

Planning Policy Consultation Team
Planning Directorate – Planning Policy Division
Ministry of Housing, Communities and Local Government
Floor 3, Fry Building
2 Marsham Street
London SW1P 4DF

20 February 2026

Dear Sir/Madam

Re: Proposed reforms to the National Planning Policy Framework and other changes to the planning system

I am writing on behalf of CPRE Sussex, the Sussex branch of the Campaign to Protect Rural England, registered charity 1156568. Our consultation response complements and supplements the submission from our national sister organisation, CPRE, registered charity 1089685.

There are a number of changes in the proposed draft National Planning Policy Framework (NPPF) that we broadly support. These include:

- The ongoing commitment to a plan-led approach to land use and development.
- The facilitation of the return of regional-scale strategic planning, with the advent of long-term Spatial Development Strategies (SDSs) - although this must be supported with the much-delayed Land use Framework.
- The encouragement of development within existing settlement boundaries.
- The focus on (gentle) densification within existing settlements.
- The format change by substituting paragraphs with policy numbers, to synchronise with Local Planning Authority (LPA) plan usage.

If given due weight by plan and decision-makers (and if not undermined by other policies elsewhere in the NPPF), these approaches could help to maintain a strategic and planned approach to development, preserving countryside from speculative attacks.

However, there are a number of areas where the changes proposed in the draft NPPF are deeply alarming. Without significant amendment, they will lead to the loss of

cherished landscapes, nature and environmental services and local democratic decision-making, sacrificing our much-loved countryside to speculative development that will do little to tackle the housing crisis.

The undermining of ‘sustainable’ development

The proposed NPPF further undermines the already much-abused concept of sustainable development which is being sacrificed on an altar of appeasement to the development industry. Rather than recognising that sustainability requires us first and foremost to work within ecological limits (as a necessary condition of our long-term survival), and then to meet social needs, the new draft places an unwarranted emphasis on economic growth at all costs. This is particularly the case in the context of the new SDSs (PM1), where soundness would now be judged not simply on the Strategy’s ability to meet local needs, but on its approach to delivering growth (PM14). It is notable that the current NPPF’s insistence that “Planning policies and decisions must also reflect relevant international obligations and statutory requirements” has been deleted.

According substantial weight to the economic benefits of energy and water-hungry AI data centres and road-based logistics (E2), with little consideration of their environmental impacts, exemplifies a topsy-turvy mindset, which ignores these realities. It is disappointing to note that Policy E3 appears to be predicated on freight being carried by road and not by rail. It should be much more positive to encourage an expansion of the rail network for freight distribution.

Our economy can only grow long term by working in collaboration with our natural environment - the natural assets and resources (some non-renewable) that we all depend on. Ecology is not the enemy of growth; it is its essential partner in securing a sustainable future for all. As the government’s response to the Treasury-commissioned Dasgupta report on the Economics of Biodiversity concluded, “nature, and the biodiversity that underpins it, ultimately sustains our economies, livelihoods and well-being, and so our decisions must take into account the true value of the goods and services we derive from it”.¹ Natural England’s chair, Tony Juniper, has similarly written that: “Growth that results in the destruction of nature will, in the end, cease. Economic

¹ HM Treasury (2021) The Economics of Biodiversity: The Dasgupta Review - Government response https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1002824/Dasgupta_Response_web_July.pdf

development that by contrast drives toward net zero greenhouse gas emissions and the recovery of nature is a very different prospect.”²

In a context where the government’s own *National security assessment on global ecosystems*³ notes that critical ecosystems are on a pathway to collapse, with severe implications for food security, this failure to prioritise ecological boundaries as the foundation of the planning system is a severe dereliction of duty, potentially leading to significant harm.

Centralisation and the loss of community voice and leadership

The overall direction of travel in the draft, allied to changes announced elsewhere, is to further centralise power within the planning system, and to tip the balance in favour of major developers and landowners, reducing local democratic influence and community control.

In doubling down on the flawed Standard Method formula for centrally-mandated housing targets (HO1, Annex D) introduced in the last iteration of the NPPF, with its arbitrary multipliers and ‘affordability factor’, the proposed policies continue to force Local Planning Authorities (LPAs) to meet requirements that bear little relationship to real need. The formula’s baseline is derived from projected household growth, which is itself influenced by the existing housing stock and past rates of household formation. The more homes an area builds, the higher its projected household growth — and therefore the higher its future target. The target does not diminish as need is met; it ratchets upward with each review cycle. Conversely, areas with suppressed household formation — often because housing is cramped, poor quality, or insufficient — generate lower projections and therefore lower targets. The Government itself acknowledged this flaw when it declined to adopt the 2016-based ONS household projections, which would have reduced national housing need by 22%, precisely because those projections reflected past under-delivery rather than genuine future need. Yet the underlying logic remains unchanged.

The affordability adjustment compounds the distortion. It inflates targets in areas where house prices are high relative to earnings, on the assumption that high prices signal undersupply. In areas like rural Sussex, this assumption is false. High prices here reflect landscape quality, proximity to the South Downs, coastal amenity, and heritage

² Tony Juniper (2022) *Nature is not an impediment to UK economic growth: it’s vital to it* Guardian <https://www.theguardian.com/commentisfree/2022/sep/28/nature-vital-uk-growth-economic-system-natural-world-growth>

³ HM Government (2026) *Nature security assessment on global biodiversity loss, ecosystem collapse and national security*. <https://www.gov.uk/government/publications/nature-security-assessment-on-global-biodiversity-loss-ecosystem-collapse-and-national-security>

character — not a shortage of housing stock. The formula cannot distinguish between a market that is expensive because homes are scarce and one that is expensive because the place is beautiful. The ONS 2024 affordability data illustrate the result: Burnley, with a median house price to workplace earnings ratio of 3.9, receives a minimal target despite well-documented housing deprivation, while districts like Horsham — whose high ratio reflects desirability, not shortage — are assigned a target of 911 homes per annum. The greatest development pressure thus falls on the most environmentally sensitive areas, while places with the poorest housing conditions receive the least impetus to improve.

Critically, the affordability improvement the formula promises cannot be delivered by the development it demands. Building 500 homes on the edge of a Sussex village will not meaningfully shift the Brighton or Worthing housing market; the amenity premium that drives prices will persist regardless. What will not persist is the countryside. The standard method therefore commits attractive rural areas to a cycle of permanent landscape loss in pursuit of a target that recedes with every review — a mechanism that rewards inaction, penalises delivery, and mistakes desirability for shortage. Even were the targets deliverable in practice – which they are demonstrably not in many cases – they will do little to address the housing crisis, where social housing (and other, non-planning, policies) should be the real priority.

The text needs to be clearer on how the setting of local plan housing figures (HO2) and identifying significant site allocations (HO4) should balance the arbitrary figures produced by the Standard Method (HO1) with the need for environmental protection set out in Policy N1. If we are serious about sustainable development, ecological limits and nature recovery, then the safeguards and opportunities identified under N1 should have very substantial weight in setting realistic local housing targets. Taking a Sussex-specific example, the policy contains a welcome reference to chalk streams; the protection of these unique habitats should not be undermined by the imposition of excessive housing numbers.

Neighbourhood plans have played such a constructive role in involving the local community, have already been fundamentally undermined by the removal of funding to support their preparation, and are further marginalised by such targets and the fact that PM17 effectively neutralises the scope of initiative and freedom for invention on the part of Neighbourhood planners.

The creation of (non-statutory) National Development Management Policies and the restriction of LPAs' ability to set their own standards in most areas (PM6, PM13) is also highly centralising, removing the ability of LPAs to drive innovation and higher standards through locally-distinctive policies (such as on the environmental performance of new

buildings). The failure of the government to publish its final Future Homes Standard at the time of writing does not fill us with confidence that this approach in the NPPF will drive up standards across the board. Similarly, limiting LPAs' ability to go beyond the 10% BNG requirement where appropriate will damage plans for nature recovery, cutting across the ambitions of the emerging Local Nature Recovery Strategies, as well as broader national strategies and targets.

The proposed changes on decision-making will lead to more poorly-informed decisions, with decision-makers encouraged to press ahead even in the absence of information from (stretched and under-resourced) expert consultees (DM3.1.d). This policy exemplifies the bias towards approval, no matter what the circumstances, in that delays in the decision-making process are only permissible if the delay enhances the possibility of a decision in favour of development. There will be circumstances when more detailed advice would be required to understand potential harm to wildlife or habitat, in accordance with N2, and which would and should lead to a refusal.

Combined with reforms to the role and powers of planning committees to be introduced under the Planning and Infrastructure Act, and with the previously-announced intention for the government to effectively call-in all refusal decisions for developments of 150+ homes, this NPPF further reduces the power of local people and their representatives to shape the places where they live.

All of this takes place in the context of Local Government Reform, which in Sussex, will see planning and other decisions being taken further away from the communities they affect.

The balance remains tilted in favour of unplanned, speculative greenfield development

The draft fundamentally leaves unchanged a system over-reliant on the goodwill of the private sector (a small number of bigger developers in particular, and landowners and their agents) to deliver housing completions, and which then penalises LPAs when developers do not build out their permissions, over which failure, LPAs have no control. Failures on the Housing Delivery Test (HDT) and 5 Year Housing Land Supply (5YHLS), would mean that speculative, unplanned, unallocated, countryside development "should be approved" by decision-makers (S5.1.j).

This drives a coach and horses through the intent to encourage development towards existing settlements, or to pursue plan-led development. The yawning gap between the unrealistic and undeliverable 'Standard Method' targets and the reality of delivery on the ground is stark in Sussex: according to recent data, the historic county was building fewer than half of the total number of houses that the government was demanding of

them despite the high levels of approval of planning applications received by nearly all LPAs.⁴

The proposed policy on building out existing permissions (HO13) is far too weak to give LPAs the power to force developers to build the consents they have already secured – and developers have every incentive to only build at a rate that does not impact local prices (and which in turn opens up more lucrative, speculative opportunities through a low-scoring HDT). This creates a structural trap: the same developers who control build-out rates then benefit from the speculative opportunities that open up when authorities fail the HDT as a consequence of slow delivery. The proposal contains no effective power for LPAs to force developers to build out, yet it is LPAs who are held to account if developers fail to build out their permissions.

The cumulative approval of developments (under S5) outside, but close, or adjacent to, existing settlements under these policies, will lead to creep in the de facto settlement boundary, and hence the further expansion of countryside development under the rubric of policy S4. In rural districts with poor supply/delivery, the new spatial test must not become a backdoor presumption for edge-of-settlement housing that erodes countryside character or heritage settings. There should be explicit safeguards for settlement identity, coalescence, landscape character, Protected Landscape and heritage setting in S5 implementation.

While we welcome the requirement that new development be “well-related to an existing settlement” this must be tightly defined, as creating a walkable relationship to services; not just visibility or highway proximity. As we set out below, speculative land promotions in Sussex already demonstrate how road connectivity alone is used to justify strategic extensions to rural villages — the definition must be robust enough to resist this.

Strategic planning, governance reform and the risk to non-designated countryside

The draft Framework does not adequately address how multiple concurrent reforms to planning and governance will interact to affect currently undeveloped countryside. Individually, the strengthening of national decision policies, the emphasis on housing delivery, and the move toward larger strategic authorities aligned with economic geography are understandable objectives. In combination, however, they risk redirecting significant development pressure toward rural areas that lack national landscape

⁴ CPRE Sussex (2025) *More housing for Sussex: Government ambition & local deliverability collide*
<https://www.cpresussex.org.uk/news/more-housing-for-sussex-government-ambition-local-deliverability-collide/>

designation but are valued for their scenic quality, ecological function, flood management role, heritage setting, and contribution to rural character.

This is not necessarily a theoretical concern. In Sussex, proposals for local government reorganisation promoted by the Centre for Cities⁵ identify a functional economic area centred on Brighton and Crawley and recommend authority structures designed to address urban “underbounding” and accommodate growth at scale. The countryside between these centres is directly in the path of increasing strategic development pressure.

The market is already responding – and has been for some time. Taylor Wimpey, one of the UK’s largest volume housebuilders, has been actively promoting land north-east of the village of Henfield for strategic development since at least 2020, when it submitted formal representations to the Horsham District Regulation 18 Local Plan consultation. Those representations explicitly argued that the southern part of Horsham District is “widely unconstrained from landscape designations of national importance” and that Henfield should accommodate strategic growth to help meet the unmet housing needs of coastal authorities including Brighton, Worthing and Adur. Taylor Wimpey’s promotional website⁶ now proposes approximately 500 homes, with a planning application targeted for Spring 2026 – all in advance of any plan-led assessment of the site’s suitability.

This pattern illustrates a problem the Framework must seek to prevent. A major housebuilder has identified countryside between two urban centres, noted the absence of national landscape designation, constructed a strategic narrative linking the site to unmet need from constrained neighbouring authorities, and is moving toward a planning application — without the countryside itself being afforded any meaningful policy protection. The argument deployed is precisely the kind of strategic convenience the Framework should guard against: land positioned as suitable primarily because it is not nationally designated and lies on a road between larger settlements, rather than because it represents genuinely sustainable growth.

The Framework should also give greater weight to the fundamental asymmetry between the pressures driving countryside development and its consequences. Housing delivery shortfalls, governance structures, and economic geographies are dynamic and adjustable over time. The loss of undeveloped countryside, whether Protected Landscape or not – particularly land contributing to landscape character, ecological networks, flood storage, and the setting of historic settlements – is permanent and irreversible.

⁵ Centre for Cities (2025) *Priority Growth: How to reorganise local government in 2026*
<https://www.centreforcities.org/publication/priority-growth-how-to-reorganise-local-government-in-2026/>

⁶ www.londonroadhenfield.co.uk, launched January 2026

We recommend that the final Framework explicitly address the relationship between strategic planning geographies and countryside protection, confirming that:

- the intrinsic character, landscape setting, and environmental function of non-designated countryside remain material considerations even within growth corridors or functional economic areas;
- development justified by economic geography or unmet housing need must demonstrate genuine spatial sustainability — not merely road connectivity or proximity to a larger centre, and the characterisation of countryside as “unconstrained” simply because it lacks national designation should not be treated as evidence of suitability;
- strategic planning must follow a clear sequence: urban capacity, brownfield land, and infrastructure-led locations should be prioritised and demonstrably exhausted before growth is directed toward rural settlements; and
- decision-makers should give substantial weight to the long-term environmental, landscape, and settlement-structure consequences of development, recognising that short-term supply pressures do not justify irreversible spatial change.

The existence of a train station should not trump everything else

CPRE Sussex welcomes, in principle, the idea that, all things being equal, the immediate vicinity of a well-served train station is a better location for development than somewhere entirely car-dependent. (And overall, we support the use of data-driven tools to identify settlements that are better connected by public and active transport as places that are more appropriate for development.)

However, we are deeply concerned that a ‘default yes’ approach to station-adjacent development (S5.1.h) will be seen as a consideration that trumps all others, up to and including statutory landscape, nature or heritage designations, regardless of specific local circumstances.

The policy as drafted is a charter for the significant loss of valued landscapes, wildlife habitat, food production, flood protection and other critical land uses around stations, with too much scope given to speculative developers to make the case that poorly designed, low-infrastructure schemes near stations should get a free pass, even if they harm National Landscapes or National Parks. A rethink is needed to ensure decision-makers can more readily give substantial weight to the adverse impacts of such schemes, *including* in contexts where the LPA cannot demonstrate a 5YHLS or scores below 75% on an HDT.

Valued and Protected Landscapes

The erasure of language (in the current NPPF's para 187) around "protecting and enhancing *valued landscapes*" is highly worrying. It suggests that countryside that is valued for its landscape quality but lacking formal designation will be accorded less protection than at present. The current language should be restored within policies N1 and N2, reflecting the importance of 'ordinary countryside' for the public: 91% think the countryside is something that makes Britain special.⁷ As the Henfield example above demonstrates, it is precisely this kind of non-designated countryside — valued for landscape, ecology, flood management and heritage setting — that is most vulnerable to the convergence of strategic planning narratives and speculative land promotion.

The proposed changes to the NPPF significantly weaken protections even for notionally 'Protected' Landscapes – which will be further harmed if the government follows the Fingleton Review recommendations.

Current NPPF (para 189) language that "*Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues*" has been watered down in N4 para 1 to "*Substantial weight should be placed on the importance of conserving and enhancing the natural beauty of these areas*". The downside of the omission of the reference to according protected landscapes the highest status of protection is apparent from the points below.

It is noteworthy that the highlighted new words have been added for the first time "*Development proposals within Protected Landscapes should be limited in scale and extent **and sensitively located and designed to avoid harm to their statutory purposes and special qualities***". However this new language sits at odds with, and creates a conflict of policy with, the new CROW Act s85A requirement that planning authorities should "*seek to further the purposes*" for which protected landscapes were so designated. Just avoiding harm (as per new NPPF) is not compatible with seeking to further the purpose of conserving and (note the and!) enhancing their landscapes and natural beauty. New para N4 should, at a minimum, conform to the new CROW Act language.

In the case of major development, the current NPPF para 190 sets two tests – an exceptional circumstance test and a public interest test – both of which have to be met before major development should be permitted within a protected landscape (See "*permission should be refused for major development other than in exceptional*

⁷ CPRE (2026) *Three-quarters want more protection for UK countryside, new poll reveals*
<https://www.cpre.org.uk/news/three-quarters-want-more-protection-for-uk-countryside-new-poll-reveals/>

circumstances, and where it can be demonstrated that the development is in the public interest..”) The new language carefully omits that crucial “and”: (See: “*Proposals for major development within protected landscapes should only be supported in exceptional circumstances where it can be demonstrated that the development is in the public interest.*”) This now elides the two current separate and important tests into a single one. As a result it further obfuscates the need to compare the public interest in conserving and enhancing the natural beauty of protected landscapes against the benefit of more large-scale development to meet a national/local housing shortage. The need for that comparative public interest assessment is not made clear even in the current NPPF (and is often ignored by planning inspectors wilfully or otherwise). The problem will be exacerbated by (i) the new proposed language and (ii) the proposed loss of the current para 189 language about protected landscapes enjoying the highest status of planning protection.

The change from ‘permission should be *refused* for major development other than in exceptional circumstances...’ (current para 190) to ‘should only be supported in exceptional circumstances’ (proposed policy N4.2) is also a significant watering down. This particularly the case when taken in conjunction with the new policy S5.2 says that development can only be resisted where it “would fail to comply with one of the national decision-making policies which state that development proposals should be *refused* in specific circumstances”.

It is essential that amendments are made to section N4 that:

- restore the reference to Protected Landscapes enjoying the highest status of protection from large-scale and other inappropriate development;
- clarify that the exceptional circumstance and public interest tests are separate and cumulative tests, as they hitherto been;
- make explicit the need to determine, in any given case, whether or not the public interest in permitting the proposed development is greater than the public interest in conserving and enhancing the designated landscape.

New footnote (No 71) says “*Where significant harm [from major development] cannot be mitigated, it may be appropriate to consider whether suitable compensation would be acceptable.*” Significant harm to a protected landscape from major development should never be capable of being bought off for money. Footnote 71 and the intention behind it should be scrapped.

Policy DM 10.1.a needs to clarify that Protected Landscapes have to be included within the ambit of Article 4 directions.

Transport

While the aspiration to move away from outdated ‘predict and provide’ approaches to transport is welcome, the proposed transport policies fall short of those needed to reverse the harms from traffic growth and genuinely prioritise active travel and public transport. Indeed, they fall short of policies previously in place from 1994-2012. We strongly support the consultation response made by Transport Action Network, which emphasises the need for policy changes to:

- Avoid creating car-dominated places and traffic growth, in line with the Building Beautiful Commission's conclusions and planning policy prior to 2012 (DP3 & TR1).
- Ensure development and local transport plans are complementary, prioritising the fullest possible use of sustainable modes. We need to plan accessible development with transformational active travel links and public transport upgrades from the start (TR1 and TR3).
- Set maximum car parking standards as the norm in order to deliver modal shift and more efficient use of land. Pre-2012 policy supported national maxima (for cars), car-free developments and controlled parking schemes, all of which are appropriate still in 2026 (TR2).
- Design places so that travel by sustainable modes is the most convenient and popular way to get around. Pre-2012 policy was clear in ensuring development meant “reduced traffic speeds and improved road safety and personal security particularly for pedestrians and cyclists”. The proposal to allow anything to be built unless “unacceptable impact on highway safety” can be proved is wrong (TR4 and TR6).
- Policy TR8 simply aspires to maintain or upgrade existing routes. Particularly in the context of creating healthier places to live, its ambition should be higher to ensure that new footpaths, bridleways and cycle routes can be created where possible, especially where development will take place on currently greenfield sites.

Rural exception sites and rural affordable housing delivery

The strengthening of the rural exception policy is very welcome, provided that:

- “majority affordable” is protected from dilution;
- market housing is tightly controlled;

- exception sites remain small-scale and genuinely local-needs led;
- the environmental and landscape qualities of the site are given substantial weight; HO10 does not make this clear and should be tightened.

Policy HO 8.1.b is unacceptable in that it fails to tackle the series problem of under delivery of affordable homes generally by offering an easy get out to developers to buy their way out of actually providing affordable homes with ‘robust justification’.

Infrastructure

Good infrastructure is absolutely critical to the success of any new development. The proposed NPPF appears to direct plan-makers and decision-makers to allocate sites and approve developments, even in the absence of assurances that adequate infrastructure can or will be provided (PM10, PM14). This is a recipe for failing communities. PM12.4 and DM5 suggest that developers will continue to be permitted to dodge their responsibilities in relation to paying for infrastructure or affordable housing; this should not be allowed, as it contributes to inflated land values and speculation, notwithstanding the intentions of DM5.3.

Development involving peat, coal or onshore oil and gas and other mineral extraction

The changes to explicitly refuse permission for peat extraction (M5), and for many coal and onshore oil and gas schemes, are welcome. However, the policy should be amended such that where applications are granted, conditions must be applied requiring applicants to swiftly restore the site and provide aftercare at the earliest opportunity and in the most environmentally responsible way.

Given the longevity of minerals permissions, it is clearly sensible for the environment to secure performance of restoration conditions in the majority of cases, and not the exceptional case, by bonds or financial guarantees.

We trust that you will amend the draft NPPF text, to take account of our comments, and hence protect our environment and the precious countryside which is valued by so many – while enabling the kinds of development so critical to maintaining thriving communities. In doing so, we urge the Government to recognise that housing targets, governance structures, and economic geographies are all adjustable over time,

whereas the loss of countryside is permanent. The planning system should reflect that asymmetry, ensuring that growth decisions are guided by enduring spatial stewardship rather than immediate supply pressures.

Yours faithfully

Paul Steedman

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