

## **The National Planning Policy Framework Consultation Briefing Note, February 2026**

### **Introduction**

The consultation for the proposed revision of the National Planning Policy Framework is currently live (until 10<sup>th</sup> March 2026). This note discusses some of the key issues the consultation paper and draft NPPF raise. It is not intended to be a comprehensive response to the document, but an overview of key issues.

### **Housing Delivery**

A key aim of the draft NPPF is to address the housing crisis, with the intention of building faster. This is clearly an important aim, with many people having difficulty in gaining access to housing of various tenures.

However, the actual policy is to increase the supply of housing land. In some areas, increase in the supply of land is an essential solution. But the barrier to house building in many areas is viability. Where there are already viability challenges, increasing the land supply can widen the viability gap. In more marginal areas, increasing the land supply can create viability gaps or increase the risk of developing land, by reducing profitability.

This means that the policy could reduce the rate of house building in some parts of the country. Past evidence suggests that housing targets do not increase delivery. In less prosperous urban areas, increase in housing targets and release of grey belt land is already undermining regeneration of brownfield sites and reuse of vacant buildings. Thus, the policy to increase land supply can undermine delivery in the areas that most need investment. This could lock some areas into a cycle of decline for a generation or more.

Even in more prosperous areas, increasing the land supply can have an unpredictable effect on delivery. There are parts of the country where large numbers of houses have been approved, but only a proportion are being delivered. This is due to the business model used by house builders, which relies on housing being delivered at a certain rate. Too much development happening simultaneously is financially risky. Developers are understandably cautious.

In terms of affordable housing, planning policy has worked to some extent in areas with average economic characteristics, but has failed to deliver housing that most people can afford in high growth areas. In areas of deprivation, housing is not viable even without an affordable provision. These issues have not been addressed in past versions of the NPPF and have still not been addressed.

## **National Policies**

The new policy-based format is clearer. These are not statutory development management policies, as was originally suggested, but they do appear to have increased weight. So, they do represent centralisation of policy making, which takes less account of locally-specific factors. In the past, centralisation has rarely led to better outcomes.

Of most concern is the London-centric nature of the policies. They assume higher growth land and property economies, whilst there is little to address the needs of areas suffering from deprivation (urban and rural).

The aim of densification is an example of this. For areas with declining high streets, vacant properties, derelict land and lack of economic opportunity, densification could appear somewhat at odds with the actual problems that need to be addressed. A one-size-fits-all approach is clearly not appropriate.

There is little in the NPPF to address the needs of under-performing areas, including key challenges around viability and lack of local economic opportunity. Housing can be relatively cheap in such areas, but the barrier to accessing housing is low income. There should be a far greater emphasis in the document on planning for regeneration in areas of deprivation and the role of the planning system in creating investor confidence and attracting investment, including in employment. Uncertainty and weak planning can be a barrier to investment in such areas.

Road layout and capacity do not always support densification, and increased congestion can cause social, economic and environmental problems, which can harm local businesses.

## **Settlements and the Presumption**

The new presumption and the different approaches to development in settlements and outside of settlements raises issues for both urban and rural areas. Many people would agree that many types of development are better located within settlements, and local policies support this. But the new presumption makes blanket assumptions. There are numerous locally specific factors, including compatibility with existing land uses, historic areas, local economic conditions and need for regeneration. For urban areas, the presumption could lead to acceptance of unsustainable development, whilst rural areas and economies have very different needs in terms of diversification.

The settlement policies are open to interpretation and could have unpredictable consequences, including undermining regeneration and economic development in both urban and rural areas. This is a good example of where generic and centralised policies are likely to lead to poorer social, economic and environmental outcomes.

The approach to development around railway stations is similarly positive in principle, but locally-specific factors are key or there could be unpredictable consequences.

## Neighbourhood Planning

Changes to the policy on neighbourhood plans are especially of concern, and potentially ignore areas of deprivation, rural areas, struggling high streets and places in need of regeneration. It appears to decrease the weight of neighbourhood plans that don't make site allocations. However, many rural plans support growth through amended settlement boundaries and regeneration or diversification policies.

In many urban areas, neighbourhood plans can support growth through regeneration of underused commercial and industrial areas, refurbishment of vacant buildings (sometimes involving large amounts of floor space), development of derelict land, use of upper floors and other means. In such areas, releasing less sustainable sites could actually undermine regeneration and economic development.

The best neighbourhood plans include innovative solutions for supporting growth and tackling local challenges. The NPPF should support this, widening the focus from site allocations alone, to policies for physical and economic regeneration, settlements, diversification and economic development. This includes addressing the needs of rural and urban areas, including under-performing areas.

## Heritage

The heritage chapter is being rewritten in response to ambiguity and legal challenges. There is a welcome shift in emphasis on positive solutions for reusing buildings. This helps to challenge false dichotomies between growth and heritage (heritage is often a positive tool for regeneration).

However, the main reason for confusion and legal challenge remains. The terminology used in the NPPF still relates to the wording in a heritage act which was abandoned due to the banking crisis. It refers to significance including setting, whereas the legislation refers to special architectural or historic interest and setting.

Significance is being interpreted very differently, including by those using the outdated English Heritage Conservation Principles document, which is only partly compatible with the legislation. The wording in the NPPF should closely reflect the legislation, or the confusion and legal challenges are likely to continue. In addition, it would be helpful for Historic

England guidance to be reviewed, with a focus on positive planning for heritage and legal compliance.

### **Other Matters**

One of the consultation questions relates to changing the sequential approach to town centres. Past policy has resulted in harm to some town centres, but also now failing out-of-town schemes. It is important to avoid generalisations, as many city and town centres are doing relatively well. But for all town centres and high streets, there should be a focus on enhancing their viability and vitality and not supporting development in less sustainable locations.

The climate change section is focused on mitigation, but could place more emphasis on planning for sustainable neighbourhoods, for example by maintaining and creating mixed-use, walkable neighbourhoods.

### **Conclusions**

It is difficult to avoid conclusions that the NPPF is written from a London and southeast perspective. It doesn't really address the needs many parts of the country, such as coastal and industrial towns and areas of deprivation. This does not mean that it is necessarily beneficial for London, especially given that some solutions to the London housing crisis depend on incentivising employment development in other parts of the UK, and creating stronger transport linkages between different parts of the country.

The emphasis on high-growth areas could actually undermine growth in areas where viability and lack of local economic opportunity are key challenges. Regeneration in such areas should be addressed directly.

## About Urban Vision Enterprise

This briefing note has been prepared by Urban Vision Enterprise, and D2H Land Planning Development. The former deals with a range of public and voluntary sector clients, including statutory planning bodies. The latter has clients including developers, housebuilders and landowners. This provides a perspective based on experience of the planning system from both sides of the fence.

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