

NPPF and Planning Reform

Briefing for CIAT members and affiliates

Applicability: England only (planning policy and legislation differ in Wales, Scotland and Northern Ireland).

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1. On 17 August 2026, the Government published the outcomes of its consultation on reform of the National Planning Policy Framework (NPPF), alongside the resulting NPPF for England, which (while covering much of the same ground as its precursors), has been substantially redrafted and revised. This builds on a range of recent reforms to local planning, which aim to support the delivery of 1.5 million new homes over this parliament.
2. This briefing provides a summary of the key changes introduced through the NPPF and wider reforms. CIAT welcomes feedback from members and affiliates on the reforms to planning. To share your reflections to inform future CIAT activity, please email externalaffairs@ciat.global.

NPPF Reform - structural and drafting changes

3. The revised National Planning Policy Framework (NPPF) applies from 17 August 2026. Existing development plan policies which are “materially inconsistent” with national decision-making policies in the new NPPF should be given “very limited weight”, but other existing plans should not be given reduced weight.
4. The first major changes to the NPPF are structural. Each chapter of the Framework now clearly identifies which policies are relevant to plan-making and which to decision-making, and a new numbering scheme for policies, which links to their overall theme, has been developed. Annexes have been added that provide guidance and methodologies for housing calculations, Green Belt assessments and flood management.
5. CIAT welcomes these useability and navigation changes (though a summary table of plan-making and decision-making policies would have been a useful addition). For members and affiliates working on planning applications, the clearer distinction between planning and decision-making policies should make it easier to identify the national policies directly relevant to the outcome of a proposal.
6. The new NPPF standardises terminology to avoid implying a hierarchy of importance for different policies where no such hierarchy is intended. Despite representations from CIAT and others, Government has opted not to provide guidance on the relative importance of different planning policies, concluding that this is a matter for local decision-makers.

NPPF Reform – plan-making and decision-making

7. In terms of plan-making processes, the NPPF now provides a schema for developing Spatial Development Strategies (SDSs), which were introduced through Part 1A of the Planning and Compulsory Purchase Act 2004 (as amended). SDSs provide an important framework to address issues which have implications across local boundaries, such as large-scale housing development, economic growth, infrastructure, and environmental priorities. These strategies will need to be updated at least every ten years (sooner if there is a significant change in local housing need). Where SDSs and local plans conflict, Government

has clarified that whichever plan is most recent will take precedence, providing a means to adjudicate such conflicts (and incentivising timely plan updates).

8. A particular concern among consultation respondents (including CIAT), was how far local planning authorities can go beyond national requirements. Initial proposals had limited the scope for local plans to set more ambitious standards to tackle climate change, for example. The final NPPF confirms that plans will have the flexibility to go beyond national policies, so long as they are justified with evidence, and are not “inconsistent” with national policies. Planners should not set requirements which cover matters addressed by Building Regulations, except regarding accessibility, water or energy efficiency.
9. In regard to the provision of information to support planning decision-making, the NPPF now includes a list of information to be included in applications, with additional information requirements only permitted where this is necessary to assess the proposal against specific policies. The NPPF notes that information requirements should be proportionate. This policy is welcome, as it should reduce the burden of the planning process (although the Institute had hoped that Government would provide detailed guidance on information requirements, in order to support national consistency).
10. The revised NPPF seeks to minimise the scope for unnecessary negotiation of developer contributions, encouraging clarity and limiting negotiation to situations where viability assessment demonstrates that it would not be possible for development to proceed on a policy compliant basis. CIAT welcomes these changes, but continues to advocate for a consistent, simplified approach to developer contributions, which reduces uncertainty and accelerates planning. Positively, the Government has committed to a “detailed review of the statutory framework for amending planning obligations”.

NPPF Reform – key policy changes

11. The new NPPF significantly strengthens the presumption in favour of sustainable development, such that it applies even where a local plan is in place. In urban areas, this means development should only be refused where there is a “substantial adverse impact” on land allocations for certain protected purposes (including uses identified in the local plan, green space and biodiversity, burial and flood management), where development would breach one of the national policies laid out in the NPPF, or where it conflicts with an up-to-date local plan with sufficient local land supply. In rural areas, the presumption means certain developments should be approved (including agriculture and rural business uses, infill, reuse and redevelopment, development around well-connected rail stations, or development where the local plan cannot demonstrate a 5-year land supply).
12. CIAT supports the presumption in favour of sustainable development, which provides greater certainty and accelerates development. However, the Institute notes that a more holistic, robust definition of sustainable development (e.g., the Brundtland definition of sustainability or the UN Sustainable Development Goals) would strengthen the policy.
13. As regards climate change, having confirmed that local planning authorities have flexibility to go beyond national policies, the NPPF encourages planners to consider climate adaptation and mitigation in plans and decision-making (though without directly encouraging specific approaches, such as nature-based solutions, circular economy approaches or whole-life carbon assessment). Planning Practice Guidance will be updated to support clarity and consistency in the use of whole-life carbon assessment. CIAT continues to support the inclusion of whole-life carbon assessment within Building Regulations, including through industry proposals such as the Part Z framework.
14. Elsewhere, the NPPF places an emphasis on improving local environmental conditions and ensuring that development does not cause unacceptable levels of pollution or

environmental hazards (on a cumulative basis). Decision-making should avoid or mitigate harms such as water, air, noise and light pollution as well as loss of access to daylight. Guidance on mitigation of malicious threats has also been strengthened. Guidance on flood risks has been revised, strengthening planning requirements around coastal change and the application of National Standards for Sustainable Drainage Systems, encouraging river re-naturalisation, and enabling limited flexibility in the application of the sequential test for areas at risk of surface water flooding.

15. In terms of housing supply, the new NPPF updates the methodology for housing needs assessments, 5-year land supply and affordable housing calculation, and the housing delivery test (published separately). Plans must set expectations for a suitable mix of tenures on allocated sites and must set out the proportion of major developments to achieve M4(2) and M4(3) standards, with no less than 40% of major developments to be delivered to M4(2) standards. Planning Practice Guidance will be updated to provide greater clarity on neighbourhood plan preparation, including site allocations and the consideration of local housing need. Policies have been strengthened to ensure that substantial weight be given to the benefits of additional homes, including for particular groups such as older people (although CIAT remains concerned that calculation models will struggle to capture latent demand which has not come forward, but which would do so, were appropriate housing provided). Government has opted not to move forward with a minimum requirement for social rent provision on major developments, favouring local flexibility. Ultimately, the aim of these changes is to support diverse housing supply, to enable everyone to benefit from safe, high-quality and appropriate housing.
16. The NPPF requires local plans to allocate land capable of accommodating at least 10% of the housing requirements on sites no larger than one hectare, and a further 10% on sites between one and 2.5 hectares, unless there are strong reasons why those targets cannot be achieved. A 'new medium development' category has also been introduced for schemes of 10-49 homes on sites of up to 2.5 hectares. However, proposals to allow full discretion to developers of small and medium sites as to whether to make a payment in lieu of social and affordable housing requirements, have not been retained. Instead, payments in lieu will be accepted only where this can be justified; government will publish further guidance on this in due course. Off-site delivery may also be acceptable, where this optimises the quality or quantity of homes delivered. These changes are designed to support SME development, which CIAT believes is crucial to the success of the sector.
17. For major developments, decision-making should consider whether schemes can be brought forward at a reasonable pace, and whether conditions are needed to enable this. Clearer expectations have been set for rural development on exception sites (less than one hectare in size and meeting identified affordable housing need) or through community-led development.
18. Another key change in the new NPPF is a strong emphasis on urban densification, including through redevelopment, new development alongside existing buildings (and in gardens), upward extensions and minimum density standards. The Framework also encourages the use of design guides and codes to make best use of available land, for example to support infill. Development within reasonable walking distance (around 800 meters or 10 minutes' walk if this is less than 80 meters) of a "well-connected" station (defined as within the top 80 travel-to-work areas, and offering at least four trains per hour in either direction) should deliver at least 35 dwellings per hectare, rising to 45 dwellings per hectare where stations have high-frequency services (with higher densities encouraged where possible). Government has opted not to set minimum density standards elsewhere (such as in urban cores or areas with other good public transport connectivity) but encourages planners to set such minimum standards within local plans. CIAT strongly supports moves towards

more “gentle” urban densification, which can be achieved through low-impact low and mid-rise development, though the Institute has suggested that more ambitious minimum densities could have been applied within such a gentle density approach.

19. NPPF policies which encourage consideration of long-term economic growth have been retained, while allowing for consideration of environmental and community impacts from industrial development. The new NPPF places particular emphasis on supporting town centres as viable economic and community hubs, allowing flexibility in use while limiting loss of amenity. Developments that deliver “main town centre uses” should only be allowed outside town centres where no other suitable sites are available.
20. On infrastructure, plans will be required to give greater consideration to water and energy needs, with earlier engagement with providers. Plans should include allocations for key infrastructure, and applications should not be required to demonstrate a need for new clean energy or water infrastructure. Over time, this should help reduce bottlenecks in electricity and water connections (though this will, to some extent, be reliant on utilities companies developing sufficient infrastructure). The NPPF continues to recognise the value of telecoms infrastructure development, while seeking to minimise its visual impact.
21. The new Framework continues to prioritise coordination of development and sustainable transport, including active and public transport, both by encouraging development where such infrastructure already exists, and encouraging coordinated delivery of new infrastructure alongside wider development. A “vision-led” approach to transport planning is encouraged from the earliest stages of plan development (a welcome change, albeit one which will require greater expertise within planning bodies). The Framework also requires setting parking standards, including allowing maximum parking standards, which may be used to encourage other modal choices. Proposed developments which could generate significant movement volumes should be located to limit the need to travel and offer genuine modal choices. Place-level design should give first priority to active transport (walking, wheeling and cycling), and second to public transport. Developments which would have a severe adverse impact on the transport network should be refused.
22. The NPPF outlines a revised approach to Green Belt policy, with guidance on when new Green Belts can be established, and how existing Green Belts can be reviewed. The Framework details what development may be appropriate within a Green Belt, while prioritising Grey Belt land. Major Green Belt developments must provide high levels of affordable housing (local plans should set levels of at least 50%, with levels up to 50% where no specific local plan guidance is in place) and improved infrastructure and green space. In limited cases, a viability assessment demonstrating that compliance with the Golden Rules would not be possible may be submitted as part of a development proposal.
23. The Framework continues to support the use of design codes and design guides, while allowing for flexibility (e.g., to allow variations in design character across an authority). CIAT supports these tools as effective ways to give developers and designers greater confidence in what designs can be successfully brought forward. The NPPF also outlines key principles of well-designed places, which will be detailed in updated Design and Placemaking Planning Practice Guidance, to be published in the autumn. Government will also develop a number of Model Design Codes to support local planning authorities.
24. The new Framework builds on earlier iterations to promote healthy communities, requiring planners to set out what community recreation facilities and spaces are needed for communities. Local green spaces can be protected within plans, and key facilities and recreational land should normally be protected. The benefits of developments which improve health or reduce health inequalities should be given substantial weight in decision-making.

25. The NPPF retains an emphasis on nature recovery in both planning and decision-making. Plans should align to Local Nature Recovery Strategies and Natural England's Green Infrastructure Standards. Local standards for Biodiversity Net Gain (BNG) above the statutory biodiversity net gain requirement of 10% must be limited to individual sites. Developments should contribute positively to the natural environment, including through conserving and enhancing landscape and habitat, protecting higher quality agricultural land, connecting and strengthening ecological networks, and utilising green infrastructure to deliver multiple benefits at once. The NPPF introduces specific requirements for incorporation of swift bricks (unless there are compelling reasons against this) and for making new streets tree-lined (including requirements for maintenance). Development on Protected Landscapes should be limited in scale and extent and sensitively located and designed; major developments on Protected Landscapes should normally be refused.
26. The Framework updates policies for heritage assets, with the aim of both reducing legal uncertainty and encouraging the conservation and use of heritage buildings. Developments affecting heritage assets should be accompanied by an assessment of the impacts of development (positive and negative), and harms weighed against benefits, with decision-making guidance reflecting the balance of this assessment. Dedicated guidance is now provided for World Heritage Sites and conservation areas. Government has confirmed that it intends to commence Section 102 of the Levelling-up and Regeneration Act 2023, which creates 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, and duties to maintain a publicly available historic environment record (currently required within the NPPF).

Statutory Consultees reform

27. Alongside publishing the new NPPF, Government has published its response to a consultation on statutory consultees, with the aim of accelerating planning decisions. A moratorium on new statutory consultees is being maintained. While Government has confirmed these reforms, a number of the changes require secondary legislation before they take effect. Members and affiliates should therefore continue to check the statutory consultation requirements applying at the time an application is made.
28. Sport England will be retained as a statutory consultee, but the range of planning applications on which it must be consulted will be narrowed, to focus on applications that involve the loss of playing fields for housing or commercial development, and substantial school or sports development on playing fields. Sport England will no longer be notified on lower-risk categories, defence and prison sites, sites with playing pitches smaller than 0.4 hectares, development next to playing fields, ancillary facilities such as pavilions and parking, and temporary classrooms and other routine school development. It is expected that this will reduce referrals by more than half. Government has also prescribed Sport England in 'Requirement to Assist' regulations so they will be obliged to assist with plan making, where a plan-making authority reasonably requests this.
29. The Gardens Trust and Theatres Trust will no longer be statutory consultees, but a new notification requirement is being introduced, enabling these bodies to contribute to consultations where relevant.
30. The referral criteria for National Highways will be changed from consultation on all development other than minor development to consultation on developments where a transport assessment is required. Other consultation requirements will be maintained, such as where proposals involve development next to a trunk road, increase the use of an existing access or junction with a trunk road beyond its capacity or have a safety impact.

31. Referral criteria for Active Travel England will be narrowed, removing the requirement to consult on commercial development and raising the threshold for residential consultation from 150 to 250 units. Consultation will also be required for highway authority development requiring planning permission, and on school and college development involving a net increase in floorspace of more than 750m².
32. Historic England's criteria will be amended, removing the requirement for notification for Grade II listed building consent applications, except where total demolition is proposed, and raising the conservation area notification threshold from 1,000m² to 2,000m².
33. There will also be changes to the Mining Remediation Authority's requirements, with stronger standing advice for lower-risk development.
34. Natural England remains a statutory consultee, with a new approach to giving advice to be outlined in an Operational Statement in due course. DEFRA is working with Natural England, the Environment Agency and the Forestry Commission to increase capacity and ensure alignment.

Planning Fees reform

35. In July, Government published the outcomes of a consultation on reform of planning fees. Government intends to introduce a new national default fee schedule which will seek to achieve 90% cost recovery (with the remainder to be funded from general taxation) across a simplified fee structure. Local planning authorities will be able to set fees at 30% above the national default fee, where justified by evidence.
36. Fees will be banded by application size, with separate fees outline, full and reserved matters applications for residential and non-residential development, with flat fees implemented for Permission in Principle applications for small and medium developments.
37. Government will bring forward legislation to implement these changes (including setting specific fee levels), with the aim of implementing the new structure later in 2026.

Planning Committee Reform

38. Earlier this year, Government consulted on draft legislation to implement previously proposed changes to planning committees. This will establish a two-tier national scheme of delegation, with more applications handled by planning officials. Domestic applications, permission in principle applications, and minor commercial and residential applications must always be delegated to officials. Other applications (such as listed building applications and non-minor applications) may be handled by either officials or elected committee members. The reforms will also cap the size of planning committees.
39. The aim of reforms is to accelerate (and depoliticise) smaller applications, while allowing planning committees to focus on strategic and contentious proposals which require greater democratic oversight. Government intends the regulations to come into force by 31 October 2026.

Housing Delivery Test

40. Results of the most recent Housing Delivery Test (covering 2023-25) have now been published, alongside a revised test methodology. While the presumption in favour of sustainable development will now apply regardless of test outcomes, the results still have an important planning impacts. Where delivery falls below 95% of the requirement an authority should prepare an action plan; below 85%, a 20% buffer should also be added

to the five-year-land-supply; and below 75%, an evidenced unmet need for housing is deemed to exist for the purposes of the relevant NPPF decision making policies.

Implications for Architectural Technology professionals

41. While it will take time for the changes from the new NPPF to be fully reflected in local plans, new decision-making policies apply immediately. That means changes should begin to be felt right away. Professionals are therefore strongly encouraged to familiarise themselves with the new NPPF, and should not rely on guidance, references, or wording based on previous versions of the Framework.
42. Members and affiliates developing projects in England that have not yet secured planning permission should familiarise themselves with new decision-making policies, alongside specific local development plan requirements and any additional policies or guidance (such as local design codes). Understanding and addressing these policies from the outset should help members prepare more robust applications and identify planning issues earlier. Members and affiliates should also remember that planning permission and Building Regulations approval are separate processes: satisfying planning policy does not demonstrate compliance with the Building Regulations or vice versa.
43. All else being equal, the NPPF decision-making policies provide stronger support for proposals involving appropriate urban densification (particularly around key transport hubs), as well as projects which support the sensitive reuse of heritage assets, and developments which contribute to the wider environment, economy and community.
44. At the same time, members and affiliates should expect to see fewer decisions taken by planning committees, with more decisions made by officials, and should familiarise themselves with changes to processes and fees, where applicable.

Further information

- **National Planning Policy Framework (August 2026)**
https://assets.publishing.service.gov.uk/media/6a82fb953bd75b81e2329a87/National_Planning_Policy_Framework.pdf
- **Consultation outcome – NPPF Reforms**
https://assets.publishing.service.gov.uk/media/6a82fcec3bd75b81e2329a89/National_Planning_Policy_Framework_consultation_-_government_response.pdf
- **Consultation outcome – Changes to Statutory consultees**
<https://www.gov.uk/government/consultations/reforms-to-the-statutory-consultee-system/outcome/reforms-to-the-statutory-consultee-system-government-response>
- **Planning committee reforms – Statutory Guidance**
<https://www.gov.uk/government/publications/planning-committees-and-the-national-scheme-of-delegation-of-planning-functions-guidance-for-local-planning-authorities-in-england/planning-committees-and-the-national-scheme-of-delegation-of-planning-functions-guidance-for-local-planning-authorities-in-england>
- **Housing Delivery Test – measurement rulebook**
<https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book>
- **Housing Delivery Test – 2025 results**
<https://www.gov.uk/government/publications/housing-delivery-test-2025-measurement>

Questions regarding these issues should be directed to externalaffairs@ciat.global.

CIAT, August 2026