

NATIONAL PLANNING POLICY FRAMEWORK

Summary: An update on the National Planning Policy Framework consultation, including the Board's draft consultation response.

Recommendation: To note progress with drafting the Board's response to the consultation on the National Planning Policy Framework consultation.

Report by: John Mills, Planning Lead

INTRODUCTION

1. On December 16 2025, the Government published its consultation on proposed reforms to the National Planning Policy Framework (NPPF). The consultation ends on 10 March 2026.
2. The consultation web page can be found here:
<https://www.gov.uk/government/consultations/national-planning-policy-framework-proposed-reforms-and-other-changes-to-the-planning-system>
3. The consultation documents include:
 - [the Government's commentary on the proposed reforms](#);
 - [the text of the draft NPPF](#); and
 - questions on proposed reforms to the NPPF.
4. The consultation poses 225 questions. However, as outlined below, I have focussed on only a handful of those questions, which I consider to be particularly relevant and / or significant, in the context of potential implications for the Cotswolds National Landscape.
5. The NPPF is the primary document setting out the UK Government's planning policies for England. It was first published in 2012, since when it has gone through eight iterations, the most recent being the version published in December 2024.
6. The Government considers the consultation draft of the NPPF to be the most significant re-write of planning rules in over a decade. The Government's aspirations for this revamp include accelerating the delivery of 1.5 million homes this Parliament and unlock new jobs, infrastructure and clean energy.

WHY SHOULD THE BOARD ENGAGE WITH THE NPPF CONSULTATION?

7. The NPPF is one of the most important reference points for the planning system in England, including in plan-making (e.g. local plans) and in development management decision-making (e.g. for decisions relating to planning applications and planning appeals). As such, the extent to which the planning system helps, or fails, to conserve and enhance the natural beauty of the Cotswolds National Landscape (CNL) is very dependent on the policies that are set out in the NPPF.

ENGAGEMENT TO-DATE

8. In early January 2026, I compiled a document that set out my initial thoughts on those aspects of the NPPF that relate directly to National Landscapes. That document formed the basis of an update on the NPPF consultation to a meeting of the Board's Planning &

Infrastructure Working Group (PIWG), on 12 January, and to a meeting of the Board's Executive Committee, on 20 January.

9. There was a lengthy discussion on this topic at the Executive Committee meeting, the outcome of which is discussed in more detail later in this paper.
10. I shared my 'initial thoughts' document with colleagues on the National Landscape Association's (NLA) Planning Working Group (PIWG) at a meeting on 14 January. I have also liaised with Claire Tester, South Downs National Park Authority, who is coordinating the response to the NPPF consultation on behalf of the National Park Authorities.
11. In addition, I have liaised with planning colleagues at Cotswold District Council suggesting that we work together to align our consultation responses where relevant / appropriate.
12. The NPPF consultation was also discussed at a meeting of the Southern Protected Landscapes Planning Officers' Group (SPLPOG), which I chair, on 21 January. At that meeting, Alastair Locke, Defra, recommended identifying the top 3-5 issues which could provide the basis for further discussion with the Ministry of Housing, Communities and Local Government (MHCLG).
13. Since those meetings, I have worked up a more comprehensive draft response (see Appendix A), albeit that this is still focussed on those aspects of the NPPF that relate directly to National Landscapes and other aspects that are likely to have a significant impact on National Landscapes.

PRE-EMINENT ISSUE – THE GOVERNMENT'S STANDARD METHOD FOR CALCULATING HOUSING NEED

14. The draft NPPF includes a new annex on the Government's standard method for calculating housing need, the content of which has been imported from Planning Practice Guidance.
15. The consultation doesn't specifically ask for the opinion of consultees on the standard method. However, as discussed at the Board's Executive Committee meeting on 20 January, I consider that the standard method is the issue that has by far the greatest implications for development in the CNL in its setting.
16. It was agreed at the Executive Committee that the standard method should be a focal point for our NPPF consultation. It was also agreed that the Board should write a letter, on this issue, to the Secretary of State, MHCLG, and to the Members of Parliament (MPs) whose constituencies overlap with the CNL – see Appendix B.
17. The standard method is such an important issue because the changes that were made to the standard method in December 2024 have resulted in the housing need figure for the local authorities that overlap with the CNL increasing by an average of 67%. For three of these local authorities, this figure has more than doubled. The increase in housing need has directly led to a significant reduction in the housing land supply of these local authorities.
18. The main implications of these changes are that:
 - (i) the local authorities will now be expected to accommodate an unprecedented quantum of housing development in their local plans; and

(ii) it is now much easier for developers to secure permission for harmful development in the CNL and its setting.

19. The draft response recommends that the standard method should be reviewed.

POSITIVE CHANGES TO THE NPPF

20. One of the positive changes introduced by the draft NPPF is that it now refers to conserving and enhancing the natural beauty of Protected Landscapes, whereas the December 2024 iteration (and previous iterations) referred to 'conserving and enhancing landscape and scenic beauty'. The new wording better reflects the purpose of National Landscape designation.
21. At the NLA Planning Working Group on 14 January, there was some discussion about whether the NPPF should include a definition of natural beauty. I offered to draft a definition, which I have done – see Appendix A. However, there are strong differences of opinion on this issue across the Protected Landscapes family (some in favour of having a definition and some against), so this is not likely to be taken forward.
22. Another positive change is that the draft NPPF, for the first time, explicitly refers to Protected Landscape Management Plans, in relation to plan-making. The draft response recommend that Management Plans should also be explicitly addressed in relation to decision-making.

CHANGES THAT ARE OF CONCERN

23. One of our main concerns with the draft NPPF is that it proposes an automatic presumption in favour of granting planning permission (i.e. the tilted balance) for many types of development within and outside settlement boundaries. The draft response recommends that the automatic presumption should not apply in National Landscapes.
24. At the same time, the draft NPPF no longer sets out the circumstances in which the application of policies relating to National Landscapes would dis-apply the tilted balance. The draft response recommends that the relevant wording from the December 2024 iteration of the NPPF should be re-instated, at least for National Landscapes.
25. The draft NPPF removes the statement that National Landscapes (and National Parks) have the highest status of protection (in relation to conserving and enhancing landscape and scenic beauty). The draft response recommends that this statement should be reinstated.
26. We are concerned that the draft NPPF weakens the wording relating to major development in National Landscapes. The December 2024 iteration states that 'permission should be refused for major development ...' whereas the draft NPPF 'proposals for major development should only be supported...'. The former provides a clear presumption against major development whereas the latter is more permissive. We want the December 2024 wording to be reinstated.

CHANGES FOR WHICH THERE ARE DIFFERENCES OF OPINION IN THE NATIONAL LANDSCAPES FAMILY

27. One of the proposed changes in the draft NPPF is that, for the first time, it makes explicit reference to the issue of compensation in relation to major development in National

Landscapes. I think that this is a positive step, provided that compensation is addressed as a last resort. However, some National Landscapes do not want the NPPF to make any reference to the issue of compensation in this regard for fear that it will create a 'trash for cash' approach to development.

28. For the purposes of the Board's consultation response, I think that we should support this change (including applying it to proposals that don't constitute major development).

LETTERS TO THE SECRETARY OF STATE AND TO OUR MEMBERS OF PARLIAMENT

29. When the NPPF consultation was discussed at the Executive Committee meeting on 20 January, it was agreed that, alongside our formal response to the NPPF consultation, we should also write to the Secretary of State at the Ministry of Housing, Communities and Local Government (MHCLG) and to the Members of Parliament (MPs) expressing the Board's concerns about the Government's standard method for calculating housing need – see Appendix B.

NEXT STEPS

30. I haven't yet looked, in any detail, at the implications of other proposed changes that relate to factors that contribute to natural beauty and / or to our Management Plan aspirations (for example, biodiversity, historic environment, climate change, 'grey belt', etc.). I will endeavour to do so in the next couple of weeks. However, I anticipate that our key recommendations will remain broadly the same.
31. There is a further meeting of the NLA's Planning Working Group on 18 February, which may lead to some further amendments. I will also liaise with Cotswold District Council on our draft responses.
32. Following the Board meeting on 24 February, I will circulate an updated draft response to the Planning & Infrastructure Working Group for further comments. I will then finalise the Board's response and submit it by the deadline of 10 March.
33. I have organised a meeting for the Board's local authority appointees and parish council appointees, on 16 March, to discuss this issue of housing. This meeting is being organised in response to a request that was made at the last Board meeting in October 2025.
34. This meeting is taking place after the NPPF consultation deadline. However, the discussion at this meeting could potentially influence the final content of the proposed letters to the Secretary of State and to our MPs. It is anticipated that these letters will be sent out by the end of March.

DECISIONS REQUIRED

- No decisions required but the Board is asked to note the response.

SUPPORTING PAPERS

- Appendix A: Draft NPPF consultation response
- Appendix B: Draft letter to Secretary of State and MPs