

National Planning Policy Framework

Consultation response: Proposed reforms and other changes to the planning system

March 2026



the-ies.org

The Institution
of Environmental
Sciences

Contents

| | |
|----|---|
| 4 | Executive summary |
| 6 | Introductory chapters (Q1) |
| 8 | Plan-making policies (Qs 6, 7, 9, 11, 14, 15, 18, 19, & 20) |
| 14 | Decision-making policies (Qs 21, 22, 24, 29, & 30) |
| 18 | Sustainable development and climate change (Qs 36, 42, 43, & 44) |
| 20 | Land use and green belt policies (Qs 126, 134, & 135) |
| 22 | Well-designed places and transport (Qs 146, 152, 153, & 155) |
| 25 | Pollution, public protection and security (Qs 165, 166, 167, & 168) |
| 32 | Flood risk and final questions (Qs 174, 193, & 194) |

Acknowledgements

Authors: Joseph Lewis

Design: Bea Gilbert & Lucy Rowland

About the Institution of Environmental Sciences

The Institution of Environmental Sciences (the IES) is at the forefront of uniting the environmental sciences around a shared goal: to work with speed, vision and expertise to solve the world's most pressing environmental challenges, together.

As the global professional membership body for environmental scientists, we support a diverse network of professionals all over the world – and at every stage of their education and careers – to connect, develop, progress and inspire.

Registered charity no. 277611

Image credits

Cover – © wajan | Adobe Stock

p. 7 – © Pawel Pajor | Adobe Stock

p. 21 – © Valentinos Loucaides | Adobe Stock

p. 31 – © Pavel Babic | Adobe Stock

p. 33 – © Pressmaster | Adobe Stock

Further information

Find out more about our work to stand up for the voice of science, scientists, and the natural world on our [policy page](#).

Sign up for our [introduction to policy course](#).

Get in touch with Joseph Lewis, IES Head of Policy (joseph@the-ies.org).

Executive summary

The [Institution of Environmental Sciences](#) (the IES) is at the forefront of uniting the environmental sciences around a shared goal: to work with speed, vision and expertise to solve the world's most pressing challenges, together.

As the global professional membership body for environmental scientists, we support a diverse network of professionals all over the world – and at every stage of their education and careers – to connect, develop, progress and inspire.

Key messages

The IES supports the Government's objective to create a planning system that promotes sustainable development while tackling social and economic challenges, like the housing crisis, as well as environmental challenges, like climate change.

That objective will be essential to achieving a future with [thriving people, a healthy economy, and a flourishing environment](#).

We support a transformative approach, and we believe many of the proposed changes contribute towards that goal. Several changes make meaningful contributions

towards a more strategic and holistic approach to planning.

We strongly support the approach to pollution risk taken in policy P3, the broad approach to future planning in policy TR6, and the approach to cross-boundary cooperation in policies PM10 and PM11.

We are concerned that the removal of several smaller discretionary levers adds up to a significant reduction in the flexibility of local authorities to take innovative and ambitious approaches that might make more sense locally, have the ability to promote growth, and which may be essential to meeting national targets. Full details are set out in our response to [question 20](#).

We also have concerns about the approach to air pollution, where national targets are used as proxies in parts of the proposed NPPF for the wider objective of improving air quality and human health. We believe this will lead to unintended consequences and unnecessary risks to human health and the environment. Full details are set out in our response to [question 165](#).

Where the proposals make positive progress, we also believe there are further

opportunities to strengthen those proposals and create a more coherent approach overall. One key opportunity is the inclusion of soil health in several parts of the NPPF and supporting policies.

Why does our perspective matter?

As a professional body, the IES represents the voices of environmental professionals, sharing insights from the front lines of work with the environment.

The interdisciplinary background of the IES family makes it particularly well-placed to address interconnected environmental challenges such as planning, drawing members working in climate change, air quality, land condition, water, impact assessment, nature, and anywhere else where environmental work is underpinned by science.

In particular, the IES's [Environmental Policy Implementation Community \(EPIC\)](#) has expertise on how to deliver environmental policy in practice.

This response was developed with support from the [Institute of Air Quality Management \(IAQM\)](#), EPIC, and the [IES Land Condition Community](#).

Background

At the end of 2025, the Government published proposed reforms to the National Planning Policy Framework (NPPF) and other changes to the planning system.

These proposals were subject to consultation in early 2026. Given the strong expertise of

IES members, we submitted a response to the consultation informed by the views and insights of members working across specialisms.

We also support the [National Contaminated Land Officers' Group \(NCLOG\)](#) to submit its own response.

These proposals are important and come in the context of a range of linked changes in the policy world, including:

- A revised [Environmental Improvement Plan for England \(EIP\)](#)
- The [Planning & Infrastructure Act](#)
- The [Devolution Bill and reforms to local authorities](#)
- England's [Water White Paper](#) and the [Welsh Green Paper for Water](#)
- Previous [reforms to the NPPF](#) in recent years, as well as changes through the [Levelling-Up and Regeneration Act](#) that include the prospect of a shift from Environmental Impact Assessment to [Environmental Outcomes Reports](#)

To keep ahead of the latest policy developments, make sure you are subscribed to [Essential Environment](#) and read our horizon scanning papers on policy developments:

- [Land and nature policy](#)
- [Water policy](#)
- [Clean air policy](#)

If you have any questions about the policy landscape or want to share your perspective, contact Joseph Lewis (joseph@the-ies.org).

Introductory chapters

Soil health and NDMPs

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

If a decision is made on the introduction of statutory National Development Management Policies (NDMPs), the most important goal should be to ensure coherence and alignment between NDMPs and the updated NPPF.

Aligning national planning policy through the NPPF and NDMPs will be critical to achieving both their outcomes in a proportionate and consistent way. It will also be essential for realising the approach taken in policy PM6 and policy DM7.

In that context, ensuring that NDMPs are introduced with reference to the wider objectives of the proposed is essential. The effectiveness of NDMPs could be enhanced by the introduction of an additional NDMP on the protection, management and use of soil as a resource.

This would support an effective implementation of NDMPs as a whole by

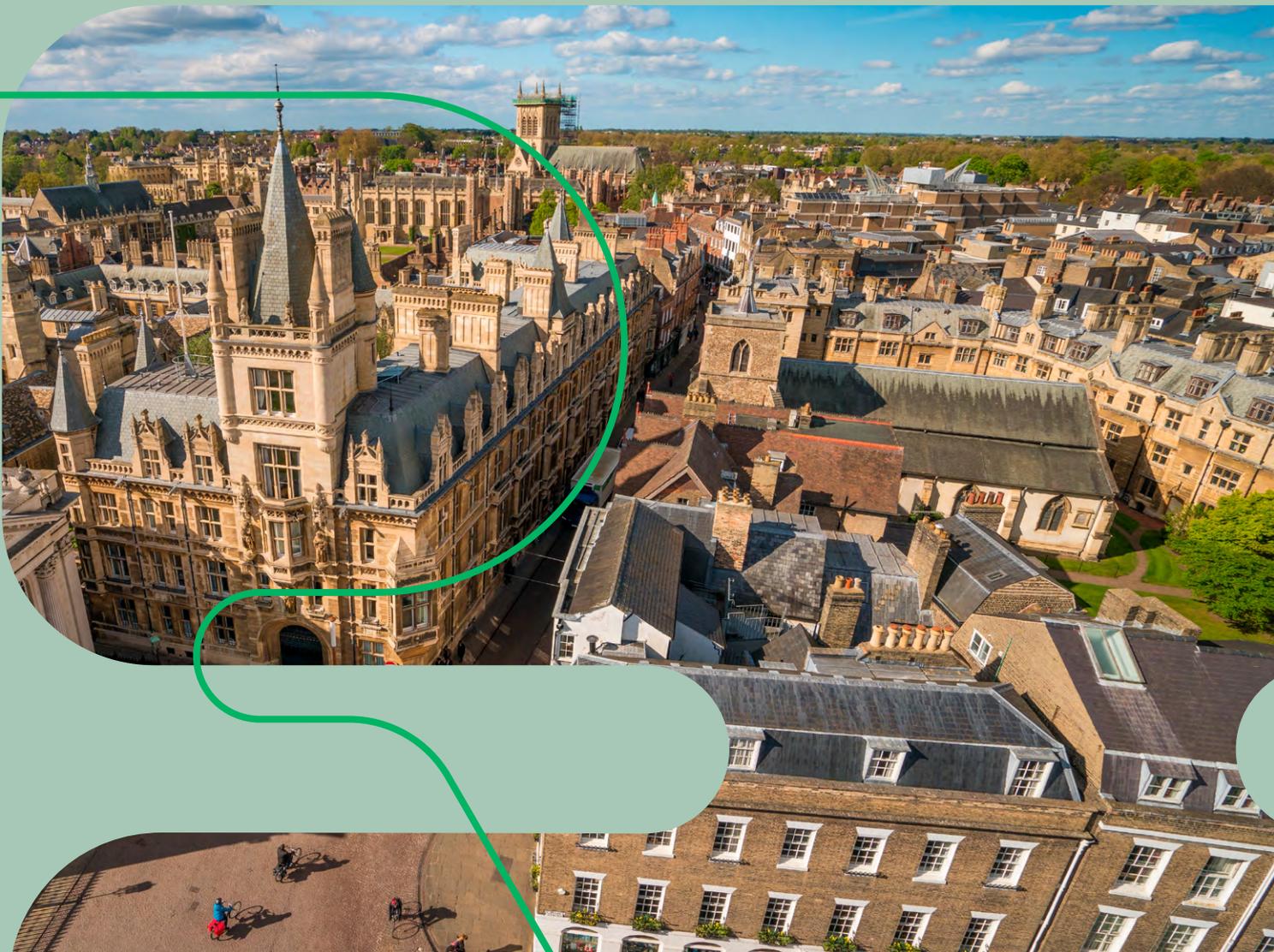
avoiding unintended consequences, such as soils being inappropriately treated as waste, which could contradict the objective of policy CC2.

We provide further information on our position on this in response to question 43.

We therefore suggest that an additional NDMP on soil health management should be introduced to reflect the importance of soil health management and ensure development at all levels encourages safeguarding of soil resources and maximises biodiversity gains through good soil management in the development process.

“Local authorities are losing a number of levers and tools that allow them to apply scrutiny, take innovative approaches, and secure a balanced approach to social, economic, and environmental outcomes.”

– The Institution of Environmental Sciences & Environmental Policy Implementation Community



Plan-making policies

Spatial development

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

Partly agree.

Strategic alignment of spatial development is an important part of the Framework and policy PM1 makes a useful contribution towards that goal.

A more coherent approach would benefit from more explicit links to national and regional level strategic policies, such as Local Nature Recovery Strategies and the forthcoming [Land Use Framework for England](#). Such links are important to ensure that spatial development adds up to a coherent whole, aligned with national objectives and policy.

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?

Partly agree.

Local Plans

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

Partly disagree.

Local Plans are a crucial element of plan-making in particular and of devolution in general. Parts of policy PM2 reflect that need, yet the wider proposals have the potential to undermine the ability of Local Plans to reflect a positive vision set by communities.

Several policies under the proposed NPPF significantly restrict the ability of local authorities to exceed the ambition of (or otherwise deviate from) national policy objectives.

Where a Local Plan developed in line with policy PM2 sought to create a positive vision that required a unique innovative approach or otherwise sought to achieve better outcomes than are required by national policy, these proposals could significantly limit the ability of local authorities to achieve their visions.

This is particularly relevant in the context of some environmental objectives, such as air quality.

Where national objectives are linked to targets or limit levels, these are often set with a pragmatic view to what can be achieved.

Applying a national objective that includes major cities could undermine the ability to pursue more ambitious environmental outcomes in areas which are already compliant with existing targets or regulations, but where air pollution still causes health impacts.

As there are already adequate safeguards against over-reach by local authorities through Local Plans, including under PM2(4), the balance is currently not well struck between alignment with national objectives and empowering local communities to innovate and deliver on the positive vision set through Local Plans.

Throughout this response, we have identified these barriers as they relate to specific policies and proposals, but this particularly relates to restrictions under policies PM6, PM14, and PM15.

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?

Strongly disagree.

The proposed principles set out in PM6(1c) are a significant barrier to the ability of local authorities to carry out their wider functions in line with the needs of the local area.

The restriction against deviation from (or modification of) national decision-making policies would have the effect of reducing the flexibility of local authorities to innovate and act on ambitions beyond the level of national decisions.

The express limitation implied by the language of PM6(1c) removes one lever from the options local authorities have to carry out their functions, making some objectives, particularly environmental and health outcomes, more difficult to achieve.

As identified in response to question 9, this would also significantly restrict the ability for positive visions to be set through Local Plans, as many such visions could not be delivered through the wider set of policies proposed, effectively disempowering local communities from controlling future outcomes.

Land use and cooperation

Question 14: Do you agree with the approach to identifying land for development in PM9?

Partly agree.

In general, the approach to identifying land for development set out in policy PM9 is strong.

It could be strengthened further with a more explicit obligation towards the preferential reuse of previously developed land, particularly by using ‘brownfield first’ language.

Despite a strong drive towards the appropriate and preferred reuse of previously developed land through policy, barriers in uptake remain.

Every effort should be made to strengthen this obligation through policy, so stronger language in policy PM9 would reinforce the delivery of national policy, promoting the effective reuse of previously developed land and supporting sustainable land management and remediation objectives.

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

Strongly agree.

Standard setting

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

Strongly disagree.

The exclusion of construction from standard setting through development plan policies under PM13(1c) is a significant barrier to achieving environmental outcomes in practice.

This is currently a key area for mitigations with substantial impact where local authorities benefit from the ability to set standards, including quantitative standards.

Effective planning policy relies on the ability of local authorities to innovate, particularly on topics which heavily relate to local conditions, such as the environmental impacts of the built environment. It is not sufficient to rely on nationally prescribed standards, as these will often only emerge as the outcome of innovation by local authorities, so the current proposals are not sufficiently flexible.

For example, PM13(1b) would currently serve as a barrier to setting standards around thermal elements (which are covered by Building Regulations Approved Document Part-L) and the number of EV charging points (which are covered by Building Regulations Approved Document Part-S).

This would prevent a local community with specific needs from setting more ambitious standards that align with those needs. Both the thermal transition and transport transition have seen different degrees of progress around the country, so this could unintentionally stall national objectives where certain areas are in a better position to make progress and could do so through locally set standards.

The current proposals would make it challenging in practice for local authorities to push forwards any degree of ambition that exceeds national standards.

We recognise the principle that planning should not typically exceed the standards on the Conservation of Fuel and Power as controlled through the Building Regulations.

This could inappropriately imply that planning can never consider or influence any matters relating to building emissions and energy efficiency, which could serve as a barrier to meeting national energy objectives and the goal of policy CC2(1e) to encourage developments to take advantage of opportunities for low carbon emitting energy systems, including district heat networks and colocation of energy and heat generators.

Some parts of the country operate under different circumstances, such as locations with positive geothermal anomalies where ground source heat pumps are more viable alternatives to air source heat pumps.

While we recognise the importance of policy PM13 in promoting action at scale, it should not serve as a barrier to assisting developers with good practice or recognising local factors and technologies that may affect how standards should be applied. As noted, this could slow action in some places, reducing the overall scale of outcomes.

Standard setting around construction is also increasingly important for addressing some forms of air pollution, such as black carbon, in certain parts of the country where the focus of mitigation is shifting from managing transport emissions (which are beginning to decline as a proportion of emissions sources in these areas) towards handling the environmental impact of the built environment.

The exclusion of the construction of buildings (in PM13(1c)) and matters addressed by Building Regulations (in PM13(1b)) would both be substantial barriers to progress. PM13(1c) could also unintentionally prevent some forms of action on indoor air quality by preventing standard setting on the internal layout of buildings.

Not all local authorities will need to set these standards, nor will all quantitative standards need to apply to construction, but there are circumstances where some local authorities will need the ability to operate with some assurance that standards will be met for construction. In those contexts, standard setting may be necessary.

There may be scenarios where mitigations are clearly understood and can easily be adopted to create positive social and environmental outcomes. Where this is the case, removing the ability to set standards can slow down processes, requiring

assessment regimes that are unnecessary. If good practice is well understood and can be applied rigorously, sectoral guidance and locally set standards can expedite certain developments.

Relevant sectoral guidance includes the [Institute of Air Quality Management's Guidance on the assessment of dust from demolition and construction](#), which offers guidance to developers, consultants, and environmental health practitioners that supports the identification of appropriate mitigation measures.

For guidance to have a meaningful ability to drive these positive and mutually-beneficial outcomes, local authorities need the flexibility to set innovative and ambitious standards.

We recognise that these proposals also come in the context of proposed changes to Design and Placemaking Planning Practice Guidance. Some positive developments proposed in those changes are not sufficiently cross-referenced here.

In particular, the commitment to addressing whole life carbon, embodied carbon, and the broader sustainability of construction through section C2 of the draft Design and Placemaking Planning Practice Guidance could be undermined by the proposed policy PM13(1c).

In general, the proposed changes to the NPPF recognise the truth that no single regulatory regime can guarantee positive outcomes alone, so it would be a mistake to restrict the flexibility of local authorities to set standards that could support the delivery of these objectives.

Proportionality and local authority levers to innovate

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?

Partly disagree.

As noted in response to question 9, policy PM14(2d) and policy PM15(1d) would significantly constrict the levers available to local authorities to engage in innovative or ambitious actions that represent local context or the will of their communities.

Further commentary on the challenges raised by this is given in response to [questions 9](#) and [20](#).

In the context of these policies, this may have the effect of preventing a proportionate assessment of spatial development strategies and local plans in many instances.

The presumption in the paragraphs above could mean that local conditions are not sufficiently considered in the development and assessment of spatial development strategies and local plans.

Such strategies and plans would not be 'sound' and may not meaningfully contribute to the desired local and national objectives.

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?

In its Local Air Quality Management Framework policy guidance, the Government recognises that planning is one of the most effective mechanisms to influence long-term air quality outcomes.

In that context, preserving the ability of air quality officers to influence outcomes through planning should be a high priority for these proposals, which may otherwise risk undermining national objectives for air quality and public health.

As noted throughout our responses to this chapter (and later in our response), we have a number of concerns about the removal of specific levers for local authorities to take innovative approaches in plan-making or otherwise to secure social and environmental objectives.

We want to be clear that the effects of this are not limited to each lever on its own; there is a cumulative effect of many policy levers being lost at once, which we believe is likely to add up to the unintended consequence of disempowering local communities and increasing the risk that environmental outcomes will be harder to achieve in practice.

For example, the concerns raised about policy PM13 relate to our concerns about policy DM3. Policy PM13 shifts the focus of standards away from local standards setting towards relevant national standards.

However, where DM3 limits the scope of when consultees are consulted, air quality

officers and contaminated land officers are likely to be taken out of scope in many instances.

Removing that expertise from the process also means removing the ability to identify relevant national policies and standards in many situations. The result would be that the intention of PM13 would not be realised in practice.

There are many instances where complex areas of national policy require an expert voice as part of the decision-making process.

Policy DM3 limits the scenarios where that expertise is actually part of the process, yet the proposed changes to plan-making, particularly in PM13, operate on the logic that sufficient expertise is available when decisions are made.

This is an example of a general trend across the proposals: local authorities are losing a number of levers and tools that allow them to apply scrutiny, take innovative approaches, and secure a balanced approach to social, economic, and environmental outcomes.

The full unintended consequences of how these levers (and their loss) interact are not properly reflected in the proposals.

Decision-making policies

Decision-making principles

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

Partly agree.

The principles in policy DM1 are broadly appropriate.

Policy DM1(2) emphasises that proposals should be supported by “the minimum necessary information requirements to enable a decision”.

This is an important principle but is potentially jeopardised by other proposals relating to decision-making, particularly the implications of DM3. We provide more details on our concerns about the impact of DM3 on evidence-informed decisions in response to [question 24](#).

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

Partly agree.

The framework in DM2 is broadly appropriate and proportionate. In particular, we welcome the inclusion of ground conditions within

Annex C, which will help to identify and assess potential land contamination risks at an early stage.

However, the condition in policy DM2(2) that “local validation lists should only include additional information requirements if there is a policy in the development plan requiring specific further assessment” limits the flexibility available to local authorities where additional information would be valuable or necessary for decision-making.

This is compounded by the proposals under policy PM15, which could have the effect of restricting the content of the development plan.

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

Strongly disagree.

The principles in policy DM3 would have the effect of significantly reducing the evidence used for decision-making, likely leading to unintended consequences and making it harder to achieve national and local policy objectives.

Specifically, paragraph DM3(1d) states that planning authorities should “consult

statutory or internal consultees only where it is necessary to do so”.

This proposal is currently highly ambiguous and open to interpretation, so it would seriously undermine regulatory oversight, particularly in the context of the intense resource and time pressures under which planning officers and decision-makers operate.

The likely outcome of ambiguity about when consultees need to be consulted would be a lack of consultation in most cases and the exclusion of expert input from statutory consultees and internal consultees like air quality of contaminated land officers within local authorities.

It is already the case that some issues never reach these teams within local authorities, so this would shift the balance even further away from an informed and proportionate approach to decision-making.

Currently, issues around air quality and contaminated land can be picked up at Planning Committees. If internal consultees are excluded from the consultation process, the ability to raise these issues will be lost.

Planning authorities will not always be equipped to know whether this expertise is needed before consulting an internal consultee. Under constrained resources, the practical implication of policy DM3 is that these experts are unlikely to be consulted, so the risks they could have identified will not be addressed.

There are several negative impacts that could arise from this.

Unidentified issues with contaminated land, air quality, or other environmental risks

could negatively affect the health and wellbeing of local communities. These issues are often part of complex systems with unintuitive or cumulative impacts on health and environmental outcomes, so cannot always be reasonably identified by planning authorities until consultation has taken place.

If these issues are identified later in the process, it could significantly slow down development and duplicate effort and expenditure.

Early engagement helps to identify potential constraints, risks, and required mitigations so that they can be built in from the outset. If action is delayed until later in the process or not identified, it may cost more, be less effective, cause delays, and increase the risk to public health and the environment.

The ability to pursue potential co-benefits from decisions could also be lost, as opportunities that clearly align with (or which are called for under) national and local policies may not be identified without consulting internal consultees that have relevant expertise.

This could serve as a barrier to meeting obligations under policies like the Air Quality Strategy for England and the Local Air Quality Management regime, as well as other obligations under the NPPF, such as addressing **pollution, public protection and security**.

In general, excluding these consultees reducing the certainty associated with decision-making and could make expectations less clear and consistent between local planning authorities, leading to a high degree of confusion during transitional arrangements.

We support the recommendation made by the [National Contaminated Land Officers' Group](#) (NCLOG, part of the IES family) that the word “necessary” in DM3(1d) is given a specific, clear, and appropriate definition within the NPPF.

NCLOG’s suggested wording is that the circumstances should be “necessary as guided by other relevant policies within the NPPF, for example where there may be potential impacts on public health.”

This amendment would retain the intention of the proposals, reducing the degree of unnecessary consultation, while still ensuring other relevant policies are sufficiently considered that statutory and internal consultees can be brought into the decision-making process when it is clear they need to be, or when circumstances are sufficiently unclear that a precautionary approach to consultation is preferable.

If these risks are not addressed, further action will be necessary to ensure that decision-makers are properly equipped with the breadth of information and policy awareness that they can make sound decisions, even in the absence of input from a range of statutory and internal consultees.

It should also be noted that land contamination is not currently a statutory consultation matter. While beyond the scope of policy DM3, this should be remedied, as the current non-statutory status of land contamination consultation is not reflective of the strong public and media interest in these matters over the last 12 months.

Given the substantial human health risks and links to policy objectives around

controlled waters and long-term land use, contaminated land should be brought onto the same policy positioning as comparable issues.

Planning conditions and other regimes

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?

Partly disagree.

The constraint introduced in policy DM6(3) that “where national model conditions are relevant to the development, they should be used unless there are strong reasons for using a different condition” is another limitation on the flexibility available to local authorities.

As with policy DM3, policy DM6 introduces a degree of uncertainty, in this case around what reasons constitute “strong reasons”.

In the scenario where there were strong reasons for using a different condition, this ambiguity would have the effect of inviting challenges, potentially slowing the process and making it less certain.

While the risks associated with this constraint are limited in isolation, they represent an overall reduction in flexibility that poses a more substantial risk, as identified in response to [question 20](#).

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

Strongly agree.

A coherent approach to regulation is essential, so policy DM7 provides an important clarification that will help to improve the effectiveness and appropriateness of decisions.

It is appropriate that policy DM7 requires clear evidence that other regimes are not operating effectively, which supports a proportional and evidence-informed approach.

This does raise a potential inconsistency with policy DM3, particularly DM3(1d), as the ambiguity identified in response to [question 24](#) may undermine the intention of DM7 to establish a clear and coherent evidence for decisions.

In the absence of unidentified evidence from statutory and internal consultees, planning authorities may lack sufficient information for this to function as intended in practice.

Sustainable development and climate change

Sustainable development

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

Partly agree.

We strongly support the need for a presumption in favour of sustainable development, which should be robust and well-supported. However, it must remain a presumption in favour of sustainable development and not inadvertently become an excuse for unsustainable development.

The presumption must be reflected in practice as well as in principle, so it should be reflected across the approach taken to planning and land use, including beyond the NPPF through policies like the [Land Use Framework for England](#).

Sustainable development requires a more holistic approach so cannot be achieved without linking the NPPF to the wider range of policy outcomes that are necessary for creating a country with thriving people, a healthy economy, and a flourishing environment.

Policy S3(1c) states that “development proposals that accord with an up-to-date development plan and also the decision-making policies in this Framework should be approved without delay”.

This risks unnecessarily restricting the flexibility of local authorities to properly consider evidence and ensure that proposed developments are, in fact, sustainable.

The ambiguous and colloquial use of “without delay” should be removed from the NPPF.

Climate change in planning

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

Partly agree.

Question 43: Do you agree with the approach to mitigating climate change through planning decisions in policy CC2?

Partly agree.

The overall approach to mitigating climate change set out in policy CC2 is good.

This is another area where sectoral guidance can play a strong supporting role in ensuring appropriate consideration of climate change mitigation alongside other considerations.

The Environmental Policy Implementation Community's Guide for Local Authorities on [Integrating Action on Air Quality & Climate Change](#) is a strong evidence-based tool for supporting these decisions. Improving the promotion and availability of these types of guidance would be a strong step towards enhancing the opportunities raised by policy CC2.

The approach could also be improved through more explicit and stronger recognition of the role of sustainable soils management in supporting climate mitigation (and adaptation).

Sustainable soils management can reduce carbon emissions associated with construction and reduce the waste of natural resources.

Efficient use of soil resources is especially important in the context of soil erosion, which represents a risk to climate mitigation and adaptation, as well as other national objectives like food security.

To support this, CC2 could place stronger emphasis on sustainable soils management, driving the inclusion of relevant policies in Local Plans and reinforcing the importance of soil health in decision-making.

The current approach does not sufficiently reflect established land management approaches which could increase the opportunity for reuse and decrease the volume of material resources sent to landfill.

In particular, paragraph CC2(1d) is currently too passive. Rather than only taking advantage of opportunities around non-contaminated soil, it should better reflect the full range of established risk-based approaches to land management.

Through risk-based and quality-assured approaches, it is possible to reliably enable the safe and sustainable reuse of natural resources while still safeguarding human health and environmental outcomes.

We support [NCLOG's](#) recommendation to amend paragraph CC2(1d) to read: "Take advantage of opportunities to re-use existing structures and materials, including by re-using suitable excavated soil and hardcore within the site, and facilitating transfers between donor and receiver sites using quality-assured transfer mechanisms (such as the Soil Passport Schemes)."

Question 44: Do you agree with the approach to climate change adaptation through planning decisions in policy CC3?

Partly agree.

The overall approach to adapting to climate change set out in policy CC3 is good. It could be improved through the suggestions made in response to [question 43](#) as the reuse of natural resources also benefits resilience against the impacts of climate change.

Additionally, where policy CC3 refers to policy F8 and the use of Sustainable Drainage Systems, both policies should be strengthened to explicitly mandate their use.

Land use and green belt policies

Well-connected areas

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

Yes.

Resources and coherence

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

Neither agree nor disagree.

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

The expectations in policy GB5 are likely to face significant delivery challenges. Local authorities are seriously constrained in their resources, expertise, and capacity, so will need to be well-resourced to deliver, particularly in the short-term.

Policy GB5 would also benefit from more explicit and robust links to other policies, including the forthcoming [Land Use Framework for England](#) and [Local Nature](#)

[Recovery Strategies](#), as increased coherence between these policies will be essential to making these expectations deliverable in practice.

“Air quality targets are a proxy. The NPPF should align with a more holistic objective of reducing air pollution to improve health outcomes and the effects of air quality on the human and natural environment.”

The Institution of Environmental Sciences and
the Institute of Air Quality Management



Well-designed places & sustainable transport

Placemaking

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

Partly agree.

Policy DP1 provides a good set of criteria for how development plans should deliver high quality design and placemaking outcomes. It could be strengthened with greater clarity on its scope and specific details on how to deliver these outcomes in practice.

It should be noted that policy DP1 operates in the context of other proposed changes, including those to PM13, which may limit the scope of development plans.

To maximise the clarity of policy DP1, it would be beneficial to highlight a holistic range of desirable design outcomes that contribute to delivering high quality design, including sustainability, good acoustic design, and other environmental outcomes.

Clarity on how developments plans could deliver these outcomes could be strengthened by reinforcing the value of

adopting standards and guidance, such as Professional Practice Guidance on Planning and Noise.

Transport connectivity

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

Partly agree.

We strongly support the shift towards locating development in sustainable locations and policy TR3 makes good progress towards that objective. The policy includes positive changes around traffic and the strong push towards mitigating adverse impacts is welcome.

TR3(1c) is also welcome as it provides a potential mechanism to help secure contributions to connectivity and environmental outcomes more broadly, which would otherwise be lacking.

This is a substantial step forward from the current NPPF, not only providing a connectivity tool but also opening a route

to quantifying future net environmental gains like air pollution, which has significant potential benefits for public health.

There is not an explicit threshold for when net environmental gains, such as for air quality, should be secured, beyond the recognition in TR3(1d) that opportunities for enhanced connectivity should be taken when they “can be supported by the development”.

We suggest adding that, for appropriate environmental gains such as addressing air pollution, the net reduction (or gain) should be used to derive a damage cost estimate over the lifetime of the development. The proposals do not sufficiently account for lifetime impacts.

For air pollution specifically, the NPPF should have regard to the Air Quality Strategy for England, which emphasises that “design-stage emission prevention means influencing the design of a scheme at an early stage, so the minimum amount of pollution is emitted during the scheme’s life.”

Such an approach has the potential for many benefits.

Beyond providing actionable information for decision-making and better integrating action on air quality and transport, it could also form the basis of a funding mechanism to be held in reserve by the local highways authority to deliver wider Local Cycling and Walking Infrastructure Plan and air quality improvements, in line with the approach to the Nature Restoration Fund and Environmental Delivery Plans.

This would also align with policy TR6 and the recognition that “all reasonable future

scenarios should be considered”, as it maximises the opportunity to take a precautionary approach to decisions.

The [Environmental Policy Implementation Community](#) (EPIC) has created a national working group that is working with the [Institute of Air Quality Management](#) (IAQM) to prepare new Air Quality Guidance for Planning.

If additional guidance is necessary to help determine when net contributions are required, and critically how, the group would be happy to draft guidance and present it to the MHCLG before its adoption.

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?

Partly agree.

Policy TR4 makes a significant step towards effectively integrated transport considerations into the process of creating well-designed places.

The proposal to ensure transport visions are informed by the new national design guidance is welcome, as long as the guidance aligns with [Active Travel England’s toolkit](#) approach and has clear minimum requirements of active travel measures, such as:

- High-quality continuous walking connections from sites to access local services including schools and shops
- Cycleway connections to local centres, schools, employment centres, public transport hubs and leisure attractions, compliant with cycle infrastructure

design LTN 1/20 with a view to preventing conflicts where cyclists share the carriageway with high traffic volumes

- For larger developments, high-quality cycle routes with a minimum density of 250m between key routes
- LTN 1/20 compliant cycle parking within developments, as well as consideration of adequate off-site provisions, particularly at main transport interchanges with secure cycle hubs with remote or controlled access, as well as secure bicycle stands with CCTV and built-in best practice locking systems
- Accessible public transport stations or stops within 400m or five minutes walking distance of the site
- The need to develop strategic active travel connections where existing provision is non-existent or below expected standards

To ensure the approach under policy TR4 is sufficient, it should be necessary that any issue where transport visions do not sufficiently align with [Active Travel England's toolkit approach](#) is addressed and that necessary mitigations are secured under policy TR3(1c) to ensure a net reduction in air pollution.

Transport planning

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?

Strongly agree.

The proposed wording in policy TR6 is clear and useful.

It is particularly helpful that policy TR6 specifies that “all reasonable future scenarios should be considered” as this will be essential to realising a vision-led approach to transport. In the context of increasingly complex outcomes driven by climate change and other social and environmental factors, a strong precautionary approach is essential.

To maximise the strength of policy TR6, policy TR3 should be brought more clearly into alignment with this approach, which would increase the coherence of the policies overall and increase the likelihood that positive visions for transport will be achievable in practice.

Pollution, public protection and security

Risk identification

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

Partly agree.

Chapter 17 on pollution, public protection and security is generally a strong chapter and its approach to ensuring appropriate risk management around pollution is welcome. There are several ways it could be improved, which is also true of policy P1.

For the NPPF to meaningfully address the health impacts of air pollution, it must overcome the distinction between policy targets and actual health impacts.

There is a significant difference between air quality compliance and improving health outcomes linked to air quality, especially in terms of national targets and objectives, which are the focus on policy P1(1c) and several other parts of Chapter 17.

When air quality objectives are set at a national level, they are designed to be pragmatic and achievable, with reference to the country as a whole.

This is especially true of the air quality targets set under the [Environment Act 2021](#).

These targets are different in purpose from international limit levels, such as the [World Health Organization's Air Quality Guidelines](#), which are designed to provide recommendations that guide countries towards better public health outcomes. National targets are intended to produce accountability and support actionable policy development, so are necessarily more pragmatic and focused on policy, rather than science.

As a result, England's national air quality targets are set at a level higher than the evidence suggests is safe for human health. Further, evidence suggests that some pollutants such as PM2.5 can have harmful effects on human health at much lower concentrations than national targets.

Where policy P1(1c) says that development plans should identify opportunities to "contribute to compliance", that is still one step removed from contributing to health outcomes, which seems misaligned with the intention of Chapter 17.

In general, air quality targets are a proxy to support action towards improving air quality

and achieving health outcomes. Therefore, the NPPF should not create a proxy to that proxy, it should align with a more holistic objective of reducing air pollution to improve health outcomes and the effects of air quality on the human and natural environment.

Beyond the specific disconnect between air targets and health outcomes, policy P1 is a strong basis for identifying and addressing risks.

In particular, P1(1b) is an appropriate and proportionate safeguard, and P1(1c) provides a strong mechanism for identifying and delivering co-benefits. These beneficial mechanisms will operate in the context of the proposals as a whole, so need to be understood in the context of significant shifts of flexibility and discretion away from local authorities, which may produce a degree of ambiguity around how much these opportunities can be taken up in practice through decision-making and Local Plan policies.

Policy P1(1b) includes the first steps towards strong proposals around land use. It is important that land is suitable for its proposed use and that it considers environmental and public health impacts, so more should be done to ensure these proposals are as effective and holistic as possible.

We support two recommendations from others on policy P1(1b). The first is to add a new criterion under paragraph 1(b): “Allocate land for development where: (v) opportunities can be taken to provide spaces for community growing.”

This change would support clean, healthy, liveable places by ensuring that a full range

of green infrastructure options are prioritised, beyond passive green infrastructure which has traditionally been favoured by planning policy.

Community growing has positive benefits for food security, human health, and wellbeing, so direct recognition of allotments, community gardens, and other ways to engage with land will reduce the risk that these spaces are excluded from urban development schemes.

We also support **NCLOG**'s recommendation that P1(1c) should be amended as follows to include opportunities to contribute to nature recovery: “Actively assess any wider opportunities to reduce air, water, soil and noise pollution, and improve nature recovery, and contribute to compliance with national and local environmental targets and objectives, through the spatial strategy and policies for specific parts of the plan area (such as by identifying opportunities for strategic nature-based solutions).”

Policy P1 could also be strengthened by emphasising the importance of a brownfield first approach and strengthening the commitment in P1(1c) around soil health.

The latter currently extends only to reducing soil pollution but could be strengthened by including more proactive opportunities to actively improve soil health.

Finally, the inclusion of noise pollution in policy P1 is very welcome. Identifying opportunities to reduce noise pollution is an important priority and often not fully addressed through planning policy.

This could be further supported by a holistic approach to good design in line with policy DP1, so the adoption of benchmarks

from professional practice guidance would help to deliver the objectives identified in policy P1.

This approach is outlined in further detail in response to [question 146](#).

Contaminated land

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

Yes.

We strongly support the use of guidance to enable better decision-making on contaminated land, as it will improve consistency, effectiveness, and decision-making speed across local authorities, leading to a more proportionate system that increases confidence in delivery.

Where guidance currently exists, there are specific gaps where guidance needs to be clarified or updated. These updates should be made in collaboration with local regulator representative groups, such as [NCLOG](#).

Additionally, the delivery of guidance currently falls heavily on local regulators who are operating within heightened resource constraints. Tools and guidance should be delivered with recognition of that context, so they need to be accessible, and resources should be available for their uptake.

The first gap is around guidance on Per- and Polyfluoroalkyl substances (PFAS) for local authorities and planning authorities. PFAS related risks are an expected consideration in planning and regulatory decisions, yet there is insufficient guidance available on which sites to investigate, which substances within PFAS should be

analysed, and how to assess and remediate PFAS risks. The latter in particular is a rapidly evolving topic. Guidance is needed to fill this gap, and it should align with the new PFAS Plan.

Filling this gap is a high priority for outcomes around land contamination and is important for carrying out decisions effectively and cost efficiently.

The second gap relates to technical guidance. There is a wide body of technical guidance that is not currently accessible to those who need it, as some privately produced guidance is not freely available and too expensive for local authority officers with constricted resources.

Technical materials that are accessible are often not sufficiently detailed or technical in nature. There is a clear need for nationally endorsed and publicly, freely available guidance that supports consistent and proportionate regulatory decisions on the technical aspects of land contamination.

Filling this gap is a high priority as the absence of these materials leads to decision-making delays and inconsistencies between local authorities.

This second gap relates to the proposals in policy P2(3) on Ground Conditions. The paragraph currently includes a degree of ambiguity that could be improved by explicitly referencing the Environment Agency's [Land Contamination Risk Management \(LCRM\)](#) definitions, creating a more consistent and clear approach, which would also improve the alignment of approaches across local authorities with existing LCRM guidance.

Therefore, we support the recommendation of NCLOG that this paragraph should be

expanded as follows: “Appropriate site assessment information, prepared by a competent person, should be available to inform the assessments in accordance with the EA LCRM process. This may require site investigation in line with good practice.”

Managing pollution

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?

Partly agree.

The criteria set out in policy P3 have the potential to be a significant step forwards for securing acceptable living conditions and managing pollution. However, there are points of ambiguity that need to be addressed to maximise the potential of the policy.

Firstly, the relationship between paragraph P3(1b) and P3 (2b) is not fully clear. Paragraph P3(1b) sets out a strong, positive, and holistic approach to securing real outcomes for healthy living conditions, addressing factors like air and noise pollution directly.

This approach overcomes the concerns we raised about policy P1 in response to [question 165](#).

However, paragraph P3(2b) takes the opposite approach, specifically tying requirements for development proposals to contributions to limit values and national targets.

This approach suffers from the same problem identified in response to question 165: it does not recognise the disparity between policy objectives and actual outcomes.

This gap leaves ambiguity that could risk a compliance-only approach where only contributions to targets themselves are sought, rather than the full list of outcomes for health and wellbeing in P3(1b).

This would undermine that paragraph, as well as the objectives of policy HC1. It also creates uncertainty which would lead to inconsistency and put the burden on local authorities to resolve conflicts, further draining stretched resources. This ambiguity could be resolved by clarifying that both paragraphs 1 and 2 are necessary tests for developments.

Similarly, policy P3 does not provide a specific minimum level of air pollution to avoid. Paragraph P3(1b) sets the goal as avoiding an “unacceptable adverse effect” from pollution, which is not the same as a minimum level of pollution or of removing adverse health effects.

The new text in paragraph P3(2b) requiring contributions to national PM2.5 targets is a positive step towards addressing this. However, as noted in response to question 165, evidence suggests that certain pollutants, including PM2.5, can have significant harmful health effects at lower concentrations than national targets.

This could be addressed through the implementation of [Defra’s Interim Planning Guidance on PM2.5 Targets](#), which will necessarily involve updates to related guidance for assessment, such as guidance on Mineral Sites, Biomass, and Construction and Demolition.

In general, the objectives of policy P3 could be supported through a practice-based approach to air quality management.

Air quality management practitioners have an immediate ability to manage pollution and affect holistic health outcomes in a way that is relevant to local context.

The [Institute of Air Quality Management](#) is currently working on updating its sector leading planning guidance to refocus the balance from ‘compliance only’ towards an approach to management that integrates health outcomes. We would be happy to share outcomes and lessons from this process if they are useful in supporting a more holistic approach.

Additionally, we suggest amending policy P3(2a), replacing the parentheses “(such as through traffic and travel management or improved external lighting)” with “as set out in local Air Quality Strategies”.

This would reduce ambiguity and ensure a more coherent policy approach that represents relevant objectives in a given context.

Secondly, while the inclusion of noise pollution is both welcome and important, paragraph P3(2c) would benefit from further clarity on how adverse effects of noise exposure should be defined.

When specifying a standard, regard should be had to noise control criteria that are now covered by Permitted Development Rights, such as criteria for air source heat pumps where a single installation would meet the requirements of the Microgeneration Certification Scheme MCS 02(a) under the Town & Country (General Permitted Development) Order (England) 2025.

There is also a risk associated with the move away from using the Lowest Observed Adverse Effect (LOAEL) and Significant

Observed Adverse Effect (SOAEL) as a basis for achieving levels of noise pollution without adverse effects.

This approach recognises the difference in safe levels between different noise sources and that there are health impacts associated with noise below a significant level that can impact on quality of life.

The proposals in P3(2c) shift policy towards a less nuanced approach which may introduce environmental health risks where the observed adverse effect of noise pollution is less than significant, therefore falling outside the scope of policy P3(2c), yet still having an observable adverse effect.

A slightly more balanced approach could be taken here. It would also benefit from the same clarification noted above in the context of air quality, which would assert the importance of avoiding noise exposure more generally.

Thirdly, the inclusion in paragraph P3(2a) that “consideration should be given to the cumulative effect of pollution from multiple sources” is a very welcome one.

This is a fundamental aspect of managing the risks associated with pollution. In many cases, quantifying and understanding these cumulative risks will be challenging, so sufficient guidance and resources need to be available to facilitate this.

The consideration of cumulative effects would also be made more effective by including land contamination within the overall approach to managing pollution set in policy P3.

Land contamination has relevant risks to human health and is often a source for

cumulative risks in particular, such as benzene or vapour migration from a contaminated site.

Including land contamination in policy P3 would be prudent, consistent with the rest of the policy, and would increase the capacity to consider cumulative effects under P3(2a).

Fourthly, the inclusion of paragraph P3(3) is incredibly welcome.

It is one of the strongest elements of the proposed NPPF and strikes a good balance between providing sufficient support to properly consider pollution risks and retaining a proportionate approach to planning policy that does not add new burdens to developers.

This is vital for managing pollutants such as PM2.5 where the failure of one regime can leave levels of pollution that pose inherent risks to human health. Paragraph P3(3) achieves this without duplication or double regulation, reflecting the goals of policy DM7.

This is a pragmatic and deeply needed policy approach that correctly recognises the limitations of regulatory measures to control impacts while still maximising the potential to protect the public.

This paragraph should be retained in full in the final version of the NPPF.

Its implementation could be strengthened through supporting guidance that outlines case studies or examples of what this looks like in practice.

Finally, there is an element of environmental justice that could be better addressed through policy P3. The distributional effects

of inequalities arising from air pollution are beginning to be well understood but are not fully reflected in policy.

Where the focus of policy P3 tends towards occupiers and users, there are risks to justice emerging for those living in adjacent properties or otherwise living in communities affected by nearby developments.

Paragraphs P3(1c) and (2c) capture this wider consideration to some extent, but the scope is constrained and less substantial, creating a risk that these stakeholders are given less consideration, even when they are likely to be significantly affected.

We recognise that there are natural trade-offs made during the development process, so it will not always be possible to distribute environmental risks completely equally. However, policy P3 could be strengthened to ensure that these questions of air quality justice are at least considered.

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

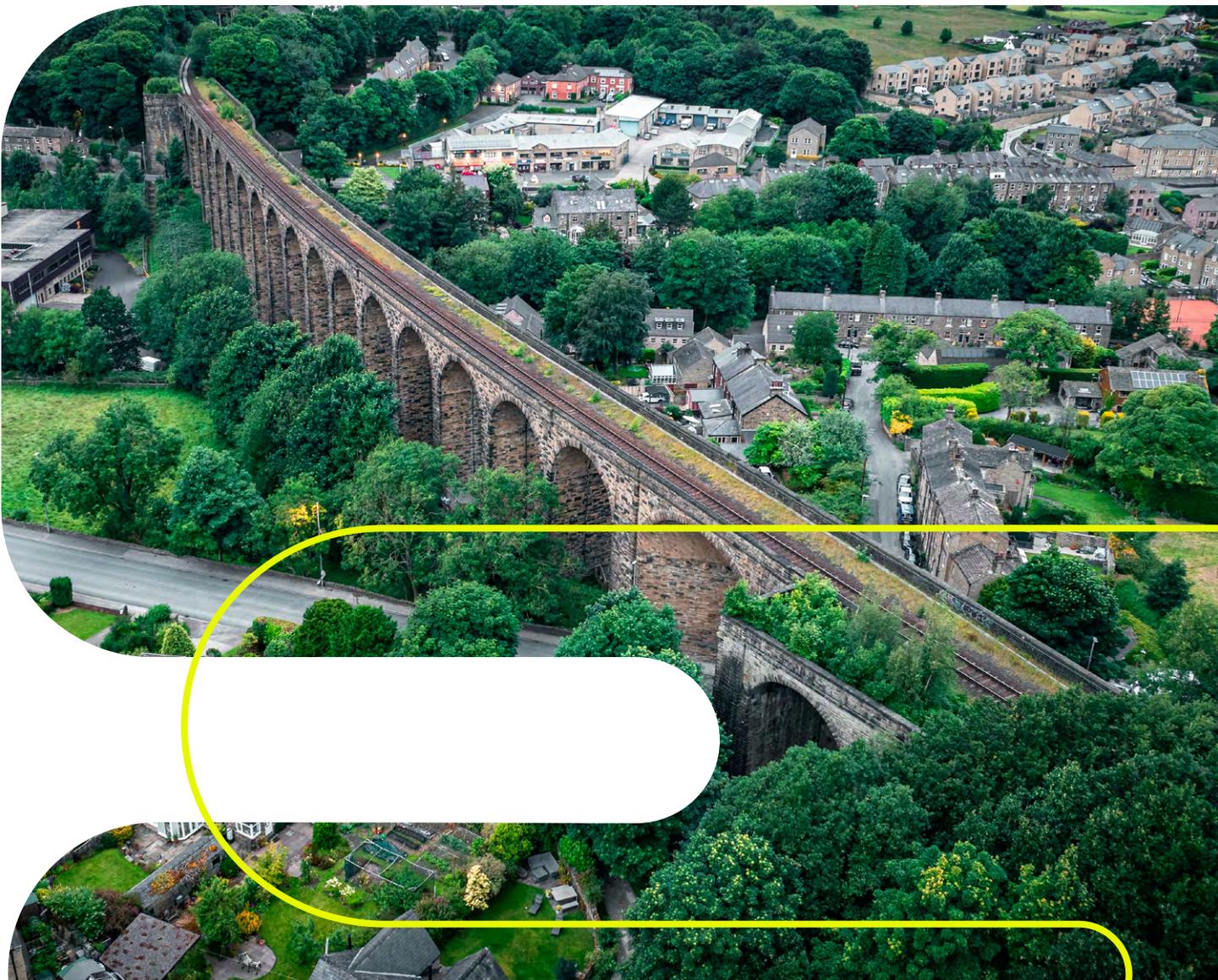
Strongly agree.

Policy P4 provides a strong, proportionate, and sufficient level of detail in how the agent of change principles should be applied.

This is an important principle in the wider context of the Prevention Principle under the [Environmental Principles Policy Statement](#). This is critical for achieving environmental outcomes and is especially important in the context of noise pollution, where appropriate mitigations need to be put in place by the agent of change to avoid negative outcomes to health and wellbeing.

The Licensing Regime is already being reviewed and presents another opportunity to embed this approach and align policies for greater coherence.

Where local licensing authorities believe it is appropriate or necessary, they are in a position to incorporate the principle into their statements of licensing policy for an embedded approach.



Flood risk and final questions

Flood risk

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?

Strongly agree.

Impact Assessment

Question 193: Do you have any further thoughts on the policies outlined in this consultation?

There are uncertainties around these proposals that remain unresolved, due to a lack of consistent policy direction around the future of Environmental Impact Assessment (EIA) and the transition to [Environmental Outcomes Reports](#) (EORs).

It would be beneficial to have a definitive and comprehensive statement on the current state of proposals and in what form they will be taken forward.

Given the strong alignment between the objectives of the proposed changes to the NPPF and many of the impacts or outcomes

associated with the EIA and EORs regimes, this would help to clarify how these policies will be embedded across a wider implementation system.

There is an urgent need for certainty around how the future of these regimes fits into the wider context of ongoing policy developments.

Annexes to the NPPF

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?

Neither agree nor disagree.

The introductory paragraphs to Annex A, particularly paragraph 2, imply a further restriction of discretionary levers for local authorities, compounding the new restrictions on flexibility, discretion, and innovation.

In the context of Annex A, this is not unexpected but should be read in the context of the concerns about the cumulative effects of restricted local discretion raised in response to [question 20](#).

“Different places have different needs. Local authorities need the power to innovate and the flexibility to act. The NPPF must empower communities to pursue ambitious environmental action.”

– Joseph Lewis, IES Head of Policy

