings to illustrate the scale envisaged. This definition has been applied consistently across relevant policies to support a clearer and more coherent approach across the NPPF.

Policy HO4 has been amended to clarify that it applies to this category of strategic sites and that local planning authorities should identify suitable sites where these exist, but are not required to allocate sites where no suitable opportunities are available. The policy also makes clear that local plans can identify strategic sites.

We have also reinserted references to Garden City principles, as an example of placemaking principles which may be relevant to strategic sites. To avoid confusion regarding their application, we have removed the reference to New Town principles. Requirements for New Towns are being considered following the consultation held earlier this year on the draft New Towns Programme.

As set out below, complementary changes have also been made to policy HO13 so that it better supports strategic site development.

Responses for Questions 56, 75, 76 and 77 have been grouped.

Question 56: Do you agree our proposed changes to the definition of designated rural areas will better support rural social and affordable housing?

A total of 934 respondents answered Question 56. Of those, 40% strongly agreed, 17% partly agreed, 25% neither agreed nor disagreed, 7% partly disagreed and 12% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Question 75: Do you agree the proposals provide adequate additional support for rural exception sites? a) Please provide your reasons, including what other changes may be needed to increase their uptake?

A total of 662 respondents answered Question 75. Of those, 14% strongly agreed, 28% partly agreed, 36% neither agreed nor disagreed, 11% partly disagreed and 11% strongly disagreed. This indicates broad support, with a significant proportion of neutral responses.

Question 76: Do you agree with proposals to remove First Homes exception sites as a discrete form of exception site?

A total of 625 respondents answered Question 76. Of those, 39% strongly agreed, 10% partly agreed, 43% neither agreed nor disagreed, 4% partly disagreed and 5% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Question 77: Do you agree proposals for a benchmark land value for rural exception sites will help to bring forward more rural affordable homes? If so, which approach and value as set out in the narrative for policy HO10 of the consultation document is the most beneficial for government to set out?

A total of 614 respondents answered Question 77. Of those, 13% strongly agreed, 20% partly agreed, 48% neither agreed nor disagreed, 7% partly disagreed and 12% strongly disagreed. This indicates mixed views, with a significant proportion of neutral responses.

Government response

There was broad support for the proposed changes to the definition of designated rural areas. Some respondents considered that allowing affordable housing requirements on smaller sites was an important step in addressing affordable housing shortages in rural areas. Others called for further strengthening of policy, including broadening the definition of designated rural areas and being more directive on the type or amount of affordable housing that should be delivered. In contrast, some respondents raised concerns about potential impacts on viability, particularly for SME developers. Responses also sought further clarity on the areas in scope of our amended definition.

There was also broad support for proposals relating to rural exception sites, particularly the approach to strengthening support for this type of development and the removal of First Homes exception sites. There were mixed views on benchmark land values. Although there was some support for introducing a benchmark land value, there was no clear consensus on an appropriate threshold, and many respondents emphasised that any approach should reflect local circumstances rather than be set nationally. Respondents also highlighted the need for greater clarity on how policy should operate in practice, particularly in relation to permission in principle.

Many respondents sought clearer guidance on the role of community-led exception sites, including the size of sites that should be permitted. Concerns were raised that current policy does not clearly address how community-led schemes that incorporate supporting land uses should be treated. Some respondents also suggested that traveller sites are better considered as part of policy HO12, with their inclusion in policy HO10 making the operation of the policy less clear.

The government has carefully considered these responses and has made targeted amendments to support policy clarity and effective implementation. The definition of designated rural areas has been revised to make clearer which areas are in scope. In response to concerns, the policy has also been amended to clarify how size requirements for rural exception sites should be applied, confirming that these should be based on the built area of the site and on whichever is the greater of the relevant criteria. We have also removed explicit reference to traveller sites from policy HO10, in response to views that these are better considered as part of policy HO12.

The government recognises the need for greater clarity on how rural exception site policy applies in relation to permission in principle and will consider whether further guidance is needed to address this. We will also consider the feedback on benchmark land values, including the need to reflect local circumstances, alongside any future guidance.

Responses for Questions 59 and 60 have been grouped.

Question 59: Do you agree the proposals to support the needs of different groups, through requiring authorities to identify sites or set requirements for parts of allocated sites, are proportionate?

A total of 736 respondents answered Question 59. Of those, 20% strongly agreed, 33% partly agreed, 32% neither agreed nor disagreed, 9% partly disagreed and 7% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Question 60: Do you agree with our proposals to ask authorities to set out requirements for a broader mix of tenures to be provided on sites of 150 homes or more? a) Please provide your reasons and indicate if an alternative site size threshold would be preferable.

A total of 1,006 respondents answered Question 60. Of those, 17% strongly agreed, 45% partly agreed, 18% neither agreed nor disagreed, 10% partly disagreed and 9% strongly disagreed. This indicates broad support for the proposal.

Government response

There was broad support for the principle of requiring authorities to identify sites, or set requirements for parts of allocated sites, to meet the needs of different groups. Many respondents considered this an important step in addressing the provision of specialist housing and supporting under-represented groups. However, some respondents considered the policy should go further, for example by requiring needs to be met in full or by more directly supporting community-led and small-scale providers. Many respondents also supported requirements for a wider mix of tenure to be secured on sites of 150 or more.

However, views were more mixed on the detail of these policies. Some respondents cautioned against a prescriptive approach to setting a site size threshold and tenure mix, arguing these should be informed by local evidence and site characteristics. Others considered the policy was not sufficiently prescriptive and called for clearer requirements, including defined proportions of affordable, specialist or community-led housing. There were also differing views on the proposed 150-home threshold for mixed tenure policies. Some responses suggested the threshold was too high to have an effect in rural or coastal areas where site sizes are smaller, whilst others considered it was too low to deliver a mix of tenures on many sites and could hinder development from coming forward in some areas, particularly in combination with other policy requirements. A significant number of responses also raised concerns about potential delivery and viability implications, emphasising the need to retain flexibility to reflect site-specific circumstances and market conditions.

The government has carefully considered the responses received, and, on balance, has decided to remove the reference to the specific threshold of 150 homes for mixed tenure requirements. The introduction of a definition of ‘strategic sites’, with an indicative threshold of 1,500 units, already sets clear expectations for mixed tenure development at this scale. Below this threshold, we want to ensure a mix of tenures can come forward on sites across a range of sizes, where appropriate and deliverable. Setting a fixed threshold could limit local flexibility in responding to different site considerations, and hinder development.

To better support our ambitions, we have made changes to policy HO5(1)(d) to clarify and strengthen expectations that, when allocating sites, authorities should consider setting appropriate and deliverable tenure mix requirements, in line with the needs of their areas. This can also include identifying sites for specific forms of accommodation where this is suitable. This approach continues to set clear expectations for mixed-tenure development, while enabling greater flexibility and ensuring requirements better respond to local needs and market conditions.

Question 61: Do you agree with proposals for authorities to allocate land to accommodate 10% of the housing requirement on sites of between 1 and 2.5 hectares?

A total of 811 respondents answered Question 61. Of those, 19% strongly agreed, 24% partly agreed, 25% neither agreed nor disagreed, 14% partly disagreed and 18% strongly disagreed. This indicates mixed views, with a significant proportion of neutral responses.

Government response

There was broad support for the principle of increasing the supply of small and medium-sized sites, supporting SME builders, diversifying housing supply and accelerating delivery. However, some respondents raised concerns about deliverability, including the availability of suitable sites, the capacity of local planning authorities to identify and allocate them, and the application of a fixed percentage requirement across different local contexts. Many respondents emphasised the need for greater flexibility to reflect local constraints, with local authorities in particular highlighting the practical challenges in identifying sites, particularly in constrained areas.

The government has carefully considered these responses and, on balance, has decided to retain the requirement in policy HO6 for local plans to allocate land to accommodate 10% of the housing requirement on sites of between 1 and 2.5 hectares. This proposal will help to boost the supply of medium-sized sites, provide greater certainty to SME developers at different stages of the planning process and encourage development across a range of site sizes. This will support the government's wider ambitions to diversify the housing market and accelerate build-out, as we know sites of these sizes tend to be delivered by SME housebuilders and built out more quickly.

The government recognises concerns relating to local flexibility and deliverability. As with existing requirements for accommodating at least 10% of the housing requirement on sites no larger than one hectare, the policy makes clear that authorities should meet this expectation unless there are strong reasons why these targets cannot be achieved. The government also considers that wider efforts to improve digital planning could provide opportunities to support a more streamlined and proportionate process, alongside interventions such as the Small Sites Aggregator which will bring forward more small sites for development. Taken together, the government considers this approach supports wider government objectives in a way that is ambitious, yet deliverable.

Responses for Questions 63, 64 and 66 have been grouped.

Question 63: Do you agree that proposals to add military affordable housing to the definition of affordable housing, and allow military housing to be delivered as part of affordable housing requirements, will successfully enable the provision of military homes?

A total of 651 respondents answered Question 63. Of those, 17% strongly agreed, 22% partly agreed, 44% neither agreed nor disagreed, 10% partly disagreed and 8% strongly disagreed. This indicates mixed views, with a significant proportion of neutral responses.

Question 64: Do you agree flexibility relating to the size of market homes provided will better enable developments providing affordable housing?

A total of 761 respondents answered Question 64. Of those, 17% strongly agreed, 23% partly agreed, 28% neither agreed nor disagreed, 11% partly disagreed and 21% strongly disagreed. This indicates mixed views, with a significant proportion of neutral responses.

Question 66: Are changes to planning policy needed to ensure that affordable temporary accommodation, such as stepping stone housing, is appropriately supported, including flexibilities around space standards?

A total of 481 respondents answered Question 66.

Government response

There was broad support for the inclusion of military affordable housing within the definition of affordable housing, on the basis it could remove uncertainty and support delivery on specific sites. However, support was often conditional on clear evidence of need, ensuring provision is directed to appropriate locations and does not displace other affordable housing tenures. Respondents who supported proposals to enable flexibility in the size of market homes considered that it could improve the viability of schemes and support overall housing delivery, particularly on smaller sites. However, some respondents sought clarity that this would not lead to homes being built below adopted space standards and should not lead to an imbalance in overall housing mix. Similar concerns were raised regarding space standards for stepping stone housing, where respondents indicated the need to prevent overcrowding. However, some respondents noted that clarity on how authorities can support this type of housing, including by disapplying space standards where appropriate, could facilitate the delivery of stepping stone housing to help prevent homelessness.

Having carefully considered the consultation responses, the government has retained the proposed changes to include military affordable housing within the affordable housing definition. In response to consultation feedback, the government will publish further guidance on how the policy on military affordable housing should be applied, including how need should be evidenced and how provision should be delivered in appropriate locations.

The government acknowledges the need to ensure flexibility in the size of market homes does not undermine delivery of appropriate housing quality. We have therefore made changes to clarify that flexibility relates to the number of bedrooms in market homes, taking account of local market conditions and evidenced need.

The government will also consider whether guidance, including through Planning Practice Guidance on space standards, could provide additional clarity on the treatment of stepping stone housing.

Question 65: Would requiring a minimum proportion of social rent, unless otherwise specified in development plans, support the delivery of a greater number of social rent homes? a) If so, what would be an appropriate minimum proportion and development size threshold taking into account development viability?

A total of 814 respondents answered Question 65. Of those, 27% strongly agreed, 28% partly agreed, 24% neither agreed nor disagreed, 9% partly disagreed and 12% strongly disagreed. This indicates broad support for the proposal.

Government response

Respondents generally agreed that introducing a minimum proportion of social rent could provide a clear signal of the importance of this tenure and support delivery. Support was often conditional on the minimum proportion operating as a floor rather than a ceiling, allowing local authorities to set higher targets in line with local needs. Respondents also emphasised the need for clear definitions and accompanying guidance to support policy implementation, including in relation to viability.

However, many respondents argued that a national requirement could reduce local flexibility, fail to reflect site-specific viability constraints and risk slowing overall delivery of both affordable and market housing. Responses emphasised that targets should be set locally, based on evidence of need.

The government is committed to prioritising the building of new social rent homes. However, having carefully considered the concerns raised through the consultation, we have decided not to set a fixed minimum proportion of social rent at this time. The government will continue to require authorities to identify the proportion of social rent needed in their areas and set out requirements clearly in local plans. This approach maintains the role of local plans in setting overall affordable housing requirements and determining where contributions are sought, while providing a clear expectation that social rent should form part of the tenure mix. The government considers this strikes a more proportionate balance between strengthening delivery of social rent and allowing flexibility to reflect local viability considerations and housing need. We will continue to monitor the impact of these requirements, introduced in December 2024, over a longer timeframe, and will keep the approach under review.

Responses for Questions 67 and 68 have been grouped.

Question 67: Do you agree that applicants should have discretion to deliver social and affordable housing requirements via cash payments in lieu of on-site delivery on medium sites? a) If so, would it be desirable to limit the circumstances in which cash contributions in lieu of on-site delivery can be provided – for example, should it not be permitted on land released from the Green Belt where the Golden Rules apply? Please explain your answer. b) If you do not believe applicants should have blanket discretion to discharge social and affordable housing requirements through commuted sums, do you think cash contributions in lieu of on-site delivery should be permitted in certain circumstances – for example where it could be evidenced that onsite delivery would prevent a scheme from being delivered? Please explain your answer.

A total of 910 respondents answered Question 67. Of those, 18% strongly agreed, 12% partly agreed, 18% neither agreed nor disagreed, 11% partly disagreed and 41% strongly disagreed. This indicates broad opposition to this proposal.

Question 68: What risks and benefits would you expect this policy to have? Please explain your answer. The government is particularly interested in views on the potential impact on SME housing delivery, overall housing delivery, land values, build out rates, overall social and affordable housing delivery, and Registered Providers (including SME providers).

A total of 579 respondents answered Question 68.

Government response

Respondents generally agreed that many SME housebuilders continue to face challenges in finding buyers for onsite affordable housing.

Where respondents supported the proposals, they suggested that allowing financial contribution in lieu of onsite delivery could help unlock sites, address viability challenges and support SME delivery, particularly if this avoided additional tests that would introduce delay, cost and complexity. However, there was significant opposition across stakeholder groups. Concerns focused on the risk that commuted sums could become a routine alternative to on-site provision, reducing mixed communities, particularly in rural areas. Respondents also highlighted that commuted sums are often undervalued or eroded over time and could displace affordable housing away from areas where it is most needed.

The government has considered these responses and has decided not to proceed with proposals to allow applicants discretion to deliver social and affordable housing requirements via cash payments in lieu of on-site delivery on medium sites. This reflects concerns that, at this time, it could have a detrimental impact on the manifesto commitment to deliver the biggest increase in social and affordable housebuilding in a generation and to strengthen planning obligations to ensure new developments provide more affordable homes.

However, the government recognises that challenges remain, particularly for SME developers where there is limited registered provider appetite to acquire small numbers of Section 106 affordable homes. To help address this, the government will publish guidance to improve clarity, consistency and confidence in the use of commuted sums (see response to Question 69 and 70).

Responses for Questions 69 and 70 have been grouped.

Question 69: What guidance or wider changes would be needed to enable Local Planning Authorities to spend commuted sums more effectively and more quickly?

A total of 447 respondents answered Question 69.

Question 70: Would further guidance be helpful in supporting authorities to calculate the appropriate value of cash contributions in lieu? If so, what elements and principles should this guidance set out? Please explain your answer. For example, guidance could make clear that contributions in lieu should be an amount which is the equivalent value of providing affordable housing on-site, based on a comparison of the Gross Development Value of the proposed scheme with the Gross Development Value of the scheme assuming affordable housing was provided onsite.

A total of 451 respondents answered Question 70. Of those, 81% agreed and 19% disagreed. This indicates strong support for the proposal.

Government response

Responses to Question 69 indicated broad support for greater flexibility in how commuted sums are used, alongside calls for stronger national guidance on how they are spent in practice. Respondents highlighted practical barriers, including land availability constraints and capacity pressures within local authorities.

In relation to Question 70, most respondents supported further guidance to improve the consistency and clarity of calculating commuted sums. Many emphasised that contributions should be equivalent to on-site provision, alongside calls for clearer methodologies while retaining flexibility to reflect local circumstances. A smaller group raised concerns about oversight, accountability and whether commuted sums can deliver outcomes comparable to on-site provision.

The government has considered these responses and agrees there is a strong case for clearer and more consistent guidance. We will therefore develop guidance on both the use and calculation of commuted sums for affordable housing, to support a fair and transparent system of developer contributions while maintaining flexibility for local circumstances.

This will include consideration of how guidance can support effective deployment of contributions in practice, alongside work on standardised planning agreements, including whether standardised clauses could support the use of cash-in-lieu payments.

Question 71: Do you support proposals to enable off-site delivery where affordable housing delivery can be optimised to produce better outcomes in terms of quality or quantity?

A total of 739 respondents answered Question 71. Of those, 24% strongly agreed, 30% partly agreed, 23% neither agreed nor disagreed, 8% partly disagreed and 14% strongly disagreed. This indicates broad support for the proposal.

Government response

Respondents supporting the proposal considered that off-site delivery can produce better outcomes in certain circumstances, particularly where on-site provision is impractical or sites are unsuitable for particular affordable tenures due to viability constraints or lack of registered provider demand. In these cases, respondents noted that off-site provision could deliver a higher quantum or better quality of affordable housing on alternative sites.

However, many respondents emphasised that on-site delivery should remain the default to support mixed and balanced communities. Concerns were raised that greater flexibility could be used to avoid obligations, reduce provision or weaken transparency. Respondents also highlighted potential losses in integration and accessibility, as well as practical challenges such as land assembly and securing delivery partners. There was strong support for local planning authorities retaining discretion over when off-site delivery is appropriate. Some respondents also raised concerns that off-site delivery could displace affordable housing away from rural, coastal or other designated areas, and suggested it should only be permitted where there is clear evidence of better outcomes and timely, local delivery.

The government has considered these responses and acknowledges the support for using off-site delivery selectively where it can deliver better outcomes, alongside strong concerns about its wider impacts. The government will retain the expectation that offsite delivery on an alternative nearby site would optimise the quality or quantity of homes built – and has clarified at policy HO8(1)(a) that this expectation applies to the affordable homes provided. Local authorities will continue to have discretion over where such an approach is appropriate.

A very small number of respondents also noted the removal of references to the Vacant Building Credit from the Framework. These responses were evenly split between those who welcomed the removal, those who objected to the removal, and those that sought clarity on whether this removal was intentional. Some responses argued removal could support the delivery of affordable housing, however others noted the value of this policy in supporting the development of brownfield sites. This policy was removed in error, and taking into consideration the comments received we have reinstated it through wording in policy HO8.

Responses for Questions 72, 73 and 74 have been grouped.

Question 72: Do you agree the with the criteria set out regarding the locations of specialist housing for older people?

A total of 772 respondents answered Question 72. Of those, 31% strongly agreed, 28% partly agreed, 28% neither agreed nor disagreed, 7% partly disagreed and 6% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Question 73: Do you agree with the criteria set out regarding the locations of community-based specialist accommodation, including changes to the glossary?

A total of 602 respondents answered Question 73. Of those, 22% strongly agreed, 25% partly agreed, 41% neither agreed nor disagreed, 8% partly disagreed and 4% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Question 74: Do you agree with the criteria set out regarding the locations of purpose-built student accommodation and large-scale shared living accommodation, including changes to the glossary?

A total of 614 respondents answered Question 74. Of those, 21% strongly agreed, 26% partly agreed, 43% neither agreed nor disagreed, 7% partly disagreed and 3% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

There was broad support for proposed requirements relating to specialist housing for older people, particularly in ensuring this housing comes forward in the right locations and is appropriately accessible. Some respondents raised concerns that the criteria relating to access to services could constrain delivery in rural areas. Feedback was also mixed on the application of M4(2) standards to specialist older persons' housing, with some suggesting these should be applied based on levels of need. There were some calls for specialist housing for disabled people to also be included in this policy, as well as calls for greater clarity on terms such as 'frequently used' services.

There was also broad support for the criteria set out for specialist community-based accommodation, noting that locational criteria are important to ensure integration within communities. Some respondents made clear that any criteria should be applied flexibly, while others stressed the importance of meeting relevant safety standards, ensuring appropriate management arrangements are in place and offering support to residents. A number of responses requested further guidance on what would constitute specialist community-based accommodation. There was also broad support for the criteria relating to purpose-built student accommodation and large-scale shared living, although some respondents raised concerns about overconcentration of this type of provision and the impacts on local communities. Several responses requested further guidance on community-based specialist accommodation, student accommodation and large-scale living accommodation, to cover aspects such as accessibility, communal amenities and design.

The government has considered these responses and made changes to clarify that, for specialist housing for older or disabled people, appropriate locations can include the provision of on-site transport to services to address concerns about rural delivery. The government considers it appropriate for such housing to be built to at least M4(2) of the Building Regulations, to ensure homes are accessible and can be adapted based on the needs of residents. This does not preclude some specialist housing for older and disabled people being built to the M4(3) standard where necessary to meet need. In response to consultation feedback, the policy has also been expanded to include specialist housing for disabled people, ensuring this accommodation is also brought forward in suitable locations with access to services.

For specialist community-based accommodation, the government has expanded the glossary definition to clarify that this includes, but is not limited to, supported accommodation for looked after children and care leavers. While some respondents called for more prescriptive criteria, the government considers that the existing approach allows appropriate flexibility to reflect the range of accommodation types that can come under this definition.

The government has decided to maintain the proposed criteria for purpose-built student accommodation and large-scale shared living accommodation, noting most responses were supportive or neutral.

The government has made minor changes to the definitions of Build to Rent and large-scale shared living accommodation to reflect changes to tenancies in the Renters' Rights Act 2025.

Responses for Questions 80 and 81 have been grouped.

Question 80: Do you agree the proposals in policy HO13 will help to ensure development proposals are built out in a reasonable period?

A total of 741 respondents answered Question 80. Of those, 13% strongly agreed, 25% partly agreed, 29% neither agreed nor disagreed, 15% partly disagreed and 19% strongly disagreed. This indicates mixed views, with support and opposition broadly balanced.

Question 81: Do you agree the requirements to take a flexible approach to the consenting framework for large scale residential and mixed-use development is sufficient to ensure the opportunities of large-scale development are supported?

A total of 645 respondents answered Question 81. Of those, 14% strongly agreed, 30% partly agreed, 37% neither agreed nor disagreed, 10% partly disagreed and 9% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

There was general support for the overall aim of increasing build out rates and ensuring that land with permission is developed without unnecessary delay. However, a number of respondents questioned whether the proposed policy would have a practical impact on delivery, noting that commencement does not necessarily lead to timely build out.

Respondents were also generally supportive of the principle that consenting frameworks should allow flexibility for large, multi-phase schemes delivered over long periods, noting that this can help respond to changing market conditions, viability, housing need, infrastructure requirements and design considerations. However, some were concerned that flexibility could be used to revisit or dilute commitments, including those relating to affordable housing, infrastructure, environmental standards and design quality. There were also concerns about the scope of developments to which the policy would apply.

The government has considered these responses and recognises the importance of improving build out rates and increasing transparency around delivery. Paragraphs 1 and 2 of policy HO13 are therefore being taken forward as proposed, with minor amendments to clarify the types of development to which the policy applies, and form part of a wider package of measures to support faster housing delivery. This includes proposals to implement powers in the Levelling-up and Regeneration Act 2023 relating to commencement notices, progress reports and the ability for local planning authorities to decline to determine applications where build out has been unreasonably slow, which were consulted on in 2025. Further details of these regulatory measures will be published in due course.

The government also agrees that greater clarity is needed on how flexibility should operate in practice. In response, paragraph 3 of policy HO13 has been amended so that it applies specifically to strategic sites, as defined in the glossary, and to clarify the balance between securing key requirements up-front and allowing appropriate flexibility as phases come forward. The policy makes clear that consenting frameworks should establish parameters for matters including design, infrastructure and affordable housing, while ensuring that the level of detail is proportionate to the scale and phasing of development.

Some respondents raised concerns about the relationship between paragraph 4 of policy HO13 and emerging development plans, including potential overlap with policy DM4 on prematurity. The government has considered these responses and has redrafted the policy to clarify that it applies in addition to DM4 where a development proposal affects a strategic site in an emerging development plan.

An additional fifth paragraph has been added to the policy to make clear which aspects of it apply to sites of different types.

Question 83: Do you agree with the proposed changes to the Housing Delivery Test rule book?

A total of 625 respondents answered Question 83. Of those, 18% strongly agreed, 21% partly agreed, 39% neither agreed nor disagreed, 7% partly disagreed and 13% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

There was broad support for improving clarity and consistency in how the Housing Delivery Test rule book is applied. Many respondents considered the proposed changes would simplify the rule book, reduce ambiguity and support a clearer and more consistent approach. Most respondents who disagreed with the proposals highlighted wider concerns with the Housing Delivery Test, particularly that it holds local authorities to account to factors outside their control. A minority of respondents raised concerns about the potential for SDSs to override local plans on adoption, given local authorities may not have had the opportunity to reflect higher SDS figures at the local plan level.

The government has carefully considered these responses and will proceed with the changes as consulted on. These changes will simplify the rule book and provide a more transparent basis for assessing housing delivery. The changes will apply from the 2026 Housing Delivery Test calculation and have not been applied to the calculation of the 2024 or 2025 results.

The 2024 and 2025 Housing Delivery Tests and an update to the Housing Delivery Test rule book have been published alongside this consultation response. The government has published both sets of results to re-establish a regular Housing Delivery Test publication cycle and ensure local authorities are being assessed against the most up-to-date data.

As part of wider efforts to simplify and streamline Housing Delivery Test calculations, the government has also implemented changes to the way the Housing Delivery Test has been calculated, informed by sector feedback outside of this consultation. This includes the removal of unmet need adjustments to Local Housing Need calculations. Unmet need is often inconsistently identified across local plans, making it complex and challenging to apply adjustments consistently, and resulting in some areas being measured against targets which did not accurately reflect need in their area. This change means that local authorities will be measured against either their plan requirement (where any agreed unmet need being taken or transferred to neighbouring authorities is already reflected within these figures), or Local Housing Need. The government considers this provides a more accurate and transparent measure of an area's housing requirement in the Housing Delivery Test. This change has been applied to the 2024 and 2025 Housing Delivery Test results.

Further, in recognition that it can take time for new housing targets to be reflected in housing delivery figures, the government has introduced a transitional arrangement for the new standard method (published in December 2024) to apply to the Housing Delivery Test. This transitional arrangement means the previous version of the standard method will continue to be used to calculate Local Housing Need until the 2026/27 measurement year.

Chapter 7 – Building a strong, effective economy

Responses for Questions 84, 85, 86 and 87 have been grouped.

Question 84: Do you agree that more emphasis should be placed on relevant national strategies and the need for flexibility in planning for economic growth, as drafted in policy E1?

A total of 765 respondents answered Question 84. Of those, 26% strongly agreed, 28% partly agreed, 22% neither agreed nor disagreed, 12% partly disagreed and 12% strongly disagreed. This indicates broad support for the proposal.

Question 85: Do you agree with the approach to meeting the need for business land and premises in policy E2?

A total of 736 respondents answered Question 85. Of those, 24% strongly agreed, 29% partly agreed, 24% neither agreed nor disagreed, 13% partly disagreed and 10% strongly disagreed. This indicates broad support for the proposal.

Question 86: Do you agree with the proposed new decision-making policy supporting freight and logistics development in policy E3?

A total of 657 respondents answered Question 86. Of those, 26% strongly agreed, 25% partly agreed, 32% neither agreed nor disagreed, 8% partly disagreed and 9% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses

Question 87: Do you agree with the approach to rural business development in policy E4?

A total of 663 respondents answered Question 87. Of those, 22% strongly agreed, 27% partly agreed, 28% neither agreed nor disagreed, 14% partly disagreed and 9% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

Generally, respondents to the consultation that support the proposals in this chapter have cited the clearer requirements in both plan-making and decision-making for economic development. Respondents also welcomed specific policies for freight and logistics and rural business development, recognising that there are specific planning and land use considerations for these types of proposals. Some respondents, however, were concerned that the chapter does not adequately account for potential environmental impacts of new commercial and agricultural development, particularly in relation to proposals for intensive livestock farming.

The government has considered these responses and has decided to take forward the proposed policies. No significant changes have been made to the chapter in response to the views received. Additional references to market signals have been incorporated into policy E1 in response to feedback that national policy should make explicit that this is a factor to consider in informing employment land requirements and allocations at the plan-making stage. A glossary term for freight and logistics has been introduced to clarify the types of uses that policy E3 applies to, in response to feedback that it could be interpreted widely. Several other minor drafting amendments have been made across the chapter to improve the clarity and consistency of the drafting.

In relation to the environmental impacts of development proposals, such as intensive livestock farming, policy E2 is designed to support improvements in animal welfare and the environment as well as food production. The Framework is clear that decision-makers should consider all relevant material considerations in making planning decisions, including where relevant other policies on land use impacts. Other changes to the Framework have strengthened the emphasis on climate change and introduced new chapters on water, energy and pollution. The Framework also sits alongside other regimes and environmental permitting that regulate potential pollution from agriculture and other uses.

Chapter 8 – Ensuring the vitality of town centres

Responses for Questions 88 and 89 have been grouped.

Question 88: Do you agree with the proposed changes to policy for planning for town centres?

A total of 677 respondents answered Question 88. Of those, 28% strongly agreed, 34% partly agreed, 25% neither agreed nor disagreed, 8% partly disagreed and 5% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Question 89: Do you agree with the approach to development in town centres in policy TC2? a) If not, please explain how you would achieve this aim differently.

A total of 640 respondents answered Question 89. Of those, 35% strongly agreed, 28% partly agreed, 28% neither agreed nor disagreed, 5% partly disagreed and 4% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

Respondents generally supported strengthening the policy framework to promote the long-term vitality and viability of town centres, including enabling a wider mix of uses and strengthening town centre strategies. There was particular support for recognising the need for centres to adapt to changing economic conditions and patterns of use. At the same time, a number of respondents emphasised the importance of maintaining the primary role of town centres, with concerns that increased flexibility, particularly in relation to residential development, could undermine town centre functions if not appropriately controlled. There was also strong support for retaining established tools such as primary shopping areas and recognising the role of markets in supporting town centre vitality.

The government has considered these responses and agrees that national planning policy should support the diversification and adaptation of town centres, while maintaining clear safeguards to ensure that their primary role is protected.

In response, the government has amended policy TC1 to make clearer that residential development is appropriate only where it would not undermine the vitality and viability of the town centre. The government has also reinstated explicit references to markets and primary shopping areas, reflecting their continued importance in plan-making and decision-making.

With regard to the glossary definition of “edge of centre”, the government has clarified that, where a primary shopping area has not been defined in the development plan, the edge-of-centre category continues to apply for retail development proposals and has provided a suitable fallback proxy. As made clear through policies S2 and TC1, primary shopping areas should be defined through the plan-making process wherever appropriate and remain the preferred reference point for identifying edge-of-centre locations. This amendment ensures that the sequential test continues to operate as intended where a primary shopping area has not yet been defined.

Responses for Questions 90, 91 and 92 have been grouped.

Question 90: What impacts, if any, have you observed on the operation of planning policy for town centres since the introduction of Use Class E?

A total of 390 respondents answered Question 90.

Question 91: Do you believe the sequential test in policy TC3 should be retained?

A total of 617 respondents answered Question 91. Of those, 39% strongly agreed, 20% partly agreed, 34% neither agreed nor disagreed, 3% partly disagreed and 4% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

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

A total of 586 respondents answered Question 92. Of those, 33% strongly agreed, 23% partly agreed, 34% neither agreed nor disagreed, 6% partly disagreed and 4% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

These responses indicate broad but qualified support for these policies, with a large proportion of neutral responses and consistent concerns about operation. Respondents recognised the benefits of Use Class E in enabling flexibility, supporting business adaptation and facilitating the reuse of vacant premises. However, some – particularly local planning authorities – considered that this flexibility has, in some cases, reduced the effectiveness of key planning tools, including control over changes of use through development management, the operation of primary shopping area and frontage policies, and the application of the sequential and impact tests.

The government has considered these responses and acknowledges the balance to be struck in ensuring that town centres remain both flexible and capable of being strategically planned. National planning policy sits alongside the Use Class Order and is intended to provide a clear framework within which local authorities can manage change, subject to the flexibilities for changes of use which the regulations allow. The government does not at present intend to alter Class E but will keep its operation under review.

In relation to Questions 91 and 92, respondents broadly supported retaining the sequential test and impact assessment as key national safeguards for town centres, though concern was expressed about the need to consider the wording on disaggregation introduced into policy TC3.

The government agrees that these tools remain central to the effective operation of the town centre first approach. Policy TC3 has however been amended to remove the additional wording on disaggregation. This had been added with the intention of reflecting relevant parts of the Planning Practice Guidance, but the government accepts that its inclusion as proposed could imply undue rigidity in the way the sequential test is intended to work. One further change has been made to policy TC3, to clarify that where the policy indicates that accessible sites should be preferred when considering edge of centre and out of centre locations, this means in relation to access by non-car modes.

For impact assessments, the government is maintaining the existing framework under policy TC4, including the use of locally set thresholds with a national default threshold.

Chapter 9 – Supporting high-quality communications

Question 93: Do you agree that the updated policies provide clearer and stronger support for the rollout of 5G and gigabit broadband?

A total of 621 respondents answered Question 93. Of those, 26% strongly agreed, 21% partly agreed, 36% neither agreed nor disagreed, 8% partly disagreed and 10% strongly disagreed. This indicates broad support for the proposal, with a significant number of neutral responses.

Government response

Respondents generally recognised the socio-economic benefits of high-quality digital connectivity and the importance of supporting the rollout of 5G and gigabit broadband. However, several respondents raised concerns about the removal of policy text in the current NPPF which emphasises the importance of telecommunications infrastructure and gives weight to it, and the potential implications this could have for network deployment. A range of comments was also made on specific aspects of the policies, with a particular focus on their operability in the face of changing technologies and competing pressures on land where telecommunications apparatus may be sited.

The government has considered these responses and agrees that national policy should provide strong support for the delivery of high-quality digital infrastructure. This is essential to achieving the government's digital connectivity ambitions and supporting economic growth and productivity.

In response, the government has amended the relevant telecommunications policies in the Framework to reinstate clear policy support for telecommunications infrastructure and to strengthen support for widespread and efficient network deployment. These changes provide greater clarity on the importance of digital infrastructure and support the continued rollout of high-quality connectivity across the country. Situations where other development could affect telecommunications are addressed by policy P4.

Question 94: Do you agree the requirements for minimising visual impact and reusing existing structures are practical for applicants and local planning authorities?

A total of 628 respondents answered Question 94. Of those, 31% strongly agreed, 25% partly agreed, 29% neither agreed nor disagreed, 7% partly disagreed and 9% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

Respondents generally agreed with the need to minimise visual impacts while recognising that telecommunications infrastructure must be capable of meeting operational and technical requirements. Several respondents emphasised the importance of retaining sufficient flexibility, particularly where existing infrastructure is being upgraded or replaced.

The government has considered these responses and agrees that policy should balance the need to minimise visual impacts with the practical requirements of delivering and maintaining modern telecommunications networks.

In response, the government has amended policy CO1 to refer expressly to the upgrading and replacement of existing infrastructure, recognising that replacing existing infrastructure can reduce the need for additional equipment and help limit proliferation. The government has also clarified that visual impacts should be minimised so far as practical considering operational requirements. These changes support network deployment while maintaining appropriate consideration of visual impacts.

Question 95: Do you agree the supporting information requirements are proportionate and sufficient without creating unnecessary burdens?

A total of 574 respondents answered Question 95. Of those, 24% strongly agreed, 21% partly agreed, 38% neither agreed nor disagreed, 7% partly disagreed and 10% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

Respondents who supported the proposal considered the requirements to be a proportionate means of informing decision-making. Others expressed concern that aspects of the proposed wording could create additional administrative burdens for applicants and local planning authorities.

The government has considered these responses and agrees that supporting information requirements should be proportionate and should assist decision-making without creating unnecessary burdens.

In response, the government has amended policy CO2 by removing the requirement to provide a summary of issues raised through engagement and how those issues have been addressed. This reflects concerns that the requirement could impose unnecessary administrative burdens while providing limited additional value. Reference to new structures in sub-paragraph (b) has also been removed as the intended focus of this aspect of the policy is locations for telecommunications infrastructure.

Overall, the government considers that the final policy framework strikes an appropriate balance between supporting the timely rollout of high-quality digital infrastructure and ensuring that proposals are assessed in a proportionate way, with appropriate regard to visual impact, existing infrastructure, operational requirements and local circumstances.

Chapter 10 – Securing clean energy and water

Question 96: Do you agree with the approach to planning for energy and water infrastructure in policy W1? a) Please provide your reasons, particularly if you disagree, what alternative approach would you suggest?

A total of 798 respondents answered Question 96. Of those, 32% strongly agreed, 34% partly agreed, 18% neither agreed nor disagreed, 9% partly disagreed and 8% strongly disagreed. This indicates strong support for the proposal.

Government response

Respondents supported a more proactive and coordinated approach to planning for energy and water infrastructure, recognising the importance of ensuring that development is aligned with infrastructure capacity and future requirements.

There was broad support for strengthening expectations around early engagement between plan-making authorities, infrastructure providers, regulators and network operators. Respondents welcomed the emphasis on considering infrastructure capacity, future needs and climate-related pressures through the plan-making process. Some respondents raised concerns about how early engagement would operate in practice, including the capacity and willingness of infrastructure providers to engage within plan-making timescales and the allocation of responsibilities between different organisations. Some respondents also sought greater clarity on the timing and status of emerging infrastructure plans, their relationship with plan-making, and whether they could be interpreted as restricting development to specific locations.

The government has considered these responses and agrees that the policy supports a more coordinated and forward-looking approach to energy and water infrastructure planning. The policy will help ensure that development is planned alongside the capacity and future requirements of energy and water infrastructure, while supporting effective collaboration between relevant parties. To support this outcome, a new sub-paragraph has been added to policy W1(2) clarifying that these factors should be taken into account in the location and phasing of planned growth.

The government has also considered concerns regarding the operation of early engagement and the role of infrastructure plans. The wider statutory framework already supports early engagement through consultation requirements and duties on prescribed bodies to assist plan-making authorities. The policy is clear that relevant strategic infrastructure plans should be considered when available and does not create requirements for when such plans have not yet been prepared. Where the timing of strategic infrastructure plans does not align with plan-making cycles, plan-making authorities will continue to draw on a wider evidence base as appropriate. The government does not consider that this policy would constrain development by limiting it to locations identified through strategic infrastructure plans.

In light of the support received and having considered the points raised, the government considers that the policy strikes an appropriate balance between supporting coordinated infrastructure planning and maintaining flexibility within the plan-led system.

Responses for Questions 97 and 98 have been grouped.

Question 97: Do you agree with the amendments to current Framework policy on planning for renewable and low-carbon energy development and electricity network infrastructure in policy W2?

A total of 726 respondents answered Question 97. Of those, 8% strongly agreed, 33% partly agreed, 23% neither agreed nor disagreed, 7% partly disagreed and 8% strongly disagreed. This indicates broad support for the proposal.

Question 98: Do you agree with the proposed approach to supporting development for renewable and low carbon development and electricity network infrastructure in policy W3? a) Please provide your reasons, particularly if you disagree, and any changes you would make to improve the policy.

A total of 758 respondents answered Question 98. Of those, 30% strongly agreed, 29% partly agreed, 20% neither agreed nor disagreed, 12% partly disagreed and 9% strongly disagreed. This indicates broad support for the proposal.

Government response

Respondents generally supported for the proposed approach to renewable and low carbon energy development and welcomed clearer policy direction for plan-making and decision-making.

There was similar support for the approach to electricity network infrastructure and the role of planning in supporting the transition to a low-carbon energy system.

There was broad support for identifying suitable areas for renewable and low carbon energy development, with respondents noting that this could provide greater certainty and support more coordinated delivery. However, several respondents raised concerns about how the identification of suitable areas would operate in practice, including the capacity of plan-making authorities and the evidence required to support such designations. Views were mixed on the proposed approach to decision-making, particularly the application of substantial weight and how it should be balanced against other planning considerations. Some respondents also raised concerns about the treatment of need and grid connection capacity, while others suggested greater alignment with the Critical National Priority approach set out in National Policy Statements.

The government has considered these responses and concludes that policies W2 and W3 provide a clear and appropriate framework to support renewable and low carbon energy development and electricity network infrastructure. The plan-making policy supports a spatial, evidence-based approach, informed by engagement with relevant infrastructure providers and technical stakeholders, while the decision-making policy appropriately reflects the significant benefits of renewable and low carbon energy and electricity network infrastructure.

The government recognises concerns about identifying suitable areas in plans. The policy requires the identification of areas suitable for renewable and low carbon energy, and opportunities to draw heat and energy from decentralised networks, only where these exist. To support effective implementation, Planning Practice Guidance will be updated to provide further guidance on the identification of suitable areas.

The government has also considered points raised in relation to decision-making. The application of substantial weight reflects the importance of renewable and low carbon energy and electricity network infrastructure. At the same time, it preserves the role of balanced planning judgement when determining individual proposals. The government does not consider it necessary to introduce a requirement to demonstrate need for such development, which would depart from a long-established policy position. Nor is it necessary to incorporate grid connection considerations into national planning policy, as these matters are addressed through separate regulatory frameworks that are subject to ongoing reform.

The government has considered responses relating to the glossary definitions. There was broad support for the proposed definitions of renewable and low carbon energy and electricity network infrastructure, with respondents generally agreeing that they provide clarity while remaining technology neutral. However, changes have been made to the glossary definition of renewable and low carbon energy to include long duration energy storage as an additional indicative example, reflecting its increasing importance to the energy system.

Overall, the government considers that policies W2 and W3 strike an appropriate balance between supporting the deployment of renewable and low carbon energy and electricity network infrastructure and maintaining a robust plan-led planning system. In light of the support received and having considered the points raised, the government is not amending policies W2 and W3 and is taking them forward broadly as consulted on.

Question 99: Do you agree with the proposed approach to supporting development for water infrastructure in policy W4?

A total of 714 respondents answered Question 99. Of those, 35% strongly agreed, 27% partly agreed, 23% neither agreed nor disagreed, 10% partly disagreed and 6% strongly disagreed. This indicates broad support for the proposal.

Government response

Respondents generally supported the objective of ensuring that water infrastructure is given appropriate weight in planning decisions. Many responses highlighted the importance of ensuring that new development is supported by adequate water supply, wastewater capacity and related infrastructure. Respondents also emphasised the need for early engagement between planning decisions and wider water infrastructure planning.

Some respondents suggested that the policy should go further by requiring capacity assessments, clearer tests of need, or stronger requirements on water efficiency, recycling and reuse. Others called for greater recognition of the wider benefits of water infrastructure, including for growth, public health, resilience and environmental improvement. Some also suggested that the policy should define water infrastructure more clearly or be widened to cover related matters such as flood schemes, habitats, biodiversity and sustainable drainage.

The government agrees that water infrastructure plays an essential role in supporting sustainable development, economic growth, public health and environmental resilience. However, the government does not consider that the Framework should be used to introduce additional requirements for individual capacity assessments, water efficiency, or the design of specific mitigation measures as these matters are already addressed though other planning policies and regulatory processes, and through the use of planning conditions or obligations where necessary. The government will continue to consider how these processes can be made more consistent and effective, including through guidance and wider work with the water sector. The government agrees that biodiversity, water quality, flood risk, sustainable drainage and wider environmental resilience are important considerations. However, these matters are addressed through other parts of the NPPF and other legislative routes. The government has also considered whether water infrastructure should be defined more precisely within the Framework or aligned more closely with National Policy Statements. It does not propose to include a specific definition, as this could unintentionally narrow the scope of the policy or exclude new and innovative forms of infrastructure as technologies and delivery models evolve.

Having considered the responses, the government is taking forward policy W4 broadly as consulted on. The government is committed to supporting farmers in strengthening their on-farm water resilience and will publish updated planning practice guidance on permitted development rights for on-farm reservoirs in September.

Chapter 11 – Facilitating the sustainable use of minerals

Question 100: Do you agree with the proposed prohibition on identifying new coal sites in policy M1, and to the removal of coal from the list of minerals of national and local importance?

A total of 615 respondents answered Question 100. Of those, 47% strongly agreed, 9% partly agreed, 33% neither agreed nor disagreed, 4% partly disagreed and 8% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

Respondents generally supported the proposed prohibition on identifying new coal extraction sites and the removal of coal from the list of minerals of national and local importance. Some respondents raised issues about energy security and costs and the need to maintain access to the country's coal reserves. The government has considered these responses, and notes that there has been no electricity generation from coal-fired power stations in Great Britain since October 2024. The changes set out in policy M1 align planning policy with the government's wider objectives to reduce reliance on fossil fuels, support the transition to cleaner sources of energy, and reflect proposed reforms to the licensing of coal extraction. Accordingly, coal has been removed from the list of minerals of national importance, while critical and growth minerals have been included.

The government has also considered concerns relating to industrial and heritage uses of coal. Existing coal licences are not affected by the proposed licensing reforms, and industrial and heritage users are expected to continue sourcing coal through existing supply arrangements.

Question 101: Do you agree with how policy M1 sets out how the development plan should consider oil and gas?

A total of 553 respondents answered Question 101. Of those, 22% strongly agreed, 19% partly agreed, 43% neither agreed nor disagreed, 6% partly disagreed and 11% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

Broadly respondents who agreed with how policy M1 sets out how the development plan should consider oil and gas said this was because it aligns with climate objectives and the transition to net zero. Some respondents called for stronger restrictions while others said that the policy as proposed is too restrictive and risks undermining domestic energy supply. Having considered the responses received, and since there was broad support for the proposal, the government has maintained the approach proposed for policy M1 on how development plans should consider oil and gas. However, the consultation raised other issues in relation to the overarching objective for the chapter and policy M1, which have been reflected in subsequent changes to the Framework.

Responses from the minerals sector raised concerns about the drafting of the overarching objective. These focused on the removal of the term “essential” and the potential implications for how the importance of mineral supply is reflected, as well as the risk that references to restricting minerals development that may harm environmental objectives could be interpreted too broadly.

The government has considered these responses and confirmed that the overarching objectives are intended to provide contextual framing for the policies that follow and are not to be applied as policy in their own right for plan-making or decision-making. In response to concerns raised, the government has reinstated the term “essential” to the chapter objective to reflect established terminology and to recognise the importance of minerals in delivering wider government objectives. The government has also clarified the objective to now refer directly to peat, coal and onshore oil and gas as development that is restricted for environmental reasons. This is to improve clarity and does not constitute a substantive change from the draft version of the Framework that was consulted upon. Respondents also raised concerns that replacing “steady and adequate” with “sufficient” could weaken policy expectations. The government has amended policy M1(1) to include the term “timely” alongside “sufficient”, clarifying that development plans should ensure minerals supply is both adequate in overall terms and responsive to changes in market demand.

In response to consultation feedback requesting that Mineral Planning Authorities be explicitly identified, the government has amended policy M1(2)(a) to clarify that Local Aggregate Assessments will continue to be prepared by the relevant Mineral Planning Authority. This amendment is intended to improve clarity and does not represent a substantive change in policy. Some respondents called for changes and additions to the landbank requirements in policy M1(2) and (3). The government considers that existing landbank requirements remain appropriate, given that the reformed plan-making system should enable minerals and waste plans to be prepared and updated more quickly, supported by Local Aggregate Assessments and the Managed Aggregate Supply System. Therefore, no further changes are proposed.

Question 102: Do you agree with the proposed addition of critical and growth minerals to the glossary definition of ‘minerals of national and local importance’?

A total of 508 respondents answered Question 102. Of those, 24% strongly agreed, 19% partly agreed, 47% neither agreed nor disagreed, 4% partly disagreed and 7% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

Many respondents noted that this was a welcome change given the importance of critical and growth minerals, although some raised concerns that a ‘two-tier’ system could be created between different minerals and there were some responses around which minerals should be seen as of most importance. Considering the broad support received, the government has continued with the proposal to add critical and growth minerals to the glossary definition of ‘minerals of national and local importance’.

Question 103: Do you agree criteria b of policy M2 strikes the right balance between preventing minerals sterilisation and facilitating non-minerals development?

A total of 506 respondents answered Question 103. Of those, 15% strongly agreed, 21% partly agreed, 50% neither agreed nor disagreed, 8% partly disagreed and 6% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

Respondents recognised the importance of safeguarding mineral resources and ensuring that opportunities for prior extraction are considered where necessary and feasible, helping to protect finite geological resources from unnecessary sterilisation. There was broad support for the principle of mineral safeguarding and the role of Mineral Safeguarding Areas in protecting both mineral resources and associated infrastructure from sterilisation by non-mineral development. Respondents emphasised the need for safeguarding to operate over the long term, with several supporting further strengthening policy on prior extraction, and calling for a more consistent and evidence-based approach to assessing the potential impacts of development on mineral resources and infrastructure. Respondents also raised concerns about how mineral safeguarding policies would operate in practice, including how mineral resources should be protected from non-mineral development and how safeguarding should be balanced against the need for housing and other forms of development.

The government has considered these responses and acknowledges the strong support for safeguarding mineral resources for future use and avoiding their sterilisation through non-mineral development. In response, the government is retaining policy M2(1)(b) and the overall approach to mineral safeguarding. The policy will continue to support the safeguarding of mineral resources and associated infrastructure, including consideration of prior extraction where appropriate. We will consider whether further clarity on the approach could be provided through our wider review of Planning Practice Guidance in due course.

Question 104: Do you agree policy M3 appropriately reflects the importance of critical and growth minerals?

A total of 492 respondents answered Question 104. Of those, 18% strongly agreed, 19% partly agreed, 51% neither agreed nor disagreed, 5% partly disagreed and 7% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

The government considers that the revised policy appropriately reflects the role of critical and growth minerals in supporting economic growth, resilience, national security and the transition to a low-carbon economy.

Some respondents expressed concern that this could create a perceived hierarchy between mineral types by separating out critical and growth minerals from other minerals, Others said that replacing “great weight” with “substantial weight” may reduce support for minerals development. The government does not agree because the term “substantial weight” is intended to provide consistency across the Framework and represents the highest level of weight applied in planning policy. Its use does not diminish the policy support afforded to minerals development. Conversely, the inclusion of critical and growth minerals reflects their increasing importance in supporting the clean energy transition, net zero ambitions and key growth sectors identified in the Industrial Strategy. The government continues to recognise the importance of aggregates and industrial minerals, which remain supported through the Framework, specifically policy M1(1)(2) and (3).

Responses for Questions 105 and 106 have been grouped.

Question 105: Do you agree with the exclusion of development involving onshore oil and gas extraction from policy M3?

Question 106: Please provide your reasons, particularly if you disagree.

A total of 551 respondents answered Questions 105 and 106. Of those, 34% strongly agreed, 11% partly agreed, 42% neither agreed nor disagreed, 5% partly disagreed and 9% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

Generally, there was broad support for the removal of oil and gas from the policy requirement to give substantial weight to the benefits of mineral extraction. These changes reflect the government’s wider objectives of supporting the transition to a low-carbon economy, delivering net zero, and promoting sustainable economic growth.

However, some respondents said that continued recognition of the benefits of onshore oil and gas extraction remains important for energy security, economic growth and certain industrial uses, and called for greater policy flexibility to support the transition to a low-carbon economy. Conversely, others advocated a complete prohibition on onshore oil and gas extraction to encourage greater investment in renewable and low-carbon energy sources. Having considered the responses received, the Government has maintained its approach to exclude onshore oil and gas from the requirement to give substantial weight to the benefits of such extraction in decision-making in line with its wider oil and gas policy (as set out in the North Sea Future Plan in November 2025).

Some also raised concerns that excluding oil and gas from M3 could mean that sites are inadvertently prevented from undertaking routine or minor amendments needed for existing sites. However, these are not prohibited through the Framework and policy M4 would apply in these situations.

In response to broader consultation feedback seeking clarity on whether processing is included, the government has amended policy M3(1) to include minerals processing, clarifying that the policy applies to both mineral extraction and associated processing activities.

In relation to suggestions that recycled aggregates should be referenced within minerals policy, the government intends to consult on revisions to the National Planning Policy for Waste in 2026, which will provide the appropriate opportunity to consider such matters.

Responding to representations on the importance of local building stone, the government has amended policy M3(1)(e) to recognise the role of building and roofing stone in construction. This change supports the conservation and enhancement of local character, including the historic environment, while also contributing to the delivery of high-quality development.

Responses for Questions 107 and 108 have been grouped.

Question 107: Do you agree policy M4 sufficiently addresses the impacts of mineral development, noting that other national decision-making policies will also apply?

Question 108: Please provide your reasons, particularly if you disagree

A total of 539 respondents answered Question 107 and 108. Of those, 17% strongly agreed, 20% partly agreed, 44% neither agreed nor disagreed, 8% partly disagreed and 11% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

Respondents broadly supported the principle that minerals development should not give rise to unacceptable adverse impacts on the natural and historic environment or on human health. They recognised the importance of restoration and aftercare in securing long-term environmental benefits and acknowledged the temporary nature of mineral extraction. However, some respondents raised concerns about environmental and health impacts and emphasised the need for decision-making to fully reflect wider environmental policies and objectives. There were also calls for greater clarity on how impacts would be assessed and how the policy would operate alongside other regulatory regimes.

The government has considered these responses and remains clear that minerals development should not result in unacceptable adverse impacts on the natural or historic environment, or on human health. Minerals development proposals will continue to be assessed against the full suite of relevant policies in the Framework, including policy DM7 on the relationship with other regulatory regimes. Policy DM7 provides that development proposals should be assessed on whether they represent an acceptable use of land, while assuming that separate regulatory regimes will operate effectively unless there is clear evidence to the contrary.

The government also recognises the important role that restored mineral sites can play in enhancing biodiversity and delivering wider environmental benefits. Policy M4 will continue to require minerals development proposals to provide for restoration and aftercare at the earliest opportunity and to the highest environmental standards.

In response, the government has amended policy M4(1)(a) to include the words "taking into account the national decision-making policies in this Framework". This clarifies that assessments of unacceptable adverse impacts should be undertaken in accordance with the relevant national decision-making policies set out elsewhere in the Framework. The amendment improves consistency in the interpretation and application of the policy, reinforces established approaches, including the mitigation hierarchy, and supports robust and proportionate decision-making, including in relation to cumulative effects.

Responses for Questions 109, 110 and 111 have been grouped.

Question 109: Do you agree with approach to coal, oil and gas in policy M5?

A total of 545 respondents answered Question 109. Of those, 18% strongly agreed, 18% partly agreed, 44% neither agreed nor disagreed, 7% partly disagreed and 13% strongly disagreed. This indicates mixed views, with a significant proportion of neutral responses.

Question 110: Are there any other exceptional circumstances in which coal extraction should be permitted? Yes/No

Question 111: If yes, please outline the exceptional circumstances in which you think coal extraction should be permitted.

A total of 421 respondents answered Question 110 and 111. Of those, 25% agreed and 75% disagreed. This indicates broad opposition to the proposal.

Government response

Respondents raised concerns about the potential impact of the policy on energy security and the availability of domestic energy resources. There was broad support for aligning national planning policy with wider government objectives on climate change and the transition to a low-carbon economy, including the protection of peat soils as significant carbon stores.

Some respondents highlighted the need for the policy to clearly recognise circumstances where coal extraction may be necessary to facilitate other forms of development, such as ground stabilisation, remediation, or the extraction of other minerals, including fireclay.

The government recognises that there may be limited circumstances in which the extraction of coal is incidental to, and necessary for, another form of development or the winning and working of other minerals. In response to consultation feedback, policy M5 has been amended to provide a clear exception where the removal of coal is necessary to enable the extraction of another mineral of national or local importance, for land stability purposes, or to facilitate development that can only proceed through the removal of shallow coal deposits. This amendment avoids unintended constraints on development while maintaining the overall policy approach to coal extraction.

Concerns were raised about the alignment between planning policy and the onshore oil and gas licensing regime, including circumstances where the production of oil and gas onshore may be incidental to other forms of development, such as gas storage facilities.

In response, the government has made a small amendment to policy M5(2)(a) so that it reflects policy set out in the government's North Sea Future Plan in November 2025. This recognises that incidental production may occur as part of carbon capture and storage, onshore storage of gas, or geothermal energy activities.

In response to comments relating to unconventional shale gas extraction, commonly referred to as "fracking", the government's position remains clear. There is an effective moratorium on fracking for shale gas ("associated hydraulic fracturing" as defined by the Petroleum Act 1998), which will continue to apply to existing licences. The government is also committed to delivering its manifesto commitment to ban fracking.

Low-volume hydraulic fracturing used as a reservoir stimulation technique in conventional oil and gas reservoirs, is distinct from shale gas fracking and is not covered by the moratorium.

The government considers that these amendments provide greater clarity for decision-makers and applicants, ensuring that essential development is not unduly constrained while continuing to support wider environmental and climate change objectives. Peat soils will continue to receive protection through policy CC2 on climate change mitigation, reflecting their importance as carbon stores and aligning with wider environmental policy.

Responses for Questions 112 and 113 have been grouped.

Question 112: Do you agree policy M6 strikes the right balance between preventing the sterilisation of minerals reserves and minerals-related activities, and facilitating non-minerals development?

A total of 475 respondents answered Question 112. Of those, 13% strongly agreed, 17% partly agreed, 58% neither agreed nor disagreed, 9% partly disagreed and 4% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Question 113: Does policy M6 provide sufficient clarity on the role of Minerals Consultation Areas?

A total of 476 respondents answered Question 113. Of those, 14% strongly agreed, 16% partly agreed, 59% neither agreed nor disagreed, 7% partly disagreed and 4% strongly disagreed. This indicates mixed views, with a significant proportion of neutral responses.

Government response

Respondents supported the proposed approach to consolidating and reframing existing Framework provisions to strengthen their application in planning decisions and to clarify the role of Mineral Consultation Areas. Several respondents emphasised the importance of ensuring that mineral safeguarding policies do not unnecessarily constrain existing or proposed minerals development, including associated infrastructure, and highlighted the need to maintain the operational viability of mineral sites and facilities.

Some respondents raised concerns about the use of the term “foreseeable”, suggesting that it could create uncertainty in decision-making and lead to an overly restrictive approach to safeguarding. Others emphasised the importance of ensuring that safeguarding requirements remain proportionate and do not place unnecessary burdens on the planning process or delay non-mineral development.

The government has considered these responses and remains committed to ensuring that mineral resources are safeguarded for future use while supporting effective planning decisions and the continued operation of minerals development. The government also recognises the need for a proportionate approach that balances safeguarding with the delivery of other forms of development.

In response, the government has amended policy M6(1)(a) to replace the term “likely or foreseeable” with “potential”, reinstating the wording used in the December 2024 Framework. This change provides greater clarity and supports a more consistent approach to mineral safeguarding.

Policy M6(1)(b) has also been amended to include the term “constrain”, reflecting concerns that safeguarding policies should not result in unnecessary constraints on existing or proposed minerals development, including associated infrastructure, and recognising the importance of maintaining the operational viability of mineral sites and facilities.

Policies M6 and M2 address mineral safeguarding in policy and decision-making. The government acknowledges requests for further guidance in these areas and will consider these comments when Planning Practice Guidance is reviewed and updated in due course.

Chapter 12 – Making effective use of land

Responses for Questions 114 and 115 have been grouped.

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

Question 115: If not, what further guidance is needed?

A total of 851 respondents answered Question 114. Of those, 23% strongly agreed, 40% partly agreed, 18% neither agreed nor disagreed, 13% partly disagreed, and 8% strongly disagreed. This indicates broad support for the proposal.

Government response

There was broad support for accommodating as much development as possible on previously developed land. Some respondents emphasised the importance of local plans considering land use holistically, taking into account the natural environment, heritage, local character and infrastructure capacity. Respondents generally supported the proposed approach to identifying appropriate locations for development, however some raised concerns in relation to the specific typologies and design principles set out to support intensification. Many respondents considered that the policy could be clearer, particularly around the scale of ambition expected on allocated sites and on larger-scale developments. Some respondents also requested further guidance to support implementation in plan-making.

The government has carefully considered these responses and remains committed to strengthening the role of local plans in promoting the efficient use of land and supporting sustainable development. In response to the concerns raised, a number of changes have been made to improve policy clarity and support implementation.

Policy L1(1)(a) has been amended to encourage plans to identify specific areas with scope to support intensification through additional development. This will enable local plans to better support the intensification of urban and suburban areas encouraged by policy L2, and ensure that this development comes forward in the right places.

Policies L1(1)(a)(iii) and (b) have been amended to provide additional clarity about the types of opportunities which plans may promote, and the role of masterplans in helping to optimise these.

Taken together, the government considers that these changes provide greater clarity and consistency in identifying opportunities to meet development needs and maximise development potential on previously developed land.

Responses for Questions 116, 117, 118, 119, 120, 128 and 129 have been grouped.

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

A total of 805 respondents answered Question 116. Of those,18% strongly agreed, 39% partly agreed, 20% neither agreed nor disagreed, 13% partly disagreed, and 10% strongly disagreed. This indicates broad support for the proposal.

Question 117: Do you agree policy L2 identifies appropriate typologies of development to support intensification? a) If not, what typologies should be added or removed and why?

A total of 738 respondents answered Question 117. Of those, 25% strongly agreed, 30% partly agreed, 23% neither agreed nor disagreed, 12% partly disagreed, and 10% strongly disagreed. This indicates broad support for the proposal.

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

A total of 694 respondents answered Question 118. Of those, 19% strongly agreed, 27% partly agreed, 25% neither agreed nor disagreed, 17% partly disagreed, and 12% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Question 119: Do you agree policy L2 (d)(i) achieves its intent to enable appropriate development that may differ from the existing street scene, particularly in cases such as corner plot redevelopment and upwards extensions?

A total of 687 respondents answered Question 119. Of those, 16% strongly agreed, 22% partly agreed, 25% neither agreed nor disagreed, 15% partly disagreed, and 20% strongly disagreed. This indicates mixed views, with support and opposition broadly balanced.

Question 120: Do you agree with the proposed safeguards in policy L2 that allow development in residential curtilages?

A total of 689 respondents answered Question 120. Of those, 10% strongly agreed, 29% partly agreed, 27% neither agreed nor disagreed, 18% partly disagreed, and 15% strongly disagreed. This indicates mixed views, with support and opposition broadly balanced.

Question 128: Do you agree policy L4 provides clear high-level guidance on good design for residential extensions?

Question 129: Please provide your reasons, particularly if you disagree.

A total of 660 respondents answered Questions 128 and 129. Of those, 13% responding to Question 128 strongly agreed, 29% partly agreed, 28% neither agreed nor disagreed, 17% partly disagreed, and 14% strongly disagreed. This and the supporting comments indicate mixed views, with support and opposition broadly balanced.

Government response

There was broad support for the aims of this policy, including making more efficient use of land, and encouraging appropriate intensification of existing development. However, some respondents called for greater flexibility in relation to specific development typologies. Some considered that the proposals were unnecessarily restrictive, and should relate to additional floorspace as well as extra units, or should indicate support for building upwards in a wider range of locations. Others raised concerns that safeguards in policy L2(1)(d)(iii) could constrain otherwise appropriate development, particularly in suburban and village locations. In contrast, some respondents sought additional safeguards, particularly to help protect local character.

In response to consultation feedback, the government has made a number of changes to improve policy clarity, scope and operability. Policy L2(1)(d) has been amended to make clear that the expansion of existing residential or commercial spaces is encouraged to create both additional homes and additional floorspace. This is in recognition that expanding existing properties can be beneficial to support different housing needs, including family housing. Given policy L2(1)(d) has been amended to include residential extensions and provides similar safeguards for development as draft policy L4, a separate policy on extensions is no longer considered necessary. As such, policy L4 has been removed.

In response to concerns that policy L2(1)(d)(i) was overly restrictive, the government has broadened the circumstances in which it may be acceptable for redevelopment not to be consistent with the overall street scene. Those exceptions now include where the development would not cause substantial harm to the character of a building or its surroundings, or where the development is not visible from the street frontage.

The government has also amended the parameters for development within residential curtilages in policy L2(1)(d)(iii). This change supports greater flexibility, by enabling development to come forward where it does not meet all of the policy safeguards, provided it would not harm the overall character of the area and has regard to infrastructure capacity and sustainable locations. Taken together, these changes support ambitions to make the best use of land in built-up areas and encourage a range of development proposals to come forward in appropriate locations, while responding to the character of local areas.

Question 121: Do you agree policy L3 provides clear guidance on achieving appropriate densities for residential and mixed-use schemes?

A total of 797 respondents answered Question 121. Of those, 17% strongly agreed, 31% partly agreed, 20% neither agreed nor disagreed, 19% partly disagreed, and 14% strongly disagreed. This indicates mixed views, with more support for the proposal than opposition.

Government response

There was broad support for higher density development in locations with good public transport accessibility, particularly around transport hubs. Some respondents highlighted the importance of ensuring higher density development is supported by necessary infrastructure, respects local character and delivers high-quality design. Other respondents noted that minimum densities should not prevent authorities from meeting the housing needs of different groups or delivering a range of tenures. Some respondents also raised concerns that the proposed presumption in favour of sustainable development could be disapplied too readily where the proposed policy was not complied with, noting that the 'should be refused' provision of the policy was too broad in its application.

In response to these concerns, the government has made a number of changes to support policy clarity and operability. Changes have been made to policy L3(2)(a) to recognise that achieving an increase in density may not always be possible or desirable. For example, in areas of existing high density, some development may come forward at lower densities in order to help deliver a broader mix of housing or meet specific local needs. The impact of minimum density requirements on Gypsy and Traveller communities has been considered in the response to Question 122.

The government has also amended policy L3(4) to narrow the scope of the 'should be refused' provision so that it applies only to the requirements set out in L3(2). This ensures the policy is more targeted and addresses concerns that the consultation draft provided too many potential routes for the refusal of applications.

To consolidate policy on making efficient use of land, the government has also moved wording relating to the optimisation of development footprints from policy L2 to policy L3. The scope of this policy has been changed to refer to land currently outside settlements, in order to complement policy L3(2)(a) which covers land within settlements.

Responses for Questions 40, 122, 126 and 127 have been grouped.

Question 40: Do you agree with the proposed approach to development around stations, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12? a) Please provide your reasons, including any evidence that this policy would lead to adverse impacts on Gypsies and Travellers and other groups with protected characteristics.

A total of 1,168 respondents answered Question 40. Of those, 17% strongly agreed, 26% partly agreed, 16% neither agreed nor disagreed, 15% partly disagreed and 27% strongly disagreed. This indicates mixed views, with support and opposition broadly balanced/.

Question 122: Do you agree with the minimum density requirements set out within policy L3? Please provide your reasons, particularly if you disagree. b) Could these minimum density requirements lead to adverse impacts on Gypsies and Travellers and other groups with protected characteristics? Please provide your reasons, including any evidence

A total of 813 respondents answered Question 122. Of those, 13% strongly agreed, 25% partly agreed, 20% neither agreed nor disagreed, 20% partly disagreed, and 23% strongly disagreed. This indicates mixed views, with support and opposition broadly balanced.

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

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

A total of 539 respondents answered Question 126 and 127. Of those answering Question 126, 38% agreed, and 63% disagreed. This indicates broad opposition to the proposal.

Government response

There was broad support for making the best use of land in areas with good connectivity and increasing densities to meet the housing needs of communities. There was, however, a range of views in relation to setting minimum density requirements for development in these locations. Some respondents favoured a more flexible approach, such as gradated or tiered density ranges, based on factors including proximity to stations or whether land is brownfield or greenfield. Some respondents considered that residential densities should be determined locally, reflecting site-specific context, market conditions and character.

A range of views was received on the minimum densities proposed. Some respondents considered the proposed densities to be unambitious – especially in inner urban areas and other places with high levels of connectivity and demand for housing. Others considered they could create viability and market demand challenges in some locations, particularly where density requirements rely on partially flatted development to come forward. Some respondents thought that more rural locations, and areas with lower land values, could be most affected by these challenges. Some expressed particular concern about the way the policy could be perceived to introduce upper density limits, suggesting these could limit ambition in the most accessible and sustainable locations. Finally, some respondents sought greater clarity on policy wording and associated definitions.

In response to these concerns, the government has made changes to remove density requirements around stations with lower service levels, to support a more gradated approach to density around 'well-connected' stations, and to strengthen expectations for more ambitious densities where possible, especially in locations with high connectivity to services and jobs.

Concerns were also raised that imposing minimum density standards around stations with irregular or infrequent services could lead to inappropriate development and undermine wider efforts to support sustainable patterns of growth. The government has responded by removing the minimum density requirement of 40 dwellings per hectare around stations that do not meet the definition of 'well-connected'. This also responds to concerns that this density requirement could create viability challenges in some locations and could hinder development coming forward. The government is satisfied that wider policies in the Framework will support the effective use of land in these locations.

In response to the consultation responses, the government has revised the approach to minimum density requirements around ‘well-connected’ stations, adopting a tiered approach in line with service frequency, as opposed to a blanket requirement of 50 dwellings per hectare. The following minimum densities will apply around ‘well-connected’ stations:

- 35 dwellings per hectare for ‘well-connected’ stations with a service frequency of 4+ trains per hour
- 45 dwellings per hectare for ‘well-connected’ stations with a service frequency of 8+ trains per hour

These minimum density requirements enable a more responsive approach, reflecting that high frequency (i.e. 8 or more trains or trams/hour) stations are usually in major urban areas and town centres, and can therefore support higher densities. Stations with slightly lower frequencies (i.e. above 4 trains or trams/hour) also have a good level of service but are often located away from major cities and might be in more rural areas where there may be less demand for higher density development. The government proposes to apply a minimum density of 35 dwellings per hectare around these stations. This will avoid development at the lowest densities coming forward, while still representing a significant uplift from the existing context in some cases.

This slight lowering of expected minimum density requirements in some situations directly responds to concerns that the proposals as consulted on would be unviable in some locations and would not allow for range of housing types to come forward in line with needs. The revised density requirements will better support development to come forward across a range of geographical contexts and housing markets.

The government is, however, clear that these requirements are minimum floors and expects development to come forward at much higher densities around many stations, particularly in urban areas. Policy L3 has been amended to make clear that development should exceed these minimum thresholds where possible, especially in areas of high connectivity; the Connectivity Tool is intended to be used to support the identification of such areas. Policy L1 also continues to encourage plans to set density standards, including density ranges where appropriate, which are tailored to local context – and these are expected to go beyond those set out in policy L3 where locations have a high level of connectivity.

The government agrees that introducing national density ranges in a way which could be interpreted as setting upper limits would limit ambition in certain locations. The government is satisfied that the introduction of a more gradated approach to density, in line with service frequency, coupled with making clearer that these are minima, will achieve the aim of making more efficient use of land while ensuring development responds to local context and levels of connectivity.

Respondents raised concerns that minimum density requirements may be difficult to achieve for traveller sites and for some smaller sites in certain circumstances (such as the shape of a site). In response, the government has introduced exceptions to the minimum density requirements for all traveller sites and for sites which fall below the threshold for major development where meeting the standards is either inappropriate or not possible. These changes will help ensure that smaller sites remain deliverable, whilst avoiding unintended impacts on traveller communities. As outlined above, the government has committed to publish Planning Practice Guidance to consider how traveller sites can make the most effective use of land.

To support policy clarity and operability, the government has also introduced a new definition of 'reasonable walking distance' to the glossary. We will consider whether updates to Planning Practice Guidance are needed to support policy implementation.

Taken together, these changes seek to drive density in the right locations and set clear expectations for dialling up ambition in urban and highly connected areas, while ensuring proposals remain deliverable.

Question 123: Do you agree that using dwellings per hectare is an appropriate metric for setting minimum density requirements? Additionally, is our definition of 'net developable area' within the NPPF suitable for this policy?

A total of 698 respondents answered Question 123. Of those, 25% strongly agreed, 23% partly agreed, 25% neither agreed nor disagreed, 14% partly disagreed, and 13% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

There was broad support for the use of a clear and consistent density metric, with respondents considering dwellings per hectare to be a well understood measure that could improve consistency in plan-making and decision-making. However, some respondents raised concerns about the potential for the metric to be applied too rigidly, emphasising the need for flexibility to reflect local circumstances, design considerations, infrastructure capacity and environmental constraints. Respondents also raised concerns about the proposed definition of net developable area, particularly regarding its clarity, consistency with existing guidance and the potential for differing interpretations in practice.

Taking into account the consultation responses, the government has retained the use of dwellings per hectare as the metric for minimum density requirements as consulted on. The government considers that dwellings per hectare remains the most effective and widely understood metric for setting minimum density requirements for the purposes of policy L3 – although it recognises that other density metrics may be valuable in other contexts. The government will amend Planning Practice Guidance to provide guidance on the circumstances in which other density metrics may be appropriate.

After careful consideration of the consultation responses, the government has amended the definition of 'net developable area' to provide greater clarity, particularly on what should be excluded when calculating site density.

These changes will ensure greater clarity, consistency, and support policy implementation. The government will amend Planning Practice Guidance to provide further guidance on the calculation of 'net developable area' for the purposes of policy L3.

Question 124: Do you agree with the proposed definition of a 'well-connected' station used to help set higher minimum density standards in targeted growth locations? In particular, are the parameters we're using for the number of Travel to Work Areas and service frequency appropriate for defining a 'well-connected' station?

A total of 899 respondents answered Question 124. Of those, 16% strongly agreed, 21% partly agreed, 18% neither agreed nor disagreed, 16% partly disagreed and 30% strongly disagreed. This indicates mixed views, with support and opposition broadly balanced.

Government response

Respondents generally supported the principle of maximising development opportunities around stations with good connectivity. There were however more mixed views on how this should be achieved. The responses highlighted a wide range of views regarding the definition of a 'well-connected' station. Many respondents considered that the proposed metrics are insufficient, suggesting that factors such as service reliability, journey times and onward travel from the station should also be considered. Some considered that the definition could lead to inappropriate development in some locations, particularly in rural areas. Some also suggested it should allow for greater flexibility in response to local factors. In some cases, respondents advocated further clarity on key aspects of the proposed definition.

Respondents also raised concerns about the use of Travel to Work Areas (TTWAs), citing the age of the data, the focus on work trips, the fact TTWAs cover all modes of transport and not just rail and trams, and annual changes to Gross Value Added (GVA) figures. Some respondents also questioned the TTWA threshold that was consulted on, noting that the top 60 TTWAs by GVA could omit stations considered suitable for development, and suggested increasing the TTWA threshold to maximise development opportunities. Views were also mixed on whether the proposed service frequency threshold should be higher or lower. Some respondents considered that a service frequency of four trains per hour is insufficient to encourage modal shift to rail. Others considered that a lower service frequency would be beneficial as it would bring more land into the scope of the policy. Although a range of views was received on the different aspects of the definition, there was no clear consensus on an alternative approach.

The government welcomes the range of views received on alternative definitions, but considers that measures such as service reliability, journey times or onward travel, which vary significantly across different locations and over time, would be challenging to implement in practice. Such metrics would likely add complexity to the proposals, and undermine wider efforts to support a clear, rules-based planning system.

In response to consultation feedback, a range of changes has however been made to support policy clarity and implementation.

The government has carefully considered the consultation responses and decided to amend the definition of 'well-connected' stations, expanding it from stations and stops within the top 60 TTWAs by GVA to those within the top 80 TTWAs by GVA. This change responds to consultation feedback that the top 60 TTWA threshold omitted some locations with high levels of connectivity and economic activity that would be suitable for supporting higher density growth. The revised top 80 TTWA threshold broadens the scope of the policy to maximise development opportunities, while continuing to focus growth in sustainable locations with good access to jobs and services. The government has maintained its approach to service frequency, with at least four trains or trams per hour (in either direction), which generally corresponds to two trains or trams in each direction.

The government acknowledges the limitations of TTWAs as raised by consultees. However, the government considers that a measure of economic geography is necessary to ensure that higher density development comes forward in areas with sufficient demand and access to jobs and services. In response to concerns relating to annual changes in GVA, the government has decided to fix the GVA figure using 2023 levels which is the most recent year for which data is available. This will be updated every five years, beginning with the publication of the 2028 GVA data. This change seeks to provide greater certainty to the sector by avoiding annual changes, whilst remaining responsive to economic changes over time.

The government recognises that setting a threshold of the top 80 TTWAs by GVA will not capture every station that has the potential to support higher density development. However, increasing the threshold further beyond the top 80 TTWAs will start to capture more rural and isolated areas that are further from economic centres, with more limited access to jobs and services. This is likely to lead to inappropriate development and undermine wider objectives to support sustainable patterns of growth. To ensure other suitable locations for development come forward, policy S2 expects plans to set out a spatial strategy which enables development to come forward in suitable locations to meet the identified need for housing and other uses.

The government acknowledges that raising the service frequency threshold for identifying 'well-connected' stations would better support 'turn up and go' transport use and focus the policy on larger urban centres. However, it would reduce the overall number of stations captured and limit development opportunities for stations outside of large urban areas. Lowering the frequency threshold to two trains per hour would bring more land into scope of the policy, but this would include stations with just one train an hour in each direction, which is unlikely to be sufficient to support higher density development or sustainable travel patterns. Sufficient train frequency is particularly important for education and many work journeys where start and end times are fixed. The definition continues to include stations where a reasonable prospect of increased frequencies is agreed with the rail operator, or where upgrades are planned which provide a reasonable prospect of increased frequencies. Additionally, the proposed density thresholds described above set a more ambitious standard for those stations with the highest frequencies.

The government considers that the definition strikes an appropriate balance between supporting higher density development in locations with sufficient transport infrastructure and access to services, while limiting inappropriate development and unsustainable patterns of growth.

The government recognises that the definition of 'well-connected' station includes several aspects requiring interpretation. It will consider whether updates to Planning Practice Guidance are needed to support policy implementation.

The proposed definition of a ‘well-connected’ station was originally set out in a footnote to policy L3. To improve clarity and consistency, the definition has now been moved to the glossary of the finalised NPPF.

Question 125: Are there other types of location (such as urban core, or other types of public transport node) where minimum density standards should be set nationally? a) If so, how should these locations be defined in a clear and unambiguous way and what should these density standards be?

A total of 560 respondents answered Question 125. Of those, 47% agreed and 53% disagreed. This indicates mixed views, with support and opposition broadly balanced.

Government response

The consultation responses showed a broad range of views in relation to setting minimum density standards in additional locations. Some respondents considered that minimum density standards should be set in places served by public transport modes other than train or tram, and in urban cores and town centres. Others proposed applying standards near major institutions, such as large employers or hospitals, or more widely to all new development. Respondents also emphasised the need for safeguards and exceptions to reflect local circumstances and site-specific constraints.

The government has carefully considered the consultation responses and has decided not to extend minimum national density standards to other locations. In contrast to train and tram stations, many of the additional locations identified are hard to define on a nationally consistent basis, particularly in a way that reflects their ability to support increased densities. However, the government wants to ensure that densities in urban areas, and other highly connected and suitable locations, remain ambitious. To support this objective, policy L1 encourages development plans to set density standards for town centres and locations that have a high level of connectivity, reflecting their specific characteristics and capacity to support growth. This approach enables authorities to identify the most suitable locations in their areas and set ambitious densities that can maximise development potential.

Chapter 13 – Protecting Green Belt land

Responses for Questions 130, 131, and 132 have been grouped.

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

Question 131: Please provide your reasons, particularly if you disagree.

A total of 689 respondents answered Questions 130 and 131. Of those responding to Question 130, 25% strongly agreed, 18% partly agreed, 27% neither agreed nor disagreed, 9% partly disagreed, and 20% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Question 132: Do you agree policy GB2 gives sufficient detail on the expected roles spatial development strategies and local plans play in assessing Green Belt land?

A total of 797 respondents answered Question 132. Of those, 16% strongly agreed, 19% partly agreed, 23% neither agreed nor disagreed, 10% partly disagreed, and 33% strongly disagreed. This indicates mixed views, with support and opposition broadly balanced.

Government response

There was general support for the revised approach to Green Belt policy, particularly in providing greater clarity on when new Green Belt may be established and the role of spatial development strategies in undertaking strategic Green Belt assessments. However, many respondents sought further clarity on key aspects of the policy. This included how long-term growth ambitions should be considered, the definition of development scale, and the respective roles of spatial development strategies and local plans in reviewing Green Belt.

The government has carefully considered these responses and has made changes to improve policy clarity and support implementation. This includes confirming that long-term growth ambitions may extend beyond the plan period. We have also made changes to policy GB2 to ensure consistency of wording regarding the Green Belt purposes, and changes to policy GB4 to recognise that villages lying in the Green Belt should not be identified as settlements for the purpose of the spatial strategy in the development plan. In relation to the different roles of spatial development strategies and local plans in considering Green Belt, we consider that the policies are sufficiently clear that local plan proposals should be informed by, and broadly consistent with, the spatial development strategy, but the policy does not prevent local plans from progressing Green Belt assessments and proposals in advance of spatial development strategy publication. A small adjustment for clarity has been made to the wording in Annex E, relating to Green Belt purpose B.

The government recognises that further guidance may be helpful to support spatial development strategy-led strategic reviews of the Green Belt and will consider producing guidance on the considerations that should inform this process.

Responses for Questions 134 and 135 have been grouped.

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

Question 135: Please provide your reasons, particularly if you disagree.

A total of 754 respondents answered Question 134 and 135. Of those answering Question 134,15% strongly agreed, 27% partly agreed, 25% neither agreed nor disagreed, 9% partly disagreed, and 24% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

There was broad support for setting expectations regarding compensatory improvements when land is removed from the Green Belt, and recognising the wide range of benefits which Green Belt land can offer. However, some respondents raised concerns about the clarity, deliverability and implementation of these requirements, particularly in relation to expectations on plans to identify and secure improvements. There were concerns about the risks associated with requiring plans to set out and deliver formal proposals for improved access which may be difficult to deliver, and uncertainty about how compensatory improvements should be secured.

The government has considered these responses and has made changes to the policy to clarify the expectations for development plans. The revised policy makes clear that development plans should identify opportunities for the Green Belt to contribute to benefits for communities and nature, including environmental quality, nature recovery and public access to green space.

The final sub-paragraph of the draft policy has been deleted, as the government considers that wider policy, including the Golden Rules, requirements for altering Green Belt boundaries, and policies on improving access, already provide an appropriate framework for securing compensatory improvements.

Responses for Questions 136 and 145 have been grouped.

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

A total of 1,173 respondents answered Question 136. Of those, 10% strongly agreed, 17% partly agreed, 12% neither agreed nor disagreed, 11% partly disagreed, and 50% strongly disagreed. This indicates strong opposition to the proposal.

Question 145: Do you agree that proposed changes to the grey belt definition will improve the operability of the grey belt definition, without undermining the general protections given to other footnote 7 areas?

A total of 996 respondents answered Question 145. Of those, 15% strongly agreed, 10% partly agreed, 16% neither agreed nor disagreed, 6% partly disagreed, and 53% strongly disagreed. This indicates strong opposition to the proposal.

Government response

Respondents often referred to the December 2024 changes introducing grey belt, with some raising concerns that these reforms weaken Green Belt protections and calling for stronger safeguards, including a blanket restriction on development. Others raised concerns about changes to the grey belt definition, particularly the removal of explicit cross-reference to ‘footnote 7’ areas (i.e. those areas named in footnote 7 of the existing NPPF). In contrast, some respondents considered that footnote 7 areas are already protected through separate policies and that simplifying the definition would improve operability.

There were also requests for additional clarity on exemptions in policy GB7. In particular, respondents sought assurance that appropriate forms of development remain supported, including nature recovery, minerals development, and infrastructure.

The government remains committed to the ongoing protection of the Green Belt. The reforms introduced in the December 2024 Framework recognise that, in some areas, brownfield land alone will not be sufficient to meet development needs. As such, these reforms direct development towards lower quality grey belt land and require the delivery of public benefits. Following careful consideration of the responses received, the government is satisfied that separate policy protection for footnote 7 areas remain in place and does not consider that substantial changes to the grey belt approach are necessary. The government is therefore proceeding with the definition of grey belt as consulted on.

In response to concerns about exemptions, the government has made targeted amendments to policy GB7. These changes ensure that nature recovery projects are clearly supported, clarify that existing allowances for mineral extraction include mineral processing, and confirm that necessary infrastructure in the Green Belt includes telecommunications alongside transport, water and electricity infrastructure. Other minor changes have been made to make clear that existing buildings proposed for development should be lawful in planning terms, to align the drafting style with policy S5, to reflect the new glossary definition of ‘well-connected stations’ and to improve the clarity of the wording.

Overall, the government considers that these amendments improve clarity and operability while maintaining strong protections for the Green Belt.

Responses for Questions 133, 137 and 138 have been grouped.

Question 133: Do you agree with proposals to better enable development opportunities around suitable stations to be brought forward?

A total of 1,162 respondents answered Question 133. Of those, 15% strongly agreed, 13% partly agreed, 12% neither agreed or disagreed, 7% partly disagreed, and 52% strongly disagreed. This indicates strong opposition to the proposal.

Question 137: Do you agree policy GB7(1)(h) successfully targets appropriate development types and locations in the Green Belt, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12?

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

A total of 844 respondents answered Questions 137 and 138. Of those, 10% strongly agreed, 21% partly agreed, 21% neither agreed nor disagreed, 11% partly disagreed, and 38% strongly disagreed. This indicates strong opposition to the proposal.

Government response

Many respondents, particularly individuals responding in a personal capacity, raised concerns that these changes could result in a weakening of Green Belt protections, such as contributing to urban sprawl and the loss of openness.

Views among other respondent groups were more mixed. Developers and professional bodies showed strong support for the proposals, noting that development on Green Belt land around well-connected stations would support sustainable patterns of growth and make better use of locations with strong public transport links.

Local authorities expressed a wider range of views. While some supported the proposal in principle, a number raised concerns that key policy definitions lacked clarity. Some respondents sought further explanation of the term “reasonable walking distance”, while others requested greater clarity on the types of station policy GB3 would apply to.

The government has carefully considered these concerns and has made a number of clarifications to improve the operation of the policy. In response to requests for greater clarity, the Framework glossary defines a “reasonable walking distance” as 800 metres or approximately 10 minutes’ walking time. The definition also recognises that local circumstances may affect the practicality of walking this distance, including where physical barriers or other constraints discourage pedestrian access.

The government has also clarified that the stations referred to in policy GB3 are those identified in the relevant spatial strategy under policy S2. These changes are intended to provide greater certainty for applicants and decision-makers, while supporting the effective implementation of the policy.

The government is satisfied that these changes respond to key concerns raised in the consultation, and has decided to proceed with the proposal, subject to the clarifications set out above.

Question 139: Do you agree that site-specific viability assessment should be permitted on development proposals subject to the Golden Rules in these three circumstances?

A total of 807 respondents answered Question 139. Of those, 16% strongly agreed, 14% partly agreed, 23% neither agreed nor disagreed, 8% partly disagreed and 39% strongly disagreed. This indicates broad opposition to the policy.

Government response

A clear majority of respondents did not support any development in the Green Belt, raising concerns that allowing site-specific viability assessments could erode existing safeguards, weaken established policy protections and undermine confidence in the planning system. Concerns focused on the potential impact on the delivery of affordable housing and infrastructure, as well as the need for transparency and a clearly defined role for viability assessments.

While some respondents recognised that viability issues may arise, there was broad support for ensuring that any use of site-specific viability assessments remains tightly controlled and justified. Some respondents also called for a less narrow list of circumstances in which a viability assessment may be submitted.

The government has considered these responses and remains committed to a plan-led approach that ensures viability considerations do not undermine Green Belt policy objectives or the delivery of wider planning benefits. The government remains committed to ensuring that development on land within or released from the Green Belt delivers increased tangible benefits for communities reflecting its particular value to the public – including higher levels of social and affordable housing, green space and necessary infrastructure improvements.

To protect these benefits, the government is retaining the approach to limit the use of site-specific viability assessments to three limited circumstances. This is an intentionally narrower set of circumstances than those which may occur on schemes which are not subject to the Golden Rules, and revisions have been made to policy GB8(3) to further reflect this approach. This includes making clear that viability assessments submitted on previously developed land should demonstrate how costs associated with that previous development make the scheme unviable; strategic sites should meet the new glossary definition; and retaining the use of “wholly” in policy GB8(3)(c) in comparison to “materially” at policy DM5(2)(a) to reflect the status of Green Belt land and the importance of maintaining the integrity of the Golden Rules.

In addition, where site-specific viability assessments are submitted, new wording has been added to confirm that development proposals which provide contributions significantly below affordable housing requirements under the Golden Rules will only be acceptable in exceptional cases where fully evidenced and justified (see response to Questions 141 and 142).

The government has also refined GB8(2) to aid understanding of the policy intent.

Question 140: With regards to previously developed land, are there further changes to policy or guidance that could be made to help ensure site-specific viability assessments are used only for genuinely previously developed land, and not predominantly greenfield sites?

A total of 420 respondents answered Question 140.

Government response

Views were mixed, but respondents generally sought greater certainty in national policy and stronger safeguards to ensure that viability considerations are applied only where genuinely justified.

There was support for retaining flexibility to address costs associated with previous uses in appropriate cases. However, a number of respondents raised concerns about the potential for inconsistent application and emphasised the need for clearer policy, stronger evidence requirements and greater transparency. Respondents also highlighted the importance of distinguishing between previously developed land and greenfield land to ensure that viability assessments are used only in circumstances that warrant an exception to normal policy expectations.

The government has considered these responses and has amended policy GB8 to strengthen the wording relating to previously developed land, requiring sites to meet both the Framework definition of previously developed land and be demonstrably burdened by costs associated with that previous development which were not considered at the plan-making stage.

The government has retained the provision relating to schemes that are wholly different to the types of development considered through plan-making. However, we will update Planning Practice Guidance to support local planning authorities in considering a wide range of development types at the plan-making stage, helping to minimise the need for site-specific viability assessment while retaining appropriate flexibility where justified.

Responses for Questions 141 and 142 have been grouped.

Question 141: Do you agree with setting an affordable housing ‘floor’ for schemes subject to the Golden Rules accompanied by a viability assessment subject to the terms set out?

Question 142: Please explain your answer, including your view on the appropriate approach to setting a ‘floor’, and the right level for this?

A total of 609 respondents answered Question 141 and 142. Of those answering Question 141, 22% strongly agreed, 20% partly agreed, 33% neither agreed nor disagreed, 7% partly disagreed and 19% strongly disagreed. This indicates mixed views, with a significant proportion of neutral responses.

Government response

There were differing views on whether an affordable housing floor would provide greater certainty and protection for affordable housing delivery or reduce the flexibility needed to respond to local circumstances.

Respondents who supported the proposal considered that an affordable housing floor could help safeguard the delivery of affordable housing where viability considerations are raised. However, a number of respondents raised concerns about the practicality and effectiveness of introducing either a nationally or locally set minimum requirement. Concerns focused on the potential lack of flexibility to reflect variations in viability across different areas, and the risk that locally determined floors would duplicate existing plan-making processes, where affordable housing requirements are already tested and established through local plans.

The government has considered these responses and does not intend to introduce either a nationally set or locally set affordable housing floor. The government considers that the absence of a clear consensus, together with concerns regarding flexibility and duplication, means that a fixed minimum requirement would not operate effectively within the existing plan-led system.

In response, the government has amended policy GB8(4) to clarify how decision-makers should consider proposals that seek to reduce affordable housing provision significantly below the Golden Rules requirements. The revised policy makes clear that such proposals will only be acceptable in exceptional cases where fully evidenced and justified.

Responses for Questions 143 and 144 have been grouped.

Question 143: Do you agree with local planning authorities testing viability at the plan-making stage using a standardised Benchmark Land Values scenario of 10 times Existing Use Value for greenfield, Green Belt land?

A total of 579 respondents answered Question 143. Of those, 10% strongly agreed, 15% partly agreed, 35% neither agreed nor disagreed, 10% partly disagreed and 30% strongly disagreed. This indicates strong opposition to the proposal, with a significant proportion of neutral responses.

Question 144: Do you have any other comments on the use of nationally standardised Benchmark Land Values for local planning authorities to test viability at the plan-making stage?

A total of 351 respondents answered Question 144.

Government response

While some respondents considered that a standardised approach to Benchmark Land Values could improve transparency and help establish clearer expectations regarding land values, many expressed concerns about the use of a nationally set multiplier based on Existing Use Value. Concerns focused on the appropriateness of applying a standardised approach across different markets and development contexts, and the potential implications for viability. These concerns were reflected in responses to Question 144, which reinforced reservations about the use of nationally standardised Benchmark Land Values at the plan-making stage.

The government has considered these responses and does not intend to require local planning authorities to test plan viability using a standardised Benchmark Land Value scenario of 10 times Existing Use Value for greenfield Green Belt land. While such an approach could provide greater transparency, the balance of responses indicates that the risks associated with a nationally prescribed multiplier outweigh the potential benefits. Instead, the government will continue to rely on locally evidenced viability testing undertaken through the plan-making process, allowing land value assumptions to reflect local circumstances. The government will also work with the Planning Advisory Service to ensure that training and resources are available to support local planning authorities in viability assessment.

We are maintaining the strengthened policy approach set out elsewhere in the Framework, including policy HO5, to support the delivery of higher affordable housing requirements on Green Belt and released land. This will be supported by universal plan coverage and locally evidenced viability assessments. This approach provides flexibility to reflect local conditions while maintaining a clear expectation that development should contribute appropriately to affordable housing delivery.

Chapter 14 – Achieving well-designed places

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

A total of 741 respondents answered Question 146. Of those, 29% strongly agreed, 31% partly agreed, 22% neither agreed nor disagreed, 11% partly disagreed and 7% strongly disagreed. This indicates broad support for the proposal.

Government response

Respondents welcomed the clear link between design and placemaking outcomes, and a vision set through the development plan. They supported allowing local planning authorities discretion to determine which areas and locally specific issues should be addressed by different design tools. Some respondents sought greater clarity to support implementation, including on the design matters to be covered, the relationship between national policy and local issues, the process for developing and applying design tools, and the appropriate spatial scales for different tools. Concerns were also raised about local planning authorities' resources and potential burdens on applicants, the implications for development coming forward, and the need to reflect community engagement in national policy.

The government has considered these responses and is taking forward policy DP1 with some amendments. To support understanding and implementation, the government has amended policy DP1 to refer more clearly to Design and Placemaking Planning Practice Guidance. We are adding a separate paragraph so that the reference to guidance applies to the whole policy rather than only to policy DP1(1)(d). The government has also amended policy DP1(1)(a) to refer to proactive engagement with communities and other interests when developing a vision for design and placemaking. In addition, the government has also added reference to “high-quality” places in the introduction to the chapter, in place of “well-designed”, to address concerns that reference to quality as an objective had been lost.

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

A total of 707 respondents answered Question 147. Of those, 29% strongly agreed, 37% partly agreed, 22% neither agreed nor disagreed, 8% partly disagreed and 4% strongly disagreed. This indicates strong support for the proposal.

Government response

Respondents generally welcomed the greater flexibility created by moving away from mandatory authority-wide design codes. Support was particularly strong among local authorities, who valued the emphasis on understanding local character and context, producing design tools with proportionate detail, and monitoring and review. At the same time, respondents highlighted resource and capacity constraints and sought clearer guidance on when particular design tools are expected.

The government has considered these responses and is taking forward policy DP2 with an amendment to support implementation. The government will publish the final Design and Placemaking Planning Practice Guidance in the autumn. This will provide practical advice on creating high-quality places and on the use of design tools. The government also intends to publish a series of Model Design Codes. These will be standard design codes for common development types, such as large housebuilder-led sites and small urban sites, to help local planning authorities save time and resources by avoiding the need to create local design codes for repeatable development types. The government has added reference to Model Design Codes and their intended purpose in policy DP2.

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

A total of 817 respondents answered Question 148. Of those, 24% strongly agreed, 41% partly agreed, 18% neither agreed nor disagreed, 10% partly disagreed and 7% strongly disagreed. This indicates broad support for the proposal.

Government response

Respondents welcomed the clearer list of principles for well-designed places and the publication of the draft Design and Placemaking Planning Practice Guidance. However, some local authorities, developers and respondents in the 'other' category found the structure of policy DP3(1) unclear and sought closer alignment between the policy and the draft guidance, particularly on context. Respondents called for stronger design policy in several areas, including explicit recognition of the safety of women and girls in public spaces. There was support from local authorities for retaining the principle in policy DP3(2) that development which is not well designed should be refused, but some respondents, particularly developers, were concerned about how the policy would operate in decision-making and whether proposals could be refused for failing to meet every principle in policy DP3(1).

The government has considered these responses and is taking forward policy DP3 with amendments. For greater clarity we have aligned the policy more closely with the Design and Placemaking Planning Practice Guidance by moving context into the opening paragraph of the policy so that it operates as an overarching principle. The government has also amended policy DP3(2)(f) to recognise the importance of supporting the safety of women and girls in public spaces and the role of lighting in contributing to safe spaces. In addition, the government has made changes to ensure that policy operates effectively in decision-making. It now makes clear that development proposals should reflect relevant aspects of the principles which are listed, as appropriate to the nature of the development and its location. In addition, paragraph 3 – which deals with reasons for refusal – has also been amended to reflect this change and to recognise that there may be circumstances in which a departure from the principles may be permissible if there is a clear justification. Both of these changes have been made in recognition of the breadth of policy DP3, which means that not all aspects of its principles can necessarily be applied to every development proposal.

Question 149: Do you agree with the proposed approach to using design review and other design processes in policy DP4? a) If not, what else would help secure better design and placemaking outcomes?

A total of 709 respondents answered Question 149. Of those, 27% strongly agreed, 35% partly agreed, 24% neither agreed nor disagreed, 8% partly disagreed and 6% strongly disagreed. This indicates broad support for the proposal.

Government response

Supportive responses highlighted design review as a means of strengthening design scrutiny and improving design outcomes. Respondents also supported stronger policy protection against the quality of approved development being materially diminished between permission and completion. Concerns focused on proportionality, local authority capacity, impacts on viability, the quality of design review panels and the weight to be given to design review in decision-making. Respondents also sought greater clarity on how and when design review should be used in practice. A number opposed the removal of paragraph 141 in the current NPPF on advertising controls.

The government has considered these responses and is taking forward policy DP4 as consulted on with a minor amendment to reflect the new definition of strategic sites. The government considers that the policy provides an appropriate framework for the use of design review and related processes, and for supporting design quality through the planning process, including between permission and completion.

The government notes the concerns about removing paragraph 141 on advertising controls. This text was removed because it repeated matters already set out in legislation; however, we recognise that the policy in paragraph 141 asked decision makers to consider cumulative impacts, which is in addition to the requirements set out in the Advertisement Regulations. As such, we can confirm we will update relevant Planning Practice Guidance to ask that decision makers take cumulative impacts into account when determining applications for advertisement consent.

Chapter 15 – Promoting sustainable transport

Question 150: Do you agree that policy TR1 will provide an effective basis for taking a vision-led approach and supporting sustainable transport through plan-making?

A total of 766 respondents answered Question 150. Of those, 23% strongly agreed, 40% partly agreed, 19% neither agreed nor disagreed, 10% partly disagreed and 8% strongly disagreed. This indicates broad support for the proposal.

Government response

Respondents supported the additional detail on joined-up and early engagement in plan-making, and the continued application of the vision-led approach to transport planning. However, some raised questions about the use of the government's Connectivity Tool, including how it would align with Transport for London's Public Transport Access Level metric. There were also concerns about when the 'vision' should be formulated, and about the practicalities of local authorities setting thresholds for what constitutes a 'significant amount of movement'. Other points made included the types of transport facility which need to be planned for in different areas, and whether the definition of 'sustainable transport modes' set out in the glossary was too wide and could hinder efforts to prioritise walking, wheeling, cycling and public transport use.

The government has considered these responses and notes the broad support for taking forward a vision-led approach to plan-making. To support consistent application, the government will revise national planning practice guidance on transport to provide further information on the vision-led approach and to address points raised in consultation. This will include clarification on when the vision should be established and how authorities may set local thresholds for significant movement.

The government has also clarified the policy to make clear that both quantitative and qualitative evidence can be used in assessing and selecting sites, in addition to the Connectivity Tool. In addition, the government has included electric vehicle charging facilities and bus and rail depots in the indicative list of transport facilities which may need to be planned for. In conjunction with the changes being made to the sustainable transport chapter, the government has also amended the definition of 'sustainable transport modes', removing reference to ultra low and zero emission vehicles and car sharing, so that it aligns more fully with what the government regards as sustainable transport. Consequential changes have been made to policies TR2(2) and CC2(1)(a), though not to other policies where 'sustainable transport modes' are cited (as we consider that the revised definition remains relevant in these cases).

Question 151: Do you agree that policy TR2 strikes an appropriate balance between supporting maximum parking standards where they can deliver planning benefits, and requiring a degree of flexibility and consideration of business requirements in setting those standards?

A total of 671 respondents answered Question 151. Of those, 21% strongly agreed, 35% partly agreed, 25% neither agreed nor disagreed, 12% partly disagreed and 8% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

Respondents recognised that parking standards are an effective mechanism to promote sustainable and active travel, particularly where they reflect the location and type of development. There was support for maximum standards to encourage a shift away from private car use, especially in well-connected areas, with some noting that effective enforcement would be important. However, concerns were raised about the degree of flexibility in applying standards, particularly in rural areas with lower levels of connectivity, where overly restrictive standards could lead to overspill parking and increased congestion.

The government has considered these responses and concludes that the policy should be taken forward with minor amendments. The government considers that the policy strikes an appropriate balance by requiring authorities to set local parking standards aligned with vision-led planning, while allowing flexibility through the use of ranges and consideration of local circumstances, including specific business needs. To support consistent application, further clarification will be provided in associated guidance to be published in due course, including how standards can be applied proportionately across different local contexts. A reference to encouraging shared transport has been added alongside sustainable transport modes as one of the potential benefits from maximum standards; this addition reflects the revised definition of ‘sustainable transport modes’ contained in the glossary as referenced in Q150, which no longer includes private vehicle modes of transport. In addition, and for accuracy, the term 'plug-in' vehicles has been replaced by 'electric' vehicles.

Question 152: Do you agree with the changes proposed in policy TR3(1)(a), including the reference to proposals which could generate a significant amount of movement, and the proposed use of the Connectivity Tool?

A total of 716 respondents answered Question 152. Of those, 22% strongly agreed, 35% partly agreed, 26% neither agreed nor disagreed, 9% partly disagreed and 9% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

Respondents generally supported the proposed changes as strengthening the priority given to sustainable locations, active travel and public transport. There was support in principle for policy TR3(1)(a), with the shift from “significant development” to “significant amount of movement” seen as a more useful way of identifying transport impacts. However, concerns were raised that the wording could be open to interpretation, with calls for clearer thresholds or criteria. Responses also focused on the proposed use of the Connectivity Tool in policy TR3(2), with some support but also concerns about how it would be applied, particularly in rural areas and alongside other tools.

The government has considered these responses and notes the general support for the policy changes. Clarifications have, however, been made to policy TR3(1)(a) in relation to the factors to be taken into account when determining the sustainability of locations for development. This includes recognising planned improvements and reinforcing that development should limit the need to travel, particularly by private car.

To reinforce the importance of developing in locations where there will not be an adverse transport impact, the government has also echoed wording from the previous Framework (paragraph 115(d) of the December 2024 NPPF), which forms a new sub-paragraph (c) to policy TR3(1).

The government has noted concerns about the application of the Connectivity Tool, particularly in rural contexts. As set out in response to Question 150, the government will update guidance to clarify how the tool should be used, including its application in different types of area. Additional reference has been made to 'quantitative and qualitative' evidence sources within paragraph 2 of the policy to make clear that a range of additional evidence may also be relevant in this context.

Question 153: Do you agree that proposed policy TR4 provides a sufficient basis for the effective integration of transport considerations in creating well-designed places?

A total of 690 respondents answered Question 153. Of those, 23% strongly agreed, 37% partly agreed, 24% neither agreed nor disagreed, 10% partly disagreed and 7% strongly disagreed. This indicates broad support for the proposal.

Government response

Respondents supported the principle of integrating transport considerations into the design of places, including the focus on active travel, inclusive design and early integration of movement and place. However, some considered the policy to be too high-level, with limited clarity on how to balance competing design requirements such as servicing, emergency access, parking and kerbside demands with high-quality public realm. There were also calls for clearer alignment between national guidance, local design codes and transport strategies, and more consistent, evidence-based requirements. Some respondents requested stronger reference to the needs of women and girls and other vulnerable groups in creating safe and inclusive places. Some retailers raised the need for flexibility when applying parking standards to sites which are being reconfigured, in order to balance the scope to make better use of land while maintaining a sufficient number of spaces needed for commercial purposes.

The government has considered these responses and is proceeding with the policy, recognising the support for a more integrated approach to transport and design, but with some adjustments. In response to points made about omissions, specific reference is now made to permeable street networks, alongside continuous footways and segregated cycle infrastructure, to support walking, cycling and legibility in new development. Explicit reference has also been made to the needs of women and girls and other vulnerable groups, in line with the Violence Against Women and Girls strategy, to ensure that streets and public spaces are designed to be safe, inclusive and accessible for all users.

In relation to parking, an addition has been made to clarify that flexibility may be needed to support commercial requirements, where retail sites are being reconfigured.

Responses for Questions 154, 156, and 157 have been grouped.

Question 154: Do you agree with policy TR5 as a basis for supporting the provision and retention of roadside facilities where there is an identified need?

A total of 541 respondents answered Question 154. Of those, 23% strongly agreed, 25% partly agreed, 41% neither agreed nor disagreed, 7% partly disagreed and 4% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Question 156: Do you agree the proposed text in policy TR7 provides an effective basis for assessing proposals for marine ports, airports and general aviation facilities?

A total of 540 respondents answered Question 156. Of those, 13% strongly agreed, 21% partly agreed, 49% neither agreed nor disagreed, 10% partly disagreed and 7% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Question 157: Do you agree with the additional policy on maintaining and improving rights of way proposed in policy TR8?

A total of 671 respondents answered Question 157. Of those, 46% strongly agreed, 26% partly agreed, 21% neither agreed nor disagreed, 5% partly disagreed and 3% strongly disagreed. This indicates strong support for the proposal.

Government response

Respondents sought greater clarity in policy TR5 on what would constitute identified need, who would determine the need for roadside facilities, and whether there would be benefit in identifying or safeguarding specific sites through plan-making. Some also argued that new facilities should be directed to brownfield rather than greenfield sites and noted that the policy should also recognise the need for EV charging facilities in urban areas.

Respondents also queried what would amount to an “acceptable environmental effect” in policy TR7(1e), alongside concern about how effectively the policy would mitigate negative environmental impacts where these arise. Some respondents welcomed the policy’s support for modernising and improving facilities, particularly in relation to aviation, while others argued that this did not sit easily with wider climate change objectives.

Respondents who supported policy TR8 commonly argued that the wording should be strengthened from “maintain” to “protect and enhance” the network of public rights of way, in line with paragraph 105 of the 2024 Framework. Some also said the policy should place greater emphasis on developer contributions through section 106 agreements to support improvements to public rights of way. Other responses linked the protection of public rights of way to wider environmental and nature considerations, noting that diversion or alteration can in some cases cause harm.

The government has considered the responses and is proceeding with proposed policies TR5, TR7 and TR8, making targeted amendments to improve clarity and strengthen the Framework.

For policy TR5, concerns that the wording could be open to interpretation and allow loss of roadside facilities without replacement have been addressed by amending the policy to refer to alternative provision “being provided” rather than “likely to be provided”. The government does not consider that further elaboration of what ‘need’ means in this context is necessary, given that it reflects phrasing elsewhere in the Framework, but will consider whether guidance is needed to support implementation. It will be for applicants in the first instance to demonstrate that a proposal would meet the tests specified in the policy.

For policy TR7, additional wording clarifies that proposals for marine ports, airports and other aviation development should take account of any applicable standards or policies relating to their environmental effects. Reference has also been added to promote the use of zero emission vehicles as part of such facilities, in line with their inclusion elsewhere in this chapter.

Policy TR8 has been strengthened to reflect the importance of public rights of way to active travel and community wellbeing, requiring development proposals to “protect and enhance” the network rather than simply ensure that they are “maintained”.

Question 155: Do you agree that the amended wording proposed in policy TR6 provides a clearer basis for considering when transport assessments and travel plans will be required, and for considering impacts on the transport network?

A total of 676 respondents answered Question 155. Of those, 23% strongly agreed, 25% partly agreed, 41% neither agreed nor disagreed, 7% partly disagreed and 4% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

Respondents generally welcomed the intention to clarify when transport assessments, statements and travel plans are required, and to broaden assessment beyond highway safety to include congestion, capacity, cumulative impacts and multimodal networks. However, many raised concerns that key terms – significant amounts of movement', 'severe adverse impact' and 'reasonable future scenarios' – lack clear definition and could lead to subjective and inconsistent application. Views were mixed on changes to policy TR6(3): some supported the revised wording as a positive approach to decision-making, while others favoured the previous 'should be refused' formulation for clarity.

The government has considered these responses and agrees that the policy provides an appropriate overall framework for assessing transport impacts. However, to address concerns about clarity and consistency, the government has made a number of amendments. The first is to make clear that the relevant transport strategy should be considered when preparing transport assessments/statements and travel plans. Second, a number of clarifications have been made to TR6(3), including the relevance of assessing movement patterns as well as impacts, assessing impacts at relevant times of the day, and referring to the consideration of 'reasonable future scenarios' (as opposed to 'all' such scenarios) to make sure that a proportionate approach is taken.

Third, TR6(4) has been amended to clarify that development proposals should be refused where they would result in a severe adverse impact on the transport network, in terms of capacity and congestion, or an unacceptable impact on highway safety, taking account of proposed mitigation and wider network improvements, including measures to support sustainable patterns of movement. It now also makes clear that the assessment of impacts should consider the construction phase as well as during planned operation. Further guidance will support consistent application of these tests.

Chapter 16 – Promoting healthy communities

Responses for Questions 158 and 160 have been grouped.

Question 158: Do you agree with the approach to planning for healthy communities in policy HC1, including the expectation that the development plan set local standards for different types of recreational land, drawing upon relevant national standards?

A total of 775 respondents answered Question 158. Of those, 35% strongly agreed, 32% partly agreed, 16% neither agreed nor disagreed, 10% partly disagreed and 7% strongly disagreed. This indicates strong support for the proposal.

Question 160: Do you agree that the proposed policies at HC3 and HC4 will support the provision of community facilities and public service infrastructure serving new development?

A total of 711 respondents answered Question 160. Of those, 28% strongly agreed, 38% partly agreed, 20% neither agreed nor disagreed, 9% partly disagreed and 5% strongly disagreed. This indicates strong support for the proposal.

Government response

Across both questions, respondents generally supported the proposals, recognising that the draft policies would help create healthy and inclusive places and encourage the provision of new or improved community facilities and public service infrastructure to support new developments.

However, some respondents raised concerns that the draft policies reduced the focus on tackling health inequalities and promoting public health benefits in developments, particularly in decision-making.

The government has considered the range of responses received in response to questions 158 and 160 and, given the strong support, is proceeding with the proposed approach.

In response to concerns raised, the policies have however been amended to strengthen the focus on health inequalities and public health outcomes. This includes changes to policy HC4 to give substantial weight to development proposals with demonstratable benefits in promoting good health, preventing-ill health, reducing health inequalities or supporting social interaction in the local community.

Several other minor drafting amendments have been made to the policies to improve the clarity and consistency of the drafting. This includes the removal of engagement with relevant service providers from policy HC1(1)(a) given it is already provided for at HC1(2).

In addition, the glossary definition of community facilities has been amended to include "cemeteries and burial grounds" to reflect concerns that the importance of these local assets had not been sufficiently recognised in the Framework.

Responses for Questions 159 and 164 have been grouped.

Question 159: Do you agree that Local Green Space should be close to the community it serves?

A total of 761 respondents answered Question 159. Of those, 56% strongly agreed, 24% partly agreed, 13% neither agreed nor disagreed, 4% partly disagreed and 4% strongly disagreed. This indicates strong support for the proposal.

Question 164: Do you agree with the clarification that Local Green Space should not fall into areas regarded as grey belt or where Green Belt policy on previously developed land apply?

A total of 631 respondents answered Question 164. Of those, 45% strongly agreed, 14% partly agreed, 24% neither agreed nor disagreed, 6% partly disagreed, 12% strongly disagreed. This indicates broad support for the proposal.

Government response

Broadly the proposals were supported, with respondents supportive of the clear protections for Local Green Space in decision-making. Some respondents requested clarity on how "close" could be defined. Some respondents, particularly in response to Question 164, were concerned that the policy could prevent locally significant spaces from being designated as Local Green Space where they are already within the Green Belt, grey belt, or previously developed land in the Green Belt. Others raised concerns that Local Green Space designation could be used to restrict development.

The government has considered these responses and, given the considerable support, will proceed with the policies as consulted on.

In relation to concerns about overlap with other designations, the government considers that the policy provides an appropriate balance between protecting genuinely important local spaces and ensuring consistency with wider Green Belt policy.

The government also reiterates that Local Green Space must be consistent with the wider approach to sustainable development in the area. Designations of Local Green Space are made through local and neighbourhood plans and are subject to independent examination, which provides an appropriate safeguard against their inappropriate use.

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

A total of 453 respondents answered Question 161.

Government response

In response to question 161, feedback indicated strong support for further clarity, particularly for the terms “fast food outlet” and “reasonable walking distance”, to ensure certainty and consistency in the application of the policy. Respondents highlighted that “fast food outlet” is not defined in the Use Classes Order and is not clearly distinguishable from other restaurant and café uses in planning terms, creating uncertainty and making the policy difficult to apply consistently.

The government has considered these responses and agrees that greater clarity is required to support effective implementation of policy HC5. In response, a glossary definition for “reasonable walking distance” has been introduced to clarify that, in the context of HC5, it should be considered to be around 400 metres, or around five minutes’ walk, unless topography, route availability and quality or physical barriers would prevent or discourage walking up to that distance.

The government has carefully considered feedback that the term ‘fast food outlet’ creates uncertainty and is difficult to apply consistently in planning terms, and has therefore decided to remove this reference from the policy. The government remains committed to tackling childhood obesity, as set out in our 10 Year Health Plan for England. We will explore whether other land use planning approaches, including changes to the Use Classes Order, could be made to address issues associated with the operability of the term ‘fast food outlet’.

Responses for Questions 162 and 163 have been grouped.

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

A total of 663 respondents answered Question 162. Of those, 33% strongly agreed, 24% partly agreed, 20% neither agreed nor disagreed, 12% partly disagreed and 12% strongly disagreed. This indicates broad support for the proposal.

Question 163: Do you agree with the approach taken to recreational facilities in policy HC7, including the addition of ‘and/or’ with reference to quantity and quality of replacement provision?

A total of 645 respondents answered Question 163. Of those, 29% strongly agreed, 24% partly agreed, 23% neither agreed nor disagreed, 11% partly disagreed and 12% strongly disagreed. This indicates broad support for the proposal.

Government response

In response to Question 162, respondents broadly supported the approach in policy HC6 to retaining key community facilities and public service infrastructure. However, considerable concern was raised that paragraph 2 of the proposed policy – which applied the policy “only where the facility would be the last of its type in the area concerned” – could inadvertently weaken protections for some community facilities where they are not the last of their type and lead to inconsistent application.

In response to Question 163, respondents generally supported the approach to recreational facilities in policy HC7 but raised concerns about the proposed change to allow replacement provision to be of equivalent or better quality ‘and/or’ quantity. In particular, respondents considered that this could result in the loss of playing fields where improvements in quality were used to justify a reduction in quantity and that in many circumstances this would not appropriately offset the impact of losing recreational land.

The government has considered these responses and, given the broad support, has decided to proceed with the policies with amendments to address the concerns raised.

In relation to policy HC6, the provision in paragraph HC6(2) has been revised. The previous wording limiting the policy to cases where the facility would be the last of its type has been removed and replaced with a new subparagraph HC6(1)(c), which allows the policy to be disapplied where decision-makers are satisfied that there is adequate alternative provision in the area. This means that all of the key facilities named in the policy now fall within scope of the broad protection which it offers, while also allowing a pragmatic and proportionate approach to be taken where a loss would not diminish access to key community facilities and public service infrastructure.

In relation to policy HC7, the government has reverted to the existing requirement that any loss should be replaced by provision of equivalent or better quality and quantity. At the same time a new subparagraph in policy HC7(1)(c) adds that a ‘quality and/or quantity’ approach will apply where the proposed development relates specifically to public service infrastructure, reflecting the need for flexibility where wider improvements to such infrastructure are needed.

Other minor drafting changes have been made to policies HC6 and HC7 to improve clarity and consistency.

Chapter 17 – Pollution, public protection and security

Question 165: Do you agree with policy P1 as a basis for identifying and addressing relevant risks when preparing plans?

A total of 609 respondents answered Question 165. Of those, 35% strongly agreed, 25% partly agreed, 27% neither agreed nor disagreed, 8% partly disagreed and 5% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

Respondents generally supported a clearer framework for addressing pollution, environmental risks and public safety through plan-making. However, many considered the requirement to identify areas affected by ground conditions to be too broad and resource intensive. Others called for the policy to cover a wider range of environmental and climate risks and to place greater emphasis on health and safety. There were also requests for proportionate evidence requirements and standardised risk assessment aligned with environmental assessments.

The government has considered these responses and made targeted refinements. The policy now acknowledges that plan-makers will need to consider cumulative impacts from a wider range of pollution sources during site allocation, and to address additional forms of pollution where these are locally important. Consideration of ground conditions has been brought into the site selection process rather than implying that ground conditions need to be assessed throughout the plan area.

These plan-making policies should be read alongside those on healthy communities, climate change and the natural environment in other chapters.

Question 166: Are any additional tools or guidance needed to enable better decision-making on contaminated land?

A total of 294 respondents answered Question 166.

Government response

Views were mixed on the need for additional guidance. Many respondents supported the introduction of further guidance and tools to aid implementation, while others considered existing frameworks broadly sufficient and emphasised the need for better coordination and application rather than new tools.

Respondents highlighted the need for greater consistency and clarity across the land contamination process, particularly in relation to evidence requirements, assessment methodologies and expectations at different stages of decision-making. Some also suggested guidance could better address emerging issues, including climate change impacts and nature-based remediation approaches.

The government has considered these responses and has made minor amendments to the text in response, but will also reflect this feedback in future guidance, including opportunities to support greater consistency and standardisation in assessing risks arising from ground conditions.

Question 167: Do you agree with the criteria set out in proposed policy P3 as a basis for securing acceptable living conditions and managing pollution?

A total of 658 respondents answered Question 167. Of those, 21% strongly agreed, 28% partly agreed, 13% neither agreed nor disagreed, 17% partly disagreed and 21% strongly disagreed. This indicates broad support for the proposal.

Government response

Respondents supported the principle of policy P3 but raised concerns that it placed too much emphasis on mitigation rather than avoiding harm. Some considered that the removal of existing wording on noise could weaken environmental protections. There were also calls for greater clarity on how pollution criteria and thresholds should be applied in practice, while allowing decisions to reflect local circumstances. Respondents emphasised the importance of proportionality and deliverability and highlighted potential ambiguity in how policy P3 interacts with policy DM7 and the role of other regulatory regimes in decision-making.

The government has considered these responses and agrees that the policy should more clearly prioritise the avoidance of harm. It has therefore redrafted it to make it clearer and more concise, with greater emphasis on avoidance and the restoration of key wording relating to noise. In addition, paragraph P3(2)(c) of the policy has been amended to set out more fully the various clean air designations, plans and strategies which should be taken into account.

In response to concerns about overlap with other policies and regimes, the government has clarified that, while decision-makers should assume that other regulatory regimes will operate effectively, relevant matters may still be material to decisions about land use. This is intended to improve consistency and reduce ambiguity in the relationship between policies P3 and DM7.

Question 168: Do you agree policy P4 makes sufficiently clear how decision-makers should apply the agent of change principle?

A total of 591 respondents answered Question 168. Of those, 38% strongly agreed, 21% partly agreed, 30% neither agreed nor disagreed, 6% partly disagreed and 4% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

Respondents broadly welcomed the retention of the agent of change principle and the additional clarity provided through policy P4. Many suggested that the policy should recognise a wider range of existing uses and infrastructure that may affect new development. Others called for clearer expectations about mitigation measures and how these are secured, monitored and enforced. Respondents also highlighted the need for greater clarity to support consistent implementation, including how to assess current and permitted levels of activity and what constitutes an unreasonable restriction on an existing use.

The government has considered these responses and agrees that further clarity is needed to support consistent application of the policy. As a result, the policy itself has been amended to include the term ‘lawful’ to make clear that uses operating outside legal limits should not establish a baseline for assessment. This responds directly to concerns about how existing activity is defined and assessed. In addition, the government will publish updated guidance to ensure the policy is applied effectively and consistently.

Question 169: Do you agree policy P5 provides sufficient basis for addressing possible malicious threats and other hazards when considering development proposals?

A total of 532 respondents answered Question 169. Of those, 32% strongly agreed, 22% partly agreed, 35% neither agreed nor disagreed, 5% partly disagreed and 6% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

Most respondents considered that the expanded policy provides helpful clarification, although some raised concerns about implementation. A key theme was the need for effective engagement with relevant bodies and alignment with other regulatory regimes to avoid duplication. Respondents also emphasised that assessment and implementation should be proportionate to the scale and nature of development. Many highlighted the importance of explicitly considering the safety of women and girls, while others emphasised the need to ensure that security measures are balanced with wider objectives such as good design, sustainable transport, landscape and environmental quality.

The government has considered these responses and agrees that some of these points should be reflected in the policy. The policy has been amended to make clear the importance of considering the safety of women and girls when addressing crime and the fear of crime. Supporting footnotes have also been updated to improve accuracy regarding relevant consultation bodies, responding to concerns about engagement and alignment.

The policy has also been re-ordered, with the former paragraph (1)(d) being moved up so that issues concerning occupiers and users are now presented together in paragraphs (1)(a) and (b).

The government expects a proportionate approach to both the scale and nature of an assessment as well as implementation. This policy should be applied in line with the wider policies in the Framework, which ensure that safety and security considerations are balanced alongside context, liveability, nature and local character.

Question 170: Do you agree that substantial weight should be given to the benefits of development for defence and public protection purposes?

A total of 501 respondents answered Question 170. Of those, 35% strongly agreed, 20% partly agreed, 38% neither agreed nor disagreed, 5% partly disagreed and 3% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

Respondents supported giving substantial weight to development for defence and public protection purposes. However, many emphasised the need for a balanced approach that does not override other planning considerations, including design quality, environmental protection and amenity.

A recurring theme was the need for greater clarity on the scope of the policy, with concerns that the definition of relevant development, especially for public protection, could be widely interpreted. Respondents also supported the link to the agent of change principle to help manage potential conflicts with neighbouring uses.

The government has considered these responses and agrees that it is appropriate to give substantial weight to development for defence and public protection. However, this does not disapply other safeguards in the Framework, and proposals must continue to be assessed against wider planning considerations.

To address concerns about scope, the policy has been amended to include examples of the types of development that fall within its remit. This provides greater clarity while allowing flexibility to capture a range of development that may be critical for public protection. The government recognises the importance of the agent of change principle in managing potential conflicts and expects it to be applied alongside this policy.

Chapter 18 – Managing flood risk and coastal change

Responses for Questions 171, 176 and 177 have been grouped.

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

A total of 523 respondents answered Question 171. Of those, 28% strongly agreed, 20% partly agreed, 45% neither agreed nor disagreed, 4% partly disagreed and 4% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Question 176: Do you agree with the proposed changes to policy for managing development in areas affected by coastal change?

A total of 496 respondents answered Question 176. Of those, 28% strongly agreed, 18% partly agreed, 46% neither agreed nor disagreed, 3% partly disagreed and 4% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

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

A total of 228 respondents answered Question 177.

Government response

Across Questions 171 and 176, respondents generally supported the proposed approaches to identifying and considering Coastal Change Management Areas (CCMAs) and managing development within areas affected by coastal change. Support was strongest among professional bodies, interest groups and local authorities, while individuals, developers and neighbourhood planning bodies expressed more mixed but still broadly supportive views.

Respondents emphasised the need for nationally consistent, evidence-led risk assessments, clear guidance, and long-term planning using climate projections. Some questioned the reliability of national modelling and whether it should be supplemented with local evidence, particularly when considering coastal change over the 100-year timeframe. Respondents also supported the approach to safeguarding land for adaptation, managed realignment and risk management, as well as the use of time-limited permissions, adaptive re-use and resilient design, provided there is clear supporting guidance.

Many highlighted the importance of emphasising environmental protection in coastal change policy, including biodiversity, habitats, natural landscapes and heritage, and similarly prioritising nature-based solutions, recovery strategies and net gain goals. Some also felt that marine, mineral and infrastructure planning should be aligned with coastal change planning.

Concerns focused on a perceived weakening of flood risk protections, limited guidance and the risk of inappropriate development, with general agreement that permanent residential development should be heavily restricted in CCMAs and other high-risk areas. However, some respondents felt that a total restriction would not be appropriate and that there is a need for some flexibility depending on local circumstances.

In relation to Question 177, responses highlighted a clear tension between proportionate, context-sensitive approaches and precautionary approaches based on high-risk scenarios. Respondents also raised concerns about the reliability of national datasets such as the National Coastal Erosion Risk Map (NCERM) and the deliverability of measures in Shoreline Management Plans, calling for improved data, regular updates and greater use of local evidence and engagement. A smaller proportion emphasised environmental protection, and a limited number highlighted the need to prioritise vulnerable groups and ensure residents and users are aware of risks arising from coastal change.

The government has considered these responses and is retaining the overall direction of the proposals. In response to concerns about clarity and consistency, policy F3 has been amended to refer to ‘coastal change’ rather than ‘coastal erosion’, ensuring it reflects risks from both erosion and permanent inundation and aligns with the wider policy framework.

The government recognises the tension between proportionate and precautionary approaches and has ensured that policy F9 retains flexibility for decision-makers to take account of the type, lifetime and vulnerability of development, while enabling stronger safeguards when justified by risk. In response to concerns about evidence and flexibility, and to allow for the incorporation of local evidence where appropriate, policy F9(1) has been revised to broaden the range of evidence that can be used to assess whether proposals fall within areas likely to be subject to coastal erosion or tidal inundation, rather than relying solely on the national coastal erosion risk map.

Paragraph F9(2) has been split to create a new paragraph F9(3). The latter clarifies that the strict tests set out in policy F9(1) should be satisfied if new residential development is proposed in CCMAs or in areas likely to be subject to coastal erosion or tidal inundation, while dropping the previous reference to ‘permanent’ development. This maintains safeguards while avoiding unintended constraints on coastal communities. References to the character of the coast and the creation and maintenance of the continuous coastal path have been moved to policy N5, to ensure that these principles apply to the entire coast and not just within CCMAs.

The government also acknowledges calls for clearer guidance, particularly on evidence requirements, risk communication and community engagement, and will consider how supporting guidance can provide further clarity in these areas. The government recognises that environmental protection, nature-based solutions and alignment with wider adaptation strategies are important considerations in planning, however these are addressed elsewhere in the NPPF and so no further changes are proposed to coastal change policies in this respect.

Responses for Questions 172 and 173 have been grouped.

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

A total of 665 respondents answered Question 172. Of those, 26% strongly agreed, 27% partly agreed, 25% neither agreed nor disagreed, 14% partly disagreed and 10% strongly disagreed. This indicates broad support for the proposal, with a significant portion of neutral responses.

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

A total of 611 respondents answered Question 173. Of those, 29% strongly agreed, 22% partly agreed, 28% neither agreed nor disagreed, 12% partly disagreed and 10% strongly disagreed. This indicates broad support for the proposal, with a significant portion of neutral responses.

Government response

Across both questions, respondents generally supported a clearer and more proportionate approach to applying the sequential and exception tests. Support was strongest among local planning authorities and developers, while views from individuals, interest groups, professional bodies and neighbourhood planning bodies were more mixed but remained broadly supportive.

Respondents welcomed clearer definitions and improved consistency but raised concerns about ambiguity of some terms. Views diverged on flexibility. Some supported proportionate flexibility, including exemptions for minor development, brownfield and regeneration sites, and essential infrastructure. Others were concerned this could weaken safeguards and emphasised that the tests should be strict risk-avoidance gateways, and that assessments should be carried out where circumstances or evidence about a site or development change.

Respondents also called for clearer treatment of climate change, cumulative and downstream impacts, and all sources of flood risk, including concerns that surface water risk could be misinterpreted as wholly exempt from the sequential test. Less common points raised included local planning authority and statutory consultee resourcing pressures, the role of community evidence, long-term insurability, and the importance of nature-based solutions and floodplain protection.

The government has considered these responses and is retaining policies F5 and F6 as consulted on. The government considers that, when read alongside the wider Framework and supporting guidance, these policies can be applied consistently and strike an appropriate balance between proportionate flexibility and maintaining necessary safeguards for risk-based decision-making.

In response to concerns about surface water, the government's position is clear that it is not exempt from the sequential test altogether. Only sites at risk solely from surface water flooding may be exempt, and this is only where a site-specific flood risk assessment demonstrates that the proposed layout, design and mitigation will ensure safety over the development's lifetime without increasing risk elsewhere.

The government has also considered concerns raised in relation to policy F4 regarding site-specific flood risk assessments. While retaining the overall approach, changes have been made to be clearer that assessments are required for any site which has been identified at risk of flooding, and to remove the reference to situations where a more vulnerable use would be introduced. This change has been made to avoid inconsistencies in the types of development which may be required to prepare an assessment, and to make sure that assessments are prepared in all situations where a risk has been identified.

Responses for Questions 174 and 175 have been grouped.

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

A total of 710 respondents answered Question 174. Of those, 45% strongly agreed, 26% partly agreed, 18% neither agreed nor disagreed, 7% partly disagreed and 4% strongly disagreed. This indicates strong support for the proposal.

Question 175: Do you agree with the proposed new policy to avoid the enclosure of watercourses, and encourage the de-culverting and re-naturalisation of river channels?

A total of 671 respondents answered Question 175. Of those, 58% strongly agreed, 19% partly agreed, 18% neither agreed nor disagreed, 3% partly disagreed and 3% strongly disagreed. This indicates strong support for the proposal.

Government response

Across both questions, respondents supported the proposed sustainable drainage system (SuDS) delivery and design requirements and the preventative approach to the enclosure of watercourses in policy F8. Support was strongest among local planning authorities, professional bodies, and interest groups, with developers, individuals and neighbourhood planning bodies expressing more mixed but still generally supportive views.

Respondents supported the multi-functional and nature-based benefits of SuDS, including for water quality, biodiversity, climate resilience and amenity, and broadly supported alignment with national standards to improve consistency, while emphasising that effective implementation would depend on clear guidance, proportionate application, and allowance for site-specific constraints.

Many called for stronger mechanisms to secure delivery of SuDS, including mandatory adoption and long-term maintenance arrangements. Some therefore advocated implementing Schedule 3 of the Flood and Water Management Act 2010.

There was also strong support for de-culverting and re-naturalising watercourses to deliver a range of environmental and flood risk benefits, although some concerns were raised about the need for clear definitions, robust enforcement and flexibility to allow justified exceptions where necessary.

The government has considered these responses and is retaining the overall direction of the policy. However, an amendment has been made to include ‘harm to heritage assets’ as a consideration in policy F8(3) when determining whether removing an existing culvert is appropriate. This responds to concerns about ensuring a balanced and proportionate approach where there are site-specific constraints. The policy will continue to allow justified exceptions when supported by evidence and the mitigation hierarchy. The government recognises the importance of clear implementation and will consider how Planning Practice Guidance can support the applications of policy F8.

The government acknowledges calls for stronger arrangements for the adoption and maintenance of SuDS, but considers that the objectives of Schedule 3 of the Flood and Water Management Act 2010 may be more effectively secured through improvements to national planning policy and supporting guidance, alongside wider work on adoption and maintenance arrangements. A final decision on this will be made separately in due course.

The government also notes concerns regarding resourcing, water company roles, and water quality. These fall outside the scope of this policy, and so no further changes to this policy are proposed in response.

Question 178: Do you agree with the proposed new additions to Table 2: Flood Risk Vulnerability Classifications? a) Should any other forms of development should be added? Please give your reasoning and clearly identify which proposed or additional uses you are referring to.

A total of 544 respondents answered Question 178. Of those, 29% strongly agreed, 21% partly agreed, 38% neither agreed nor disagreed, 7% partly disagreed and 5% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

Respondents generally supported the proposed additions to Table 2 in Annex F on Flood Risk Vulnerability Classifications, particularly local planning authorities and professional bodies, with more mixed but still supportive views from other groups.

Respondents called for greater granularity in the types of development listed, to reduce ambiguity and better reflect specific and emerging infrastructure types. Views were mixed on whether certain development types, including data centres and renewable energy infrastructure, should be classified as essential, while others argued that additional types, such as care homes, hospitals, reservoirs, and heat networks should be included in the essential category.

Respondents also emphasised the importance of a precautionary approach, consideration of all sources of flood risk, and maintenance of up-to-date flood mapping. Some argued that, regardless of classification, no development should be permitted in functional floodplains.

A smaller number raised issues relating to coastal-specific development, pollution risks associated with flooded waste/sewage sites, the treatment of land raising, electricity-intensive infrastructure resilience, stronger expectations for nature-based solutions within design, and maintenance and emergency planning for essential infrastructure in flood-prone areas.

The government has considered these responses and is retaining the overall direction of the proposal, with a small number of targeted changes to Table 2. Telecommunications infrastructure has been moved from the highly vulnerable category into the essential infrastructure category. Water supply reservoirs, heat networks and electricity network infrastructure have also been added to the essential infrastructure category to reflect that they need to remain operational during flooding. Clarifications have also been made to the descriptions of some of the infrastructure types listed.

In response to calls for greater granularity, the government considers that the revised table, supported by guidance, strikes an appropriate balance between clarity and flexibility. The classification of data centres, wind turbines, solar panels and hydrogen infrastructure remains unchanged. The government does not propose to prohibit all development in functional floodplains, as this would rule out development with an essential need to be located there, and/or which is water-compatible. However, existing policy already requires a precautionary, risk-based approach, including consideration of all sources of flood risk and up-to-date evidence.

The government has noted wider points on emerging infrastructure, environmental risks, and resilience measures. Where appropriate, these will be considered through supporting guidance or related workstreams rather than further changes to vulnerability classifications.

Chapter 19 – Conserving and enhancing the natural environment

Responses for Questions 179 and 180 have been grouped.

Question 179: Do you agree that the proposed approach to planning for the natural environment in policy N1, including the proposed approach to biodiversity net gain, strikes the right balance between consistency, viability, deliverability, and supporting nature recovery?

A total of 992 respondents answered Question 179. Of those, 21% strongly agreed, 28% partly agreed, 13% neither agreed nor disagreed, 17% partly disagreed and 21% strongly disagreed. This indicates mixed views, with support and opposition broadly balanced.

Question 180: In what circumstances would it be reasonable to seek more than 10% biodiversity net gain on sites being allocated in the development plan, especially where this could support meeting biodiversity net gain obligations on other neighbouring sites in a particular area?

A total of 675 respondents answered Question 180.

Government response

Respondents generally supported elements of the proposals, particularly the introduction of references to Natural England's Green Infrastructure Standards and Local Nature Recovery Strategies. However, views were mixed, with many calling for stronger protections for the countryside, including agricultural land and non-designated areas, to safeguard food production and rural character. Concerns were also raised that aspects of the drafting weakened protections for vulnerable habitats and species, including through the removal of wording on mapping and safeguarding key sites. Respondents sought greater clarity on references to geology, features of environmental value such as chalk streams, and species of principal importance, and highlighted inconsistencies in how species are treated between plan-making and decision-making policies.

There were differing views on biodiversity net gain. Some respondents supported limiting local requirements above the statutory 10% minimum, citing impacts on cost, viability and consistency. Others argued this could constrain local ambition and reduce the effectiveness of Biodiversity Net Gain (BNG) in supporting wider nature recovery. Some respondents suggested that higher requirements may be appropriate where supported by local evidence, including through Local Nature Recovery Strategies, particularly on larger or strategically important sites and where this would support habitat connectivity and wider nature recovery.

The government has considered these responses and has retained the overall direction of policy N1. It remains clear that development plans should safeguard and enhance the natural environment, supported by relevant environmental evidence to guide development. Local Nature Recovery Strategies will play a central role in identifying and mapping areas of importance for nature and targeting action where it will deliver the greatest benefit. However, the government has made targeted amendments to improve clarity and consistency. References to species have been aligned with policy N2 and its glossary definition to broaden the scope of species considered. References to geology have been amended to 'geodiversity' to reflect its importance in habitat restoration.

A minor amendment has also been made to clarify that policy N1(2) applies to all locally set biodiversity net gain standards. BNG will continue to support nature recovery, but requirements above the statutory minimum should only be set where justified and deliverable on specific allocated sites. This approach is intended to provide greater consistency while allowing higher gains when supported by appropriate evidence. The government will provide guidance to support implementation, including on the evidence needed to justify higher requirements.

Question 181: Do you agree policy N2 sets sufficiently clear expectations for how development proposals should consider and enhance the existing natural characteristics of sites proposed for development?

A total of 1,094 respondents answered Question 181. Of those, 12% strongly agreed, 31% partly agreed, 18% neither agreed nor disagreed, 26% partly disagreed and 12% strongly disagreed. This indicates mixed views, with support and opposition broadly balanced.

Government response

Respondents raised concerns about the need for stronger protection of existing environmental assets, including trees, hedgerows, green spaces and soils, and called for clearer and more directive policy wording. Some objected to the removal of explicit support for development whose primary objective is to conserve and enhance biodiversity. Many responses focused on agricultural land, with strong support for safeguarding best and most versatile land (BMV) for food production. However, concerns were also raised about the potential burden if there were to be a requirement to demonstrate consideration of alternatives. There was strong support for wildlife-friendly features such as swift bricks, although some considered these better addressed through building regulations. Respondents also called for greater recognition of local ecological evidence in decision-making. Views on BNG were similar to those made in response to questions 179 and 180, with some supporting the proposed approach to improve consistency and avoid duplication with the statutory framework, while others were concerned it could limit local discretion to secure higher gains when justified.

The government has considered these responses and has made revisions. Policy N2(1)(b) has been updated to clarify the approach to agricultural land. The revised wording makes clear that development proposals should take into account the quality and grade of agricultural land and most particularly whether it is classed as 'best and most versatile' land, but this does not require the consideration of alternatives unless significant development is necessary. An addition to paragraph (f) of the policy makes clear that it is adverse impacts on biodiversity which should be avoided (as opposed to positive impacts which could arise from development). Additional text has also been added to policy S5(1)(a) to emphasise the importance of development proposals which support nature conservation, restoration and/or enhancement. A footnote (number 69 in the consultation draft) has been moved into the policy itself as new paragraph N2(3).

The government considers that, read alongside the wider Framework, the policy provides appropriate protection for environmental assets while maintaining sufficient flexibility in decision-making.

Question 182: Do you agree the policy in Policy N4 provides a sufficiently clear basis for considering development proposals affecting protected landscapes and reflecting the statutory duties which apply to them?

A total of 728 respondents answered Question 182. Of those, 15% strongly agreed, 26% partly agreed, 23% neither agreed nor disagreed, 14% partly disagreed and 22% strongly disagreed. This indicates mixed views, with support and opposition broadly balanced.

Government response

There was support for the policy as a clear basis for making decisions on development within Protected Landscapes, particularly within local authorities, neighbourhood planning bodies and professional bodies. However, a significant number of respondents, including interest groups, expressed concern that protections had been weakened through changes to the wording and perceived inconsistencies with the legislation. Some respondents raised that changes to the wording on major development lowered the bar for consent, particularly the shift from 'should be refused unless' to 'should only be supported if', and the removal of 'and' in the exceptional circumstances and public interest test.

Some respondents also raised a further issue that N4, as drafted, was inconsistent with the Protected Landscapes duty, introduced by the Levelling Up and Regeneration Act 2023. They wanted language in the policy to align with the statutory requirement 'seek to further' the statutory purposes of Protected Landscapes. Concerns were also raised about a change of language from giving 'great' to 'substantial' weight in reflecting the statutory purposes of Protected Landscapes, and about the proposed removal of text referring to them having "the highest status of protection".

There was support for the new wording on mitigation and compensation, including the recognition of impacts on tranquillity and dark skies.

The government has considered these responses and has amended policy N4 in relation to major development. The wording 'should be refused' has been reinstated to retain the strong presumption against major development in Protected Landscapes. The word 'and' has also been reinserted into the exceptional circumstances and public interest test to confirm that this remains a two-limbed test.

The policies of the NPPF embed consideration of the statutory purposes of Protected Landscapes into the planning process and sit alongside the requirement to apply the duty when undertaking any function in relation to, or so as to affect, land in a Protected Landscape. Therefore, we do not think it is necessary to restate the statutory duty in national planning policy.

References to giving ‘substantial’ rather than ‘great’ weight have been retained, in line with the wider standardisation of phrasing referring to weight across the NPPF. This change is not intended nor considered to diminish the actual weight which would be given to the importance of these areas in policy terms, as it reflects the consistent approach being taken to matters that are given particular importance in the new Framework. Similarly, Protected Landscapes will retain the same high level of statutory protection, notwithstanding the removal of the "the highest status of protection" wording which was used in the December 2024 NPPF.

The government considers that, with the changes made following consultation, policy N4 provides a clear and robust framework for safeguarding Protected Landscapes and aligns with the Protected Landscapes Duty.

Responses for Questions 183 and 184 have been grouped.

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

A total of 734 respondents answered Question 183. Of those, 20% strongly agreed, 22% partly agreed, 22% neither agreed nor disagreed, 21% partly disagreed and 14% strongly disagreed. This indicates mixed views, with support and opposition broadly balanced.

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

A total of 499 respondents answered Question 184.

Government response

There were mixed views on the effectiveness of policy N6 in setting out the hierarchy of protected sites. Concerns focused on alignment with the Habitats Regulations, in particular the use of “imperative reasons of overriding public importance” rather than the statutory wording “imperative reasons of overriding public interest”. Respondents also raised concerns that the removal of wording on impacts from development outside designated boundaries could weaken protections for Sites of Special Scientific Interest.

There were calls for stronger protection for irreplaceable habitats, including views that harm should not be justified in any circumstances and that compensation cannot adequately address losses. Some respondents noted that the revised definition of irreplaceable habitats remains non-exhaustive and should be expanded, for example to include chalk streams, with calls for further consultation. Although not directly consulted on, many respondents commented on the change from “age, size and condition” to “age, size or condition” in the definition of ancient or veteran trees. A clear majority who commented on it opposed this change on the basis that it could broaden the classification (and in so doing create additional barriers to development), while others supported it as providing flexibility to consider a wider range of trees as ancient or veteran, and for consistency with definitions found elsewhere.

Respondents emphasised the importance of Environmental Delivery Plans (EDPs) securing robust biodiversity outcomes and being supported by accurate data, effective implementation, monitoring and enforcement. Some also stressed that the nature restoration levy should be proportionate and fair to developers.

The government has considered these responses and has made targeted amendments to policy N6 to address the issues raised. The wording in N6(1)(a)(i) has been revised to refer to the derogation tests (which are set out fully in a footnote) to align with the relevant legislation. The glossary definition of ‘ancient or veteran tree’ has been reverted to the 2024 Framework wording, as the change to ‘or’ was made in error, and we have noted the concerns which were raised about the impact of such a change, as well as the points made by those who argued that it would have benefits. Additional wording has been introduced to N6(3) to ensure that decision-makers fully consider adverse impacts from development inside or outside designated areas.

The government considers that the definition of irreplaceable habitats in the glossary will assist decision-makers in determining whether areas fall within its scope.

The Planning and Infrastructure Act 2025 provides a wider framework of safeguards for EDPs, including consultation, monitoring, backup measures and the ability to amend and revoke plans. An EDP that would result in irreversible or irreparable harm could not be approved, as it would fail to secure the required overall environmental improvement. In most cases, EDPs will remain voluntary. They will need to be viable and attractive to developers, and accordingly Natural England will need to set levy rates that are proportionate while still securing conservation measures sufficient to materially outweigh the impact of EDP development.

Chapter 20 – Conserving and enhancing the historic environment

Responses for Questions 185 and 186 have been grouped.

Question 185: Do you agree the government should implement the additional regard duties under Section 102 of the Levelling-Up and Regeneration Act?

A total of 604 respondents answered Question 185. Of those, 44% strongly agreed, 17% partly agreed, 31% neither agreed nor disagreed, 3% partly disagreed and 5% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Question 186: Do you have any evidence as to the impact of implementing the additional regard duties for development?

A total of 263 respondents answered Question 186.

Government response

Section 102 of the Levelling-up and Regeneration Act 2023 made provision for new ‘special regard’ duties on decision makers when considering the impact of development proposals on World Heritage Sites, scheduled monuments, registered battlefields, parks and gardens and protected wrecks (similar to the current duties for listed buildings and conservation areas). If commenced, these special regard duties would underpin the heritage decision-making policies in the NPPF.

Respondents in support considered the implementation of these special regard duties would align statutory protection across designated heritage assets and provide greater consistency and clarity in decision-making. Some respondents emphasised the need to balance stronger heritage protection with the delivery of housing and infrastructure. Others considered that existing protections for these assets provided through NPPF policy already provides sufficient protection and raised concerns that additional duties could increase burdens on local authorities and developers, leading to delays and additional evidence requirements.

Respondents identified positive impacts including that it would result in earlier and more robust heritage assessment, better informed development proposals, the reduction in unintended harm to assets and greater legal certainty. The types of negative impact identified included slower decision-making and delivery of schemes.

The government has considered these responses and acknowledges the broad support for introducing additional special regard duties, alongside concerns about proportionality, potential burdens on decision-makers and impacts on delivery. The government considers that aligning statutory protection across heritage assets will improve consistency and clarity in planning decisions, while supporting more effective consideration of heritage impacts. At the same time, it is important that any changes do not create unnecessary delays or disproportionate evidential requirements.

The government will therefore proceed with implementing the additional special regard duties, while ensuring that guidance and implementation are proportionate and support timely decision-making.

Question 187: Do you agree with the approach to plan-making for the historic environment, including the specific requirements for World Heritage Sites and Conservation Areas, set out in policies HE1 - HE3?

A total of 652 respondents answered Question 187. Of those, 29% strongly agreed, 30% partly agreed, 24% neither agreed nor disagreed, 11% partly disagreed and 6% strongly disagreed. This indicates broad support for the proposal.

Government response

While there was broad support, respondents emphasised the need for greater clarity and consistency in terminology to ensure alignment with statutory regard duties for heritage. In particular, concerns were raised about different phrasing throughout the document in relation to conservation, preservation and enhancement, with some viewing ‘preserve’ as implying more limited scope for change. There was general support for the recognition that heritage considerations should be taken into account in design codes, masterplans etc. However, some respondents considered that there could be further recognition of the historic environment’s contribution to placemaking and sustainable growth.

The government has considered these responses and welcomes the strong support for the proposed policies. The government agrees that clarity and consistency of terminology are important for effective implementation and has therefore made a number of drafting changes to improve alignment with statutory regard duties and ensure the policies are clearly understood. Specifically we have taken a consistent approach to using the phrase ‘conserve’ throughout the chapter, and have amended the definition to align this with the statutory regard duties on decision makers to preserve or enhance designated heritage assets.

The government does not consider that substantive changes to policies HE1 to HE3 are required. However, minor amendments have been made to further emphasise the contribution of the historic environment to placemaking and sustainable development, responding to the views raised. In particular, the text of policy HE3 has been expanded to address sector feedback that it could address the role of Historic Environment Records more fully.

Responses for Questions 188 and 189 have been grouped.

Question 188: Do you agree with the approach to assessing the effects of development on heritage assets set out in policy HE5?

A total of 666 respondents answered Question 188. Of those, 29% strongly agreed, 31% partly agreed, 24% neither agreed nor disagreed, 9% partly disagreed and 8% strongly disagreed. This indicates broad support for the proposal.

Question 189: Do you agree with the approach to considering impacts on designated heritage assets in policy HE6, including the change from "great weight" to "substantial weight", and in particular the interactions between this and the statutory duties?

A total of 696 respondents answered Question 189. Of those, 25% strongly agreed, 24% partly agreed, 25% neither agreed nor disagreed, 12% partly disagreed and 15% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

Respondents, particularly local planning authorities, parish and town councils, neighbourhood planning bodies and the heritage sector, supported a clearer and more structured approach to the assessment of effects on heritage assets. However, some – especially in the heritage sector – sought greater clarity, including explicit reference to assessments involving assets with archaeological interest. Other respondents raised concerns about subjectivity, noting the potential for differing interpretations either to justify development or to strengthen protection.

The government has considered these responses and has made some amendments to the wording of the policies to improve clarity, including reflecting the approach to heritage assets with archaeological interest (which partly reflects the deletion of policy HE10 in the consultation document) as explained below. For the same reason a number of clarificatory changes have been made to policy HE4.

In relation to policy HE6 on proposals affecting designated heritage assets, respondents expressed mixed views on the change from 'great' weight to 'substantial' weight, with differing opinions on its effect on levels of protection. The government has considered these responses and is clear that this change does not reduce heritage protections. The government remains satisfied that the revised wording in policy HE6 maintains the existing level of protection and that, when following the approach set out in the NPPF decision makers will discharge the statutory regard duties in relation to the protection of designated heritage assets. To make the importance of designated heritage assets absolutely clear, a new paragraph (3) has been added to policy HE6 pointing out that any harm to a designated heritage asset will be a matter of considerable importance and weight when considering proposals in the context of the policy.

Respondents also commented on the list of 'important public benefits' in policy HE6(4), with some calling for explicit reference to housing where there is an identified need. The government has considered these responses but has decided not to amend the non-exhaustive list of 'important public benefits' in policy HE4(3), as meeting the need for homes is already an important benefit that should be considered as set out in other parts of the Framework.

The government is satisfied that the amended policies provide a clearer, appropriate and proportionate framework for considering impacts on designated heritage assets.

Responses for Questions 190 and 191 have been grouped.

Question 190: Do you agree with the new policies in relation to world heritage, conservation areas and archaeological assets in policies HE8 - HE10?

A total of 636 respondents answered Question 190. Of those, 29% strongly agreed, 29% partly agreed, 26% neither agreed nor disagreed, 9% partly disagreed and 7% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Question 191: Do you have any other comments on the revisions to the heritage chapter?

A total of 436 respondents answered Question 191.

Government response

Respondents supported the overall approach but raised some specific concerns, particularly from the heritage sector, about the treatment of archaeological assets. There was also feedback from sector bodies on the use of UNESCO terminology for World Heritage Sites. Across responses, there was a call for clearer and more consistent policy wording, including the treatment of heritage assets with archaeological interest and the use of terms such as conservation, preservation and enhancement. Respondents also identified a perceived inconsistency between the approach to designated and non-designated heritage assets.

There was particular emphasis from sector organisations and local planning authorities on the treatment of archaeological assets and the structure of related policies.

The government has considered these responses and has amended the Framework to improve clarity, consistency and alignment with legislation. In response to concerns about archaeological assets, policy HE10 has been removed and its content incorporated into policies HE4 and the revised HE10 (previously HE11), ensuring a consistent approach to heritage assets with archaeological interest within the wider policy framework.

In response to feedback on terminology, the government has incorporated appropriate UNESCO terminology in relation to World Heritage Sites. As set out in response to question 187 the Framework has also been revised to use the term ‘conservation’ consistently, supported by a clear glossary definition, to reflect statutory regard duties and encompass both preservation and enhancement.

The government has also revised policy HE7 on non-designated heritage assets to align more closely with policy HE5. This ensures a more consistent approach to assessing impacts and that appropriate weight is given relative to the protections set out in policy HE6 for designated heritage assets.

Transitional arrangements

Question 192: Do you agree with the transitional arrangements approach to decision-making?

A total of 669 respondents answered Question 192. Of those, 22% strongly agreed, 19% partly agreed, 26% neither agreed nor disagreed, 12% partly disagreed and 20% strongly disagreed. This indicates mixed views, with support and opposition broadly balanced.

Government response

Those who supported the proposal highlighted the benefits of quicker implementation of new policies and greater clarity of intent. Those who did not support the approach raised concerns that it could undermine the plan-led system and disincentivise plan-making. Concerns were also expressed that the need to consider inconsistency between development plan policies and national decision-making policies could lead to increased debate and potential litigation, and that the drafting of the policy should be clearer to minimise disputes.

The government has considered these responses and has decided to proceed with the proposed policy approach, with minor adjustments to improve its clarity and operation. It now makes clear that the policy can apply to parts of development plan policies to address concerns that entire policies could be given limited weight based on partial inconsistency. In addition, inconsistency is to be assessed based on material differences as opposed to being inconsistent ‘in any way’, in response to concerns that the policy as drafted was too hard-edged and could apply too broadly.

Written Ministerial Statements and other documents

Question 193: Do you have any further thoughts on the policies outlined in this consultation?

A total of 1,011 respondents answered Question 193.

Government response

Views were mixed, with many respondents using this question to raise wider issues that extended beyond the specific proposals consulted on. Respondents frequently highlighted broader concerns about housing delivery, environmental sustainability and the operation of the planning system, reflecting the wide-ranging nature of the changes proposed to the NPPF.

Many respondents reiterated issues addressed elsewhere in this consultation response, including the importance of environmental sustainability, the protection of rural landscapes and the need to ensure that viability considerations do not impede development delivery. There was also support for increasing the provision of affordable and accessible housing. Beyond the specific proposals consulted on, a number of respondents raised concerns about the role of national housing targets, the rate at which developers build out permitted schemes, the capacity and resources available to local planning authorities, and the potential implications of local government reorganisation for planning services and plan-making.

The government has considered these responses and has taken them into account where relevant in the development of the Framework and in the relevant chapters of this consultation response. Many of the issues raised are addressed through the government's wider package of planning reforms and through policies set out elsewhere in the Framework.

The government remains committed to ensuring that housing targets support the delivery of homes where they are needed, while maintaining a plan-led approach to development. We also recognise the importance of increasing the rate at which planning permissions are built out and are continuing to consider measures that support the timely delivery of approved development. In addition, we recognise the importance of ensuring that local planning authorities have the capacity and capability required to implement reforms effectively and will continue to support improvements to planning services. The government will also continue to consider the implications of local government reorganisation as reforms are implemented to ensure that planning functions remain effective and responsive throughout the transition process.

Question 194: Do you agree with the list of Written Ministerial Statements set out in Annex A to the draft Framework whose planning content would be superseded by the policies proposed in this consultation?

A total of 526 respondents answered Question 194. Of those, 28% strongly agreed, 7% partly agreed, 42% neither agreed nor disagreed, 5% partly disagreed and 8% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

There was support for policy consolidation and clarity on superseded Written Ministerial Statements and other policy documents. There were views expressed calling for the list to be regularly updated in a transparent process. Several suggestions for additions to the list were received.

In response, the government has added Planning Update (25 March 2015) and Business, Innovation and Skills (10 October 2013) to the list of Written Ministerial Statements and other documents, where content relating to planning policies or decisions, has either been fully or partially incorporated with the Framework or no longer represents up-to-date government policy. We will keep the list under review.

Annex A – Data Centres and onsite energy generation

Responses for Questions 195, 196, 197, 198 and 199 have been grouped.

Question 195: Do you consider the planning regime, including reforms being delivered through the Planning and Infrastructure Act, provides sufficient flexibility for energy generation projects co-located with data centres to be consented under either the NSIP or TCPA regime?

A total of 553 respondents answered Question 195. Of those, 13% strongly agreed, 20% partly agreed, 48% neither agreed nor disagreed, 10% partly disagreed and 10% strongly disagreed. This indicates broad support, with a significant proportion of neutral responses.

Question 196: Would raising the Planning Act 2008 energy generation thresholds for renewable projects that are co-located with data centres in England (for the reason outlined above) be beneficial? a) If so, what do you believe would be the appropriate threshold? Please provide your reasons.

A total of 323 respondents answered Question 196. Of those, 49% said yes and 51% said no. This indicates mixed views, with support and opposition broadly balanced.

Question 197: Do you have any views on how we should define 'co-located energy infrastructure? Please provide your reasons.

A total of 291 respondents answered Question 197.

Question 198: Do you think the renewable energy generation thresholds under Section 15 of the Planning Act 2008 for other use types of projects should be increased, or should this be limited to projects co-located with data centres?

A total of 279 respondents answered Question 198. Of those, 36% agreed and 65% did not. This indicates mixed views, with opposition to changing thresholds outweighing support.

Question 199: What benefits or risks do you foresee from making this change? Please provide your reasons.

A total of 263 respondents answered Question 199.

Government response

Overall, views were mixed, with broad agreement that the existing planning regime provides a degree of flexibility, alongside concerns about complexity and operational issues.

Many respondents considered that the current regime already offers sufficient flexibility for co-located energy generation and data centre projects to be consented under either the NSIP or TCPA regimes. They highlighted that projects can, in practice, choose the most appropriate route on a case-by-case basis, with the NSIP regime suited to larger projects and the TCPA regime to smaller schemes. However, others pointed to complexity arising from fragmentation and rigid thresholds, and to operational issues such as misaligned timelines between regimes, rather than fundamental structural limitations.

Views on raising Planning Act 2008 thresholds for co-located renewable energy projects were evenly split. Those opposed emphasised the risk of diverting significant projects out of the NSIP regime, potentially placing additional burdens on local planning authorities and increasing complexity. Those in favour argued that thresholds are outdated and that raising them could reduce consenting burdens and speed up delivery. Most respondents did not support extending any threshold changes beyond projects co-located with data centres, citing the need for a consistent approach across sectors and to avoid arbitrary distinctions.

Responses on defining ‘co-located energy infrastructure’ emphasised the need for a clear and precise definition. Common features identified included physical proximity on the same or adjacent site, generation linked to on-site demand (particularly behind-the-meter supply to data centres), shared grid connections, integrated planning consent, and optimisation of the overall energy system. Respondents stressed that clarity would be necessary to prevent misuse.

Respondents identified both benefits and risks to changing thresholds or planning arrangements. Potential benefits included faster delivery and reduced consenting burdens, while risks focused on increased pressure on local authority capacity, fragmentation of decision-making, and the potential for complex schemes to be considered outside the NSIP regime.

The government has considered these responses and recognises the importance of ensuring a robust, proportionate and flexible planning framework to support co-located energy generation and data centre development. The government considers that the existing framework, including powers under the Planning Act 2008 and new provisions introduced through the Planning and Infrastructure Act 2025, provides sufficient flexibility to determine, on a case-by-case basis, whether projects should be consented through the NSIP or TCPA regime.

In light of the consultation responses, the government has not identified compelling evidence that the current regime lacks the flexibility needed to support such developments. Nor has it identified sufficient justification to amend the current renewable energy thresholds, which were last reviewed in 2025.

The government will therefore maintain the existing approach. It will continue to apply the current framework, supported by case-by-case consideration, to ensure that co-located energy infrastructure can be delivered efficiently while maintaining appropriate oversight and consistency across the planning system.

Annex B – Viability: Standardised inputs in viability assessment

Responses for Questions 200 and 201 have been grouped.

Question 200: Would you support the use of growth testing for strategic, multi-phase schemes?

A total of 533 respondents answered Question 200. Of those, 17% strongly agreed, 24% partly agreed, 39% neither agreed nor disagreed, 5% partly disagreed and 16% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Question 201: Would you support the optional use of growth testing for regeneration schemes?

A total of 515 respondents answered Question 201. Of those, 15% strongly agreed, 23% partly agreed, 42% neither agreed nor disagreed, 6% partly disagreed and 14% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

Respondents recognised that growth testing could have value in certain circumstances, particularly for larger or more complex schemes. However, significant concerns were raised about reliance on uncertain future assumptions, including the potential to complicate viability assessments, increase uncertainty in negotiations and delay development. Views also varied across respondent groups, with developers more likely to oppose the proposals and local authorities tending to adopt a more neutral position. A number of respondents considered that growth testing may be more appropriate as part of sensitivity or scenario analysis, particularly for strategic, multi-phase or regeneration schemes where market conditions may change over time.

Please see the government response to Questions 211 and 212.

Responses for Questions 202, 203 and 204 have been grouped.

Question 202: Do you agree greater specificity, including single figures, which local planning authorities could choose to diverge from where there is evidence for doing so, would improve speed and certainty? a) Please explain your answer. If you agree, the government welcomes views on the appropriate figure – for example, whether 17.5% would be an appropriate reflection of the industry standard for most market for sale housing.

A total of 531 respondents answered Question 202. Of those, 20% strongly agreed, 15% partly agreed, 42% neither agreed nor disagreed, 6% partly disagreed and 17% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Question 203: Are there any site types, tenures or development models to which alternative, lower figures to 15-20% of Gross Development Value might reasonably apply? a) Please explain your answer. The government is particularly interested in views on whether clarifying an appropriate profit of 6% on Gross Development Value for affordable housing tenures would make viability assessments more transparent and speed up decision-making.

A total of 380 respondents answered Question 203.

Question 204: Are there further ways the government can bring greater specificity and certainty over profit expectations across landowners, site promoters and developers such that the system provides for the level of profit necessary for development to proceed, reducing the need for subjective expectations?

A total of 362 respondents answered Question 204.

Government response

Some respondents considered that a standardised return figure could improve transparency and provide greater certainty in viability assessments. However, a number of respondents raised concerns that prescribing a fixed national return figure rather than the current range in Planning Practice Guidance would not adequately reflect the differing risk profiles of development schemes, reflecting concerns about its practical application across different development contexts. Respondents emphasised that development viability can vary significantly depending on factors such as site characteristics, market conditions and levels of development risk. Concerns were also raised that a fixed return could reduce flexibility, discourage investment in more complex or higher-risk schemes, and create additional disputes rather than reducing them.

Respondents identified a number of circumstances where lower returns than the current 15-20% range may be appropriate. In particular affordable housing, public sector-led and community-led schemes where lower levels of market risk, grant funding and a stronger focus on public value may justify lower returns. Some respondents suggested returns closer to 6% of Gross Development Value for these types of developments. Further to these, other respondents noted that lower returns may be appropriate where schemes benefit from public sector investment or intervention that reduces development risk.

Please see the government response to Questions 211 and 212.

Responses for Questions 205, 206 and 207 have been grouped.

Question 205: Existing Viability Planning Practice Guidance refers to developer return in terms of a percentage of gross development value. In what ways might the continued use of gross development value be usefully standardised?

A total of 309 respondents answered Question 205.

Question 206: Do you agree there are circumstances in which metrics other than profit on gross development value would support more or faster housing delivery, or help to maximise compliance with plan policy?

A total of 465 respondents answered Question 206. Of those, 12% strongly agreed, 19% partly agreed, 50% neither agreed nor disagreed, 7% partly disagreed and 12% strongly disagreed. This indicates mixed views, with a significant proportion of neutral responses.

Question 207: Are there types of development on which metrics other than profit on gross development value should be routinely accepted as a measure of return e.g. strategic sites, large multi-phased schemes or build to rent schemes?

A total of 318 respondents answered Question 207.

Government response

Some respondents supported the use of alternative metrics on the basis that they may provide a more accurate assessment of returns for certain forms of development. In particular, respondents noted that Internal Rate of Return (IRR) may better reflect investment decisions for long-term, income-generating developments and strategic, master-planned schemes. However, a number of respondents raised concerns about the complexity of IRR and questioned how it could be applied consistently within the planning system. Concerns were also raised about the need for further guidance and evidence before any changes to national policy or practice are introduced.

Please see the government response to Questions 211 and 212.

Question 208: Do you agree that guidance should be updated to reflect the fact a premium may not be required in all circumstances? a) In what circumstances might a premium, or the usual premium, not be required? b) What impact (if any) would you foresee if this change were made?

A total of 495 respondents answered Question 208. Of those, 21% strongly agreed, 17% partly agreed, 40% neither agreed nor disagreed, 4% partly disagreed and 18% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

Respondents generally accepted that a landowner premium may not always be justified, particularly where land represents a liability rather than an asset. However, a number of respondents emphasised the importance of retaining flexibility and ensuring that decisions are based on the specific circumstances of individual sites. Respondents highlighted the need for professional judgement in determining whether a premium is appropriate, rather than relying on a prescriptive national approach. Some respondents highlighted that current guidance already allows for a zero or nominal premium.

Please see the government response to Questions 211 and 212.

Responses for Questions 209 and 210 have been grouped.

Question 209: Do you agree that extant consents should not be assumed to be sufficient proof of alternative use value, unless other provisions relating to set out in plans are met? [sic]

A total of 484 respondents answered Questions 209. Of those, 29% strongly agreed, 16% partly agreed, 39% neither agreed nor disagreed, 5% partly disagreed and 12% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Question 210: If extant consents were not to be assumed as sufficient proof of alternative use value, should this be at the discretion of the decision-maker, or should another metric, such as period of time since consent granted, be used? a) If another metric, please set out your preferred approach and rationale.

A total of 289 respondents answered Question 210.

Government response

Respondents generally recognised the importance of ensuring that Alternative Use Value (AUV) assessments are robust and policy compliant, while also emphasising the need for flexibility and professional judgement in their application. Respondents considered that AUV should reflect current market conditions, policy requirements and site circumstances, and should therefore be supported by up-to-date evidence rather than relying solely on historic or potentially undeliverable permissions.

Some respondents supported the proposal on the basis that extant planning permissions should not automatically be treated as sufficient evidence of AUV where they are not consistent with current plan policies. They considered that this would help ensure that land value assessments better reflect the plan-led system, avoid inflated land values and reduce the risk of viability assessments undermining affordable housing and infrastructure delivery. Respondents also highlighted the importance of ensuring that any use of extant consents is supported by clear national guidance and evidence of deliverability, viability and policy compliance.

However, a number of respondents raised concerns that a more restrictive approach could fail to recognise the significance of extant permissions, particularly where they relate to advanced-stage proposals supported by substantial investment, financing arrangements and implementation activity. Respondents consistently emphasised the importance of retaining flexibility and allowing decision-makers to assess the relevance of extant permissions on a case-by-case basis.

We note that Question 209 in the consultation document contained a minor drafting omission, with the term "alternative use" inadvertently omitted from the final clause. Question 209 should have read: "Do you agree that extant consents should not be assumed to be sufficient proof of alternative use value, unless other provisions relating to alternative use set out in plans are met?" The omission resulted in the question being grammatically incomplete, although the intended meaning is likely to have remained clear to respondents given the subject matter and context of the surrounding text.

Please see the government response to Questions 211 and 212.

Responses for Questions 211 and 212 have been grouped.

Question 211: What further steps should the government take to ensure non-policy compliant schemes are not used to inform the determination of benchmark land values in the viability assessments that underpin plan-making?

A total of 322 respondents answered Question 211.

Question 212: Do you agree that the residual land value of the development proposal should be cross-checked with the residual land values of comparable schemes; to help set the viability assessment in context.

A total of 498 respondents answered Question 212. Of those, 12% strongly agreed, 19% partly agreed, 50% neither agreed nor disagreed, 7% partly disagreed and 12% strongly disagreed. This indicates mixed views, with a significant proportion of neutral responses.

Government response

Many respondents supported explicitly excluding non-policy compliant schemes from benchmark land value assessments, arguing that policy-compliant comparables are necessary to avoid inflated land values and support the delivery of affordable housing and infrastructure. However, others emphasised that this is dependent upon the exercise of professional judgement, noting that market evidence may require adjustment, and that this can be a carefully balanced exercise.

In response to the proposal to use comparable residual land values (RLVs) as a cross-check in viability assessments, respondents expressed a range of views. Some considered that comparing assessed residual land values against those derived from comparable sites could help test the robustness of viability assessments and provide a useful sense-check where assumptions appeared inconsistent with broader evidence. Others raised concerns that this approach would increase complexity, require access to detailed information on comparable transactions, and risk delaying the assessment process.

In addition, some respondents also commented more broadly on the use of cross-checks against the transaction price of the subject site, or against sales values from comparable sites. Some considered these approaches could provide further benchmarks against which to assess land value assumptions and improve transparency. However, others highlighted limitations in the availability and transparency of sales data, raising concerns about the reliability of such comparisons and the additional burden they could place on local planning authorities and other participants in the planning process.

We note that a slightly expanded version of Question 212 was later included in the list of questions published alongside the consultation. This discrepancy does not appear to have materially affected the responses received.

Having considered the feedback received through the consultation, the government has decided to not take forward a technical annex to include standardised inputs in viability assessment. While we understand the need for a consistent framework for evaluating development proposals and certainty in the viability assessment process, we consider that further engagement is needed with local planning authorities, developers, development surveyors and other key stakeholders. This will ensure that any changes are thoroughly tested prior to implementation. Viability Planning Practice Guidance will continue to provide guidance on standardised inputs – and policy DM5 is clear that viability assessment should be carried out in accordance with this guidance. The government appreciates the feedback received and will use it to inform a wider update of the Planning Practice Guidance, to be published as soon as possible.

Annex C – Reforming site thresholds

Responses for Questions 213 and 214 have been grouped.

Question 213: Do you agree that a 2.5-hectare threshold is appropriate?

A total of 601 respondents answered Question 213. Of those, 20.5% strongly agreed, 20% partly agreed, 34% neither agreed nor disagreed, 12% partly disagreed and 14% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Question 214: Do you agree that a unit threshold of between 10 and 49 units is appropriate?

A total of 607 respondents answered Question 214. Of those, 24.7% strongly agreed, 24.1% partly agreed, 31% neither agreed nor disagreed, 7.6% partly disagreed and 12.7% strongly disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

There was broad support for the definition of 'medium' development. Many respondents welcomed increasing the site area threshold to 2.5 hectares, noting it better reflects typical development densities, and allows for the provision of infrastructure and other land uses. Some respondents however raised concerns as to how this this would interact with existing density policies. There were more mixed views in relation to the 49-unit threshold. Some respondents considered schemes of this size could still have significant local impacts and were concerned that reducing planning requirements could lead to inappropriate development. Others however considered a higher threshold was needed to better support higher-density development, particularly in urban areas. A number of respondents advocated for locally derived thresholds that better respond to local circumstances. Broader concerns were also raised about the potential impacts of sites of 49 units on matters such as biodiversity, heritage and flood risk.

The government has carefully considered these responses and is proceeding with the proposed definition of 'medium' development as schemes of up to 2.5 hectares and between 10 and 49 units. The government recognises concerns that a single national threshold may not reflect all local circumstances. However, as most schemes of 10 to 49 units are delivered by SMEs, it considers that this definition strikes an appropriate balance between ensuring a more proportionate planning system for SME developers and supporting delivery across a range of locations, while retaining clear expectations for larger and more complex schemes.

The government also notes concerns about density, environmental impacts and site-specific effects. Existing national and local density policies will remain material considerations in decision-making, including for developments within the medium category, ensuring that impacts on biodiversity, heritage, flood risk and local character continue to be properly assessed.

Responses for Questions 215 and 216 have been grouped.

Question 215: Do you foresee risks or operability issues anticipated with the proposed definition of medium development?

Question 216: If so, please explain you answer and provide views on potential mitigations?

A total of 469 respondents answered Questions 215 and 216. Of those responding to Question 215, 66% answered yes, and 34% answered no. This indicates broad opposition to the proposal.

Government response

The most frequently raised concern was the risk of artificial site subdivision or threshold gaming, which respondents considered could reduce affordable housing delivery and lead to adverse environmental outcomes. Many called for clearer guidance or safeguards to help mitigate these concerns. Respondents also highlighted a lack of clarity in the proposed definition, particularly in terms of the relationship between 'medium' and 'major' development, how different policies should apply to each scale of development, and how these definitions relate to those set out in the Development Management Procedure Order. Wider concerns included potential impacts on development density, affordable housing contributions and the capacity of local planning authorities. Those who did not identify operability issues generally considered risks would be limited if definitions were clear and applied consistently.

The government has considered these responses and acknowledges the importance of clear and consistent definitions to support effective implementation. In response to concerns, the government has amended the Glossary to clarify that medium development is a sub-category of major development, as defined in the Development Management Procedure Order. This makes clear that policies in the Framework which relate to major development also apply to medium development, while also enabling some policies to apply exclusively to medium development, to reflect the specific needs of this scale of development.

The government recognises concerns about threshold gaming. It considers that existing and updated policies within the Framework, including policy HO13, provide safeguards to ensure that allocated strategic sites are not undermined by piecemeal development. All relevant national and local policies will continue to apply in decision-making, helping to mitigate the risks identified.

Questions 217 to 221 relate to the implementation of the Building Safety Levy and do not result in changes to the National Planning Policy Framework. These questions have been considered separately from those on the Framework and does not contain the same categorisation of agreement as other questions in the response.

Question 217: Do you have any views on whether the current small development exemption should be extended to cover a wider range of sites – indicatively to sites of fewer than 50 dwellings, or fewer than 120 bedspaces in purpose-built student accommodation?

A total of 366 respondents answered Question 217. Of those, 43% agreed, 26% neither agreed nor disagreed, and 31% disagreed. This indicates broad support for the proposal, with a significant proportion of neutral responses.

Government response

Supporters argued that extending the exemption would improve the viability of smaller and medium-sized sites, reduce compliance and evidential costs, and support increased housing delivery, particularly by SME developers. Those who disagreed raised a range of concerns, including the risk of developers seeking to avoid the levy, potential impacts on affordable housing, and disagreement over the appropriate threshold. Some respondents also questioned whether the change would have the intended effects, or disproportionately impact certain types of developers and sites, and raised concerns about increased development.

The government has considered these responses and recognises the case for extending the exemption to sites of fewer than 50 units, particularly to support SME developers facing viability challenges and to encourage delivery from smaller sites. However, the government has decided to maintain the current exemption threshold of fewer than 10 units. This reflects the need to prioritise levy revenue to fund building safety work at pace, with ensuring residents' safety remaining the primary priority.

The government notes the concerns about potential gaming and confirms that anti-avoidance provisions are in place: the total number of units within a planning permission redline is taken into account when calculating the levy, preventing developers from splitting sites across multiple applications. The government also notes that levy income is not linked to social housing or local infrastructure contributions, and therefore extending the exemption would not have directly reduced delivery through those mechanisms.

The government will keep the threshold under review. There is a statutory requirement to review the levy at least every three years.

Question 218: If the exemption were to be extended, do you have any views on whether the development of 120 purpose-built student accommodation bedspaces is an appropriate equivalent to a development of 50 dwellings for the purposes of the levy exemption?

A total of 258 respondents answered Question 218. Of those, 32% agreed, 36% neither agreed nor disagreed, and 31% disagreed. This indicates views were mixed, with a significant proportion of neutral responses.

Government response

Among those who supported the proposal, respondents considered the ratio appropriate and valued having a simple, consistent comparator, including alignment with the Housing Delivery Test. Those who disagreed questioned whether a direct equivalence between dwellings and purpose-built student accommodation (PBSA) is appropriate, citing differences in density, occupancy patterns, infrastructure demands and business models, and some considered the specific ratio unsuitable.

The government has considered these responses and, in light of the decision set out in response to Question 217, will not extend the exemption at this time.

On the principle of equivalence, the government considers that 120 PBSA bedspaces do represent a fair and established equivalent to 50 dwellings. This 2.4:1 ratio is used in the Housing Delivery Test and reflects the different characteristics of PBSA, including higher density and distinct infrastructure demands. It also provides a simple and consistent approach for developers and local authorities to apply.

Question 219: If the exemption were to be extended, do you have any views on whether the exemption should be based solely on the existing metrics (dwellings/bedspaces) or whether there should also be an area threshold?

A total of 246 respondents answered Question 219.

Government response

Among those expressing a clear view, most opposed including a site-area threshold, primarily citing increased complexity and administrative burden. Respondents who supported an area-based element argued that unit numbers alone may not capture wider site impacts, and that an additional threshold could help address issues such as environmental effects or prevent large footprint, low density schemes from avoiding scrutiny.

The government has considered these responses and does not consider that a site-area threshold is appropriate for the Building Safety Levy. The responses highlight a preference for simplicity and concerns about administrative complexity. A unit-based approach provides a clear and consistent method for calculating the levy, minimising burdens on developers and local authorities.

Question 220: If you do have views on possible changes to the small developments levy exemption, please specify the potential impact of the possible change of the levy exemption on people with protected characteristics as defined in section 149 of the Equality Act 2010.

A total of 197 respondents answered Question 220.

Government response

Some respondents raised concerns about the potential impacts of the levy on people with protected characteristics. These focused on the risk that funding for affordable and accessible housing, and support for local services, could be affected. Others were concerned that changes could slow the pace of remediation, with disproportionate impacts on certain groups.

A number of responses highlighted specific characteristics, particularly age and disability. These respondents emphasised the importance of considering housing with care for older people and raised concerns about the impact of any reduction in remediation funding on disabled people in high-rise buildings. A small number of respondents noted a potential positive effect, suggesting that improved viability could support the delivery of more homes overall, including accessible homes.

The government has considered these responses as part of its wider Public Sector Equality Duty assessment under section 149 of the Equality Act 2010.

As set out in the response to Question 217, levy income is not linked to the provision of social housing or local infrastructure, unlike the Community Infrastructure Levy or Section 106 contributions. As such, changes to the levy would not directly reduce the delivery of affordable housing or local services.

Question 221: What do you consider to be the potential economic, competitive and behavioural impacts of possible changes to the levy exemption?

A total of 230 respondents answered Question 221.

Government response

Views focused on economic, competitive and behavioural impacts. Respondents most commonly highlighted potential effects on scheme viability and housing supply, particularly the possibility of reducing pressure on SME developers and supporting delivery on medium-sized sites. Some respondents questioned whether the change would have a material impact or suggested that benefits could accrue to larger developers or landowners. Concerns were also raised about reduced levy revenues.

On competition, many respondents considered that a change could support SME participation by lowering costs and increasing market diversity. A smaller number argued it could disadvantage larger developers. Some respondents noted that in areas with low levels of levy-liable development, local authorities could collect limited revenue relative to administration costs.

Behavioural impacts were also raised. Respondents suggested developers might design schemes to fall just below any threshold, potentially reducing levy receipts and affecting scheme quality. Views on impacts for PBSA development were mixed.

The government has considered these responses and, as set out in the response to Question 217, will not change the threshold at this time. This reflects the need to maintain levy revenues to support building safety work.

The government notes concerns about local authority resourcing and confirms that authorities acting as collecting bodies will be able to recover ongoing costs from MHCLG where these exceed income. As a national tax, all authorities must be able to administer the levy, even where volumes are low.

On behavioural impacts, the government does not expect the introduction of a higher threshold for medium sites to lead to widespread redesign of schemes to avoid liability. The government will monitor behavioural responses as part of the statutory review of the levy to be carried out within three years of its introduction.

Responses for questions 222 and 223 have been grouped.

Question 222: Do you agree with the proposal to extend the Permission in Principle application route to medium development?

A total of 607 respondents answered Question 222. Of those, 24% strongly agreed, 11% partly agreed, 24% neither agreed nor disagreed, 10% partly disagreed and 30% strongly disagreed. This indicates mixed views, with support and opposition broadly balanced.

Question 223: Do you have views about whether there should be changes to the regulatory procedures for these applications, including whether there should be a requirement for a short planning statement?

A total of 332 respondents answered Question 223.

Government response

Support, particularly from developers and professional bodies, focused on extending Permission in Principle to medium-sized development to de-risk sites, reduce costs and increase certainty, especially for SMEs. These respondents also welcomed the use of a planning statement to provide more information. In contrast, most objections came from local authorities and some statutory consultees, who considered the route unsuitable for larger or more complex schemes. They argued that a planning statement may not provide sufficient information to address a wider range of policy matters, and raised concerns that key issues such as flood risk and heritage impacts are not adequately considered at the initial stage.

The government has considered these responses and is minded to proceed with extending Permission in Principle to medium-sized development, subject to further engagement with the sector. The government agrees that this will enable applicants, particularly SME builders, to test the acceptability of development on more sites without the full cost of a planning application. However, it recognises concerns about making decisions on the principle of development for this scale of development in the absence of mitigations, and will explore the issue further and ensure that there are adequate safeguards before making changes to secondary legislation.

Public Sector Equality Duty

Question 224: Do you have any views on the impacts of the above proposals for you or the group or business you represent, and on anyone with a relevant protected characteristic? a) If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how.

A total of 399 respondents answered Question 224.

Question 225: Is there anything that could be done to mitigate any impact identified?

A total of 325 respondents answered Question 225.

Government response

Respondents raised concerns that the proposals could reduce the availability of affordable and accessible housing, disproportionately affecting disabled people, older people, low-income households and other protected groups. Some also argued that weakening protections for green spaces and environmental quality could exacerbate existing environmental and health inequalities, particularly for children, disabled people and deprived communities. As detailed elsewhere in the government response, concerns were raised about potential impacts on Gypsy, Roma and Traveller communities.

Respondents emphasised the importance of fair, accessible and meaningful engagement with all communities, supported by increased local democratic control. There was also strong support for increased investment in workforce capacity, resources and funding for local authorities and statutory bodies to deliver equality-focused planning. Many supported the use of robust Equality and Health Impact Assessments, clearer guidance on the Public Sector Equality Duty, and the application of accessible and inclusive design standards.

The government has considered these responses and acknowledges the concerns raised about potential disproportionate impacts on groups with protected characteristics and vulnerable communities. An Equality Impact Assessment will be published on GOV.UK. This will set out how the proposals have been assessed against the Public Sector Equality Duty and how potential adverse impacts will be mitigated. The government will continue to emphasise the importance of inclusive engagement, robust impact assessment, and clear guidance to support equitable planning outcomes.