



BPF RESPONSE TO MHCLG'S CONSULTATION ON REFORMS TO THE NATIONAL PLANNING POLICY FRAMEWORK AND OTHER CHANGES TO THE PLANNING SYSTEM

PREPARED AND SUBMITTED BY

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British Property Federation

1. The British Property Federation (BPF) represents the real estate sector – an industry which contributed more than £116bn to the economy in 2020 and supported more than 2.4 million jobs. We promote the interests of those with a stake in the UK built environment, and our membership comprises a broad range of owners, managers and developers of real estate as well as those who support them. Their investments help drive the UK's economic success; provide essential infrastructure and create great places where people can live, work and relax.

General comments

The British Property Federation welcomes the opportunity to respond to this consultation on the revised National Planning Policy Framework. Our members are clear that the draft Framework represents a significant and positive step in the direction of national planning policy. It reflects a stronger recognition of the role that planning must play in supporting economic growth, housing delivery and national productivity.

Across the sectors represented by the BPF, there is broad support for the overall direction of reform. The clearer separation between plan-making and decision-making policies, the more structured drafting approach, and the greater emphasis on delivery and investment provide the potential for a more consistent and predictable planning system. In particular, the Framework demonstrates a more confident expectation that planning should enable development, support investment and unlock long-term economic opportunity.

Key messages

- **The BPF strongly supports the overall direction of reform in the draft Framework.** The clearer separation between plan-making and decision-making policies, alongside a stronger emphasis on delivery and economic growth, represents a significant and welcome shift in national planning policy.
- **Strategic planning should play a stronger role in coordinating housing, employment land and infrastructure provision.** Spatial Development Strategies have the potential to improve planning across functional economic geographies and help address cross-boundary growth challenges.
- **Employment and industrial land needs must be given equal prominence alongside housing.** Industrial and logistics development forms a critical part of national economic infrastructure and planning policy should better reflect how demand for these uses operates across wider economic areas.
- **Viability policy must remain proportionate and flexible to support delivery.** While greater clarity is welcome, overly prescriptive approaches risk front-loading complexity into plan-making and undermining the delivery of development.

Economic growth and the role of planning

Members welcome the increased prominence given to economic development within the Framework. The stronger recognition of sectors such as logistics, freight and digital infrastructure reflects the importance of these uses to the functioning of the modern economy and the resilience of national supply chains. Planning policy should continue to recognise that a wide range of development across the property sector supports economic growth, investment and regeneration, including industrial and logistics space, offices, retail and town centre uses, life sciences and innovation space, and a range of housing products such as build to rent, purpose built student accommodation and retirement living. Ensuring the planning system supports delivery across these sectors will be important in unlocking investment and supporting economic growth across the country.

Industrial and logistics development forms a critical part of the UK's economic infrastructure. The sector supports around 4.5 million jobs across the UK and generates approximately £287 billion in direct and indirect economic activity, while contributing around £84 billion in annual public revenues. These uses underpin supply chains serving businesses, hospitals and households and play an important role in enabling productivity growth and regional economic activity.

More broadly, employment land planning should better reflect how markets operate in practice. Demand for industrial and logistics space often operates across wider economic geographies and can be influenced by market signals that are not always captured through traditional forecasting approaches. Planning policy should therefore encourage plan-makers to consider a broader range of evidence, including market indicators and business engagement, when assessing employment land needs.

Strategic planning and spatial development strategies

The reintroduction of strategic planning through Spatial Development Strategies is a positive and important reform. Our members strongly support planning at Functional Economic Market Area (FEMA) geographies that extend beyond individual local authority boundaries. Strategic planning has the potential to play a valuable role in coordinating housing, employment land and infrastructure provision across wider economic areas, helping to ensure that growth is planned in a coherent and sustainable way.

To realise this potential, the Framework should ensure that strategic planning mechanisms are able to support the identification of locations for large-scale housing and employment development, and provide a stable framework for long-term investment.

Viability and deliverability

The operation of the viability proposals will be critical in determining whether the Framework can deliver the outcomes it seeks. Greater clarity and consistency are welcome, but policy must remain sufficiently flexible to reflect differing market conditions, site characteristics and development models.

If viability provisions become overly prescriptive or require increasingly complex testing at the plan-making stage, there is a risk that disputes are relocated rather than resolved. The Framework should therefore ensure that the viability approach remains proportionate and deliverable in practice, recognising the diversity of development types and delivery models across markets.

In particular, large-scale and long-term development projects, including strategic sites and major regeneration schemes, have very different viability, infrastructure and delivery characteristics compared with smaller, single-phase developments. National policy should recognise this distinction and support appropriately calibrated approaches where necessary.

Density, design and placemaking

Members support the ambition to make more efficient use of land, particularly in well-connected locations. However, policies relating to density and intensification must remain sensitive to local context, land use, market conditions and infrastructure capacity.

Efficient land use should not come at the expense of design quality, placemaking or operational efficiency. National policy should therefore ensure that expectations around density are applied flexibly and continue to support the delivery of well-designed places.

Implementation and guidance

Successful implementation of the revised Framework will depend not only on the policy text itself but also on the clarity and timeliness of supporting guidance. As the structure and terminology of national policy evolve, updated guidance will be essential to ensure consistent interpretation across the planning system. Clear guidance will be particularly important in supporting the operation of the new policy structure, the application of weighting terminology and the practical implementation of viability policies.

Overall position

The BPF strongly supports the direction of travel set out in the draft Framework. It represents a more delivery-focused and economically grounded approach to national planning policy. With careful refinement and clear supporting guidance, the Framework has the potential to provide the basis for a more predictable, pro-growth and genuinely enabling planning system.

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

The principle of statutory National Decision Making Policies (NDMPs) is supported, as they have the potential to improve consistency in decision-making and reduce duplication between national and local policy.

However, if introduced, it will be important that their role within the plan-led system is clearly defined. In particular, national policy and guidance should clarify how NDMPs interact with local plan policies and how any inconsistencies between national and local policy should be resolved in practice.

Clear transitional arrangements and supporting guidance would also be essential to avoid uncertainty during implementation. A carefully phased introduction, supported by updated guidance, would help ensure that NDMPs strengthen the planning system without creating additional complexity or legal uncertainty.

2) Do you agree with the new format and structure of the draft Framework which comprises separate plan-making policies and national decision-making policies?

In general terms, the new format and structure of the Framework are supported.

Separating plan-making policies from national decision-making policies should help improve clarity and usability for practitioners, plan-makers and decision-makers. The revised structure also has the potential to reduce duplication between national and local policy and support a more consistent approach to decision-making.

3) Do you agree with the proposed set of annexes to be incorporated into the draft Framework?

The inclusion of annexes within the Framework is broadly supported where they help clarify definitions, provide technical guidance or support consistent interpretation of policy.

However, where annexes contain more detailed or technical material, it will be important to ensure that they remain sufficiently flexible to adapt to changing circumstances. In some cases, detailed operational guidance may continue to be more appropriately located within Planning Practice Guidance rather than fixed within national policy.

5) Do you agree with the proposed approach to simplifying the terminology in the Framework where weight is intended to be applied?

Simplifying the terminology used to indicate policy weight is broadly supported, as greater clarity can assist decision-makers and practitioners in interpreting policy consistently.

However, it will be important that the Framework provides sufficient clarity regarding how different weighting terms should be interpreted in practice. Without clearer guidance, there is a risk that disputes over the interpretation of weighting terminology could arise, potentially replacing existing uncertainties with new areas of debate.

Clear guidance and consistent application will therefore be important to ensure that the intended benefits of simplified terminology are realised.

2: Plan-making policies

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

There is strong support across BPF members for the principle of Spatial Development Strategies (SDSs) and for reintroducing strategic planning above the level of individual local plans. Industrial and logistics and many other forms of employment development operate across economic geographies that extend well beyond individual local authority boundaries. Strategic planning at this scale is therefore necessary to ensure that housing, employment and infrastructure needs are planned coherently across wider FEMAs.

However, members raised several concerns about how SDSs are framed in the draft Framework, particularly around emphasis, scope, governance and interaction with local plans.

Balance between housing and employment

A consistent concern is that SDSs appear overly housing focused. Policy PM1 explicitly references housing need, while employment and economic uses are folded implicitly into "other uses". This creates an imbalance that is out of step with the substantial weight now afforded to economic development elsewhere in the Framework.

Members agreed that SDSs should:

- explicitly reference employment land requirements;
- place commercial and industrial needs on an equal footing with housing;
- ensure authorities cannot avoid addressing strategic economic needs in full;

Without clearer expectations, there is a risk of replicating past inconsistencies under the Duty to Cooperate, where some areas avoided planning effectively for necessary employment provision.

Strategic role in employment land requirements

Members see significant potential for SDSs to resolve long standing challenges in setting employment land needs across FEMAs. SDSs could provide:

- a strategic level employment requirement across the FEMA;
- a framework for apportioning need across the constituent authorities within that FEMA;
- a mechanism to deal consistently with cross boundary issues where an SDS does not coincide with the full FEMA and relates to only part of it.

Industrial and logistics development, in particular, is highly dependent on strategic spatial planning across FEMAs rather than being constrained to individual local authority boundaries.

Evidence also indicates that historic constraints on industrial and logistics land supply have had measurable economic impacts. Suppressed demand in the sector is estimated to have resulted in around £9.7 billion in lost economic output and approximately 140,000 forgone jobs between 2010 and 2024. Strategic planning

mechanisms, such as Spatial Development Strategies, therefore have an important role in ensuring sufficient land is identified across FEMAs to support future growth.

To support this, national guidance through the Planning Practice Guidance will need to offer a more robust methodology for assessing employment need, providing a clearer evidential basis comparable, though not identical, to the housing standard method. The BPF has previously advocated that a “suppressed demand” methodology, which accounts for historic undersupply of employment land, should be introduced, as highlighted in our Levelling Up: The Logic of Logistics report (2022).

Alignment with FEMAs

The Framework should ensure that SDSs:

- identify broad locations for strategic employment development within which strategic industrial and logistics sites can be allocated through Local Plans;
- align with FEMAs rather than solely administrative boundaries
- ensure employment land needs are assessed across economic geographies that reflect how businesses and supply chains operate in practice.

Where FEMAs cross SDS boundaries, there should be a clear expectation that relevant authorities cooperate to assess and meet employment land needs in full across the wider economic area.

We welcome the government’s programme of devolution and the introduction of Spatial Development Strategies (SDSs), which represent an important shift toward strategic plan making. SDS geographies should reflect functional economic areas shaped by labour markets, supply chains, strategic transport corridors and investment patterns, rather than administrative convenience alone. This alignment is particularly important for industrial and logistics development, a foundational sector underpinning the wider economy, where connectivity and established employment linkages are critical. While the Industrial Strategy identifies eight priority growth sectors, foundational sectors such as industrial, logistics and freight must also be embedded within SDSs to ensure these growth sectors can operate and expand effectively.

Corridor based spatial planning

Members strongly supported the reference in Policy PM10 to identifying optimal growth locations along key transport corridors. Unlike local plans or local growth plans, SDSs are uniquely positioned to:

- plan growth aligned with major transport and infrastructure corridors;
- shape development around FEMAs rather than administrative boundaries;
- ensure employment land provision is balanced across wider economic geographies.

Maintaining and strengthening this policy hook is seen as important, especially as many of the key sectors specified within the Industrial Strategy (IS-8) do not have a corridor-led growth focus.

Relationship with local plans

Members were concerned about how SDSs will align with the proposed 30-month timetable for local plan preparation, particularly given the time SDSs themselves will take to prepare. There is a risk that:

- authorities delay progressing their local plans while waiting for SDSs;
- plans adopted before SDSs may not have been subject to sufficient strategic scrutiny;
- joint local plans may defer strategic issues to future SDSs despite already operating at a sub regional scale.

Clearer guidance is therefore needed on:

- how local plans proceed where SDSs are emerging but not yet in place;
- how soundness will be assessed during this transitional period;
- the expectation on joint local plans to continue addressing strategic employment issues.

Governance and geography

Uncertainty remains about who initiates and leads SDS preparation. While Government have recently published an SDS map linked to devolution geographies, the reality is currently uneven:

- long established combined authorities (for example Greater Manchester and the Greater London Authority) are well placed to lead;
- emerging county combined authorities vary significantly in readiness;
- many areas remain outside any devolution framework.

Members consider that the Framework should provide a clearer account of:

- which bodies are responsible for producing SDSs;
- how SDS geographies will be finalised;
- how SDSs integrate with national infrastructure planning and any future New Towns programme.

Without this clarity there is a risk that strategic planning proceeds unevenly across the country.

Planning horizons and long-term certainty

Industrial and logistics development often requires long term investment horizons that exceed the timeframe of typical local plans. Members therefore welcome the proposed 20 year horizon for SDSs, particularly in relation to new settlements and strategic employment schemes.

There may also be merit in exploring longer spatial planning horizons in certain circumstances, potentially up to 30 years, particularly where SDSs are identifying broad locations for large scale strategic development. There are concerns from Members, however, that such long term planning is susceptible to political cycles and changing priorities of different party political agendas.

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?

a) If not, do you think there should be a different approach, for example, that alterations should only be made to spatial development strategies every five years where there are significant changes to housing need in the strategy area?

Given the speed of economic, social and technological change, reviewing SDSs at least every five years is important to ensure that housing requirements remain accurate and reflective of changing conditions within the strategy area. This should be extended to employment uses too as employment requirements can change similar to housing. Indeed, there is a relationship between I&L and housing that previous BPF research has highlighted.

Review mechanisms also provide an opportunity for the planning system to respond to innovation and changing practices. For example, more regular reviews may encourage better adoption of emerging Property Technology (PropTech) solutions and digital planning tools, which are evolving rapidly. Waiting long periods to update strategic planning frameworks risks planning systems becoming outdated relative to the pace of technological change.

However, members do not consider that alterations should necessarily be required every five years. Instead, the requirement should be for a formal review to determine whether changes are needed.

Long term strategies remain essential to provide certainty for major infrastructure and development projects. Large strategic developments such as new settlements, major infrastructure projects or long term regeneration programmes require stable planning frameworks to support investment and delivery.

A 20-year strategic timeframe combined with a formal review every five years could therefore provide an appropriate balance between long term certainty and responsiveness to changing conditions.

8) If spatial development strategies are not altered every five years, should related policy on the requirements used in five year housing land supply and housing delivery test policies, set out in Annex D of the draft Framework, be updated to allow housing requirement figures from spatial development strategies to continue to be applied after 5 years, so long as there has not been a significant change in that area's local housing need?

If SDSs are not fully updated every five years, policy in Annex D should only allow housing requirement figures to continue to apply where a formal review confirms that there has been no significant change in local housing need or wider strategic circumstances.

This approach would ensure that five year housing land supply and Housing Delivery Test policies remain grounded in robust and credible evidence, while avoiding unnecessary revisions to strategic planning frameworks.

Accuracy in housing need assessments is fundamental to maintaining investor confidence and ensuring that the housing market is delivering the tenure mix required in local areas. A structured review mechanism provides an appropriate balance between certainty and flexibility, ensuring that housing requirements remain evidence based and reflective of changing conditions.

Finally, members emphasised the potential for SDSs to provide greater stability across political cycles, which has historically been a challenge for long term investment in strategic housing and employment projects. Well established SDSs could provide:

- protection for broad locations for growth, with changes permitted only in exceptional circumstances;
- greater certainty for investors in new settlements and long term employment schemes;
- a framework that reduces the risk of shifts in political control undermining major multi decade projects.

16) Does PM12 increase certainty at plan making stage regarding contributions expected from development proposals?

We support the principle of providing clearer expectations regarding developer contributions at the plan making stage. Greater transparency about the scale and nature of expected obligations can improve predictability for developers, communities and local planning authorities. However, we do not consider that Policy PM12, as currently drafted, will deliver the intended certainty in practice.

The policy assumes that contributions can be sufficiently specified, and viability sufficiently resolved, through the plan making process to reduce negotiation at application stage. In practice, this does not reflect how development proposals evolve. The factors that ultimately determine viability and the scale of section 106 obligations, including scheme design, phasing, infrastructure delivery and mitigation requirements, are frequently only known once proposals reach the decision making stage.

Attempting to resolve these issues at plan stage risks producing evidence that is either too high level to be relied upon, or so detailed that it becomes unrealistic to prepare within plan making timescales and resources. As a result, the policy may create an expectation of certainty that cannot realistically be achieved.

The policy also does not address the wider context of development costs and obligations. An increasing number of requirements operate as fixed or ringfenced costs within development appraisals, while affordable housing is often treated as the primary variable when viability pressures arise. This dynamic can lead to affordable housing being disproportionately reduced to accommodate other costs, undermining both delivery and affordable housing objectives.

It is also important to recognise that section 106 obligations are fundamentally a mitigation mechanism intended to make development acceptable that would otherwise be unacceptable. Moving towards a more tariff-like approach, without sufficient scope for bespoke mitigation and prioritisation, risks weakening this

function. Where additional requirements emerge through technical assessment at application stage, policy should provide a clear and proportionate route to address them without creating an unrealistic cumulative burden.

Plan stage expectations should therefore focus on establishing a clear framework for contributions rather than attempting to resolve viability and infrastructure funding in full. This would better reflect the realities of development delivery while still improving transparency and predictability.

We therefore recommend that PM12 is amended to:

- provide clearer differentiation for strategic and super strategic sites, with appropriate thresholds and tailored expectations reflecting the complexity and long delivery periods associated with such schemes;
- require plan makers to demonstrate explicitly how viability evidence has accounted for the full set of development costs and obligations expected to apply in the plan area;
- strengthen the link between contribution expectations and the Infrastructure Delivery Plan, including greater clarity on how infrastructure will be delivered and funded;
- avoid drafting that enables certain contribution demands to be treated as unchallengeable irrespective of viability evidence;
- confirm that plan stage certainty should not remove the need for proportionate flexibility at decision making stage where scheme specific circumstances or market conditions change.

17) Do you agree that plans should set out the circumstances in which review mechanisms will be used, or should national policy set clearer expectations?

Plans can appropriately identify the circumstances in which review mechanisms may be used in principle, particularly for large or long term developments where phasing and changing market conditions introduce uncertainty. However, we do not support review mechanisms being defined in detail at the local plan level without clearer national expectations.

Experience in London illustrates the risks associated with poorly calibrated review mechanisms. While challenging viability conditions are not unique to London, the capital has been particularly affected in recent years. In 2025 only 613 Build to Rent homes were started in London, representing an 80% decrease on 2024 levels, and planning constraints are a contributing factor.

Under the 2017 London Plan Supplementary Planning Guidance, review mechanisms, particularly late stage reviews, have become increasingly problematic as the industry faces more challenging development viability conditions. Late stage reviews often operate in a one-sided manner, requiring additional contributions where viability improves while offering no equivalent flexibility when market conditions deteriorate and viability becomes constrained.

This imbalance undermines investor confidence because developers cannot accurately price their obligations at the funding stage. The resulting uncertainty can hinder site acquisition and delay or prevent

development. Despite being well intentioned, review mechanisms imposed by local planning authorities can therefore undermine delivery if they are poorly designed.

For this reason, national policy should set clearer expectations about the principles governing review mechanisms. These should include proportionality, transparency, fundability and deliverability. Plans could then apply these principles in a way that reflects local circumstances and the characteristics of different forms of development.

Government may also wish to consider strengthening existing mechanisms within the planning system rather than relying primarily on new review mechanisms. Section 106 review clauses are already commonly used to address stalled or non viable developments, but they are not designed to unlock schemes that are already stuck in the planning system.

One potential route would be to revisit the lesser used application process under section 106A(3). This mechanism is currently constrained by the five year rule and uncertainty over whether modifications continue to serve a useful purpose. Its effectiveness could be improved by reducing or removing the time limit and clarifying that obligations which demonstrably impede delivery on viability grounds may be considered as no longer serving a useful purpose.

Reforming this mechanism could provide a more balanced and workable route for addressing viability challenges over the lifetime of a development, while maintaining confidence that planning obligations remain proportionate and deliverable.

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

We support a more “rules-based” approach and would welcome more consistency in the planning system in relation to the setting of environmental standards. **As such we support policy PM13 on setting local standards.**

We also support the stronger signposting of building regulations in this context.

However, we note that the NPPF is only one material consideration, so interpretation and approach will still vary. Some members have asked what impact the new PM13 will have in practice.

Members have also pointed to a potential conflict between policy PM13 and other NPPF policies, such as policy CC1 (Planning for Climate Change) which states that “development plans should take a proactive approach to mitigating climate change and supporting the transition to net zero”.

We have also had questions about the focus on energy efficiency in this proposal. There are a range of regulatory and market factors which drive the adoption of high energy efficiency standards in new developments, outside of the planning system, and PM13 is unlikely to change this. The real challenge that our members face in relation to variation in environmental standards relates to carbon standards (both operational and embodied carbon) and the sometimes very different approaches taken by local planning

authorities. We note that embodied carbon is not mentioned in the consultation paper and is outside Building Regulations. It is not clear that PM13 does anything to help address this challenge.

Members would also welcome clarity on:

- the intended impact of PM13 on commercial development, as the consultation paper only references residential development (“...local plans should not set higher energy efficiency standards for residential development”);
- the impact on certification standards such as BREEAM; and
- how PM13 sits alongside the Government’s devolution agenda, and whether our major city regions will have more flexibility to vary standards in their own plans.

3: Decision-making policies

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

Overall, members were supportive of the direction of travel in the decision making chapter, recognising a genuine attempt to streamline processes, reinforce proportionality, and encourage more timely, positive engagement between applicants, consultees and local planning authorities.

Members welcomed the intention behind DM1 and DM3 to make decision making more positive, proactive and proportionate. These policies are seen as constructive attempts to rebalance expectations around how applicants, planning officers and consultees engage during the determination of planning applications.

Key points included:

- The emphasis on proportionate information requirements is helpful and reinforces that engagement and supporting material should reflect the scale and complexity of the proposal, rather than defaulting to unnecessary or exhaustive documentation.
- The expectation that authorities should work in a positive and proactive manner was widely supported. Members noted that delays often arise where statutory and internal consultees miss response deadlines, and this policy direction provides a useful lever to challenge such drift.

Overall, these provisions were regarded as pragmatic and capable of improving the process, although their effectiveness will depend heavily on resourcing and culture within authorities.

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

There was strong support for DM2 and the intention to create a more consistent and rationalised approach to information requirements at validation stage.

Members highlighted persistent issues with excessive or inappropriate requirements in some authorities, including:

- demands for ecological surveys long before seasonal windows permit them;
- outline applications delayed due to requests for minimum and maximum building dimensions beyond what outline consent requires;
- applications placed on hold for many months pending minor or non material documents.

Members agreed that:

- a national validation list is essential;
- Annex C currently provides too little detail and will need strengthening;
- authorities should feel empowered to validate applications without waiting for every consultee to confirm that all information is present.

23) Do you have any views on whether such a policy could be better implemented through regulations?

Implementing clearer expectations through regulations could be positive, particularly where policy seeks to improve consistency and set clearer parameters for how requirements are applied.

The size and complexity of planning applications has historically created uncertainty and administrative burdens for both applicants and local planning authorities. Clearer regulatory guidance could help improve expectation setting from the outset and ensure greater consistency in application.

However, any regulatory approach must ensure requirements remain proportionate and aligned with wider policy objectives, avoiding unnecessary procedural burdens that could slow delivery.

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

Members welcomed the intention behind DM3 to promote more positive, proactive and proportionate decision making.

Members were clear that DM3 can only improve decision making if statutory consultees (including highways, ecology, drainage and environmental health) operate within firm timeframes.

Key points included:

- internal delays frequently derail determination timescales, with officers often waiting months for consultee comments;
- DM3 provides helpful wording that applicants can reference when pushing for timely engagement;
- the policy still contains a "tailpiece" allowing officers to delay decisions if they deem consultee input essential.

Members also welcomed the reference to a 21 day consultation period, although noted that officers may still feel unable to progress applications without consultee responses.

Without stronger accountability mechanisms behaviour may not materially change, but members agreed DM3 is a step in the right direction.

25) Do you agree that policy DM5 would prevent unnecessary negotiation of developer contributions, whilst also providing sufficient flexibility for development to proceed?

We do not consider DM5, as drafted, will prevent unnecessary negotiation.

While the intention is to restrict viability assessment at decision making stage, the criteria in DM5 are likely to create additional dispute about whether the gateway tests are met rather than reducing negotiation. Terms such as "significant difference", "substantially different" and "demonstrably unforeseen costs" are inherently subjective and will invite argument.

DM5 also relies heavily on plan stage viability evidence, which may be out of date or may not exist in areas without an up to date plan. The approach does not sufficiently address how decision making should function in these circumstances, despite the fact that a significant proportion of delivery in many areas comes forward on unallocated or non plan supported sites.

For the largest phased schemes DM5 should be clearer and more permissive. These schemes often involve long periods of negative cash flow, complex infrastructure sequencing and exposure to market volatility. A rigid approach to decision stage viability risks undermining delivery.

We support the objective of reducing protracted negotiations and increasing certainty. However, viability cannot be fully resolved at Local Plan stage alone. Plan level testing is necessarily high level and cannot account for the detailed design, financing structure and delivery constraints that emerge once a scheme progresses.

A blanket reliance on Local Plan viability risks being insufficiently responsive to market changes and site specific realities. DM5 will only prevent unnecessary negotiation if it also allows proportionate flexibility where genuine viability issues arise at application stage.

26) Do you have any further comments on the likely impact of policy DM5: Development viability?

We support a plan led system where policies are informed by robust evidence. However, it is not realistic to assume viability can be fully resolved at plan stage for all developments and then treated as fixed.

Viability evidence can become outdated quickly in volatile market conditions, and there is a risk that plan stage viability and obligations setting becomes politicised with policies set above evidenced deliverable levels.

If applied too rigidly, DM5 could inadvertently stall schemes, particularly in volatile markets. Viability is highly sensitive to changes in build costs, sales values, interest rates and investor appetite. Recent market instability since 2022 illustrates how quickly development conditions can change.

Conversely, a clear and proportionate framework, combined with flexibility, transparency and standardised appraisal approaches, could improve confidence and reduce disputes. Policy must recognise that detailed scheme level evidence will often reveal a different viability position from strategic modelling.

We recommend DM5 is amended to:

- define key terms such as “typology” and “significantly” or “substantially different” to reduce dispute and litigation risk;
- provide clearer, objective triggers for when decision stage viability evidence is acceptable, including explicit recognition of plan currency and market volatility;
- provide a differentiated approach for strategic and super strategic sites and complex phased schemes;
- ensure the policy reduces delay and dispute rather than shifting debate to gateway tests.

Flexibility for amending obligations

We are concerned that the overall direction of the proposals risks clamping down on flexibility at precisely the time flexibility is needed to support delivery in a challenging market. Clearer guidance is needed on the appropriate use of existing statutory mechanisms for modifying obligations and conditions in viability related circumstances.

27) Do you have any views on how the process of modifying planning obligations under S106A could be improved?

The current S106A process can be slow and uncertain. Improvements could include:

- clearer national guidance on when viability based modification is appropriate;
- defined determination timescales
- greater standardisation of viability evidence requirements;
- a more transparent and proportionate appeal route.

Certainty over process is essential to avoid schemes becoming stalled while modification is negotiated.

28) Do you have any views on how the process of modifying planning obligations could be improved in advance of legislative change?

Ahead of legislative reform, improvements could be made through guidance and practice, including:

- supporting faster decision making through adequate resourcing of local planning authorities;
- encouraging early and open book engagement between applicants and authorities;
- promoting consistent viability methodologies;
- ensuring review mechanisms are genuinely two way and responsive to market movements.

Ultimately, while setting viability expectations at Local Plan level provides clarity, it cannot replace detailed scheme level assessment. Policy should strike a balance between certainty and realism, ensuring affordable housing ambitions remain deliverable and grounded in market realities.

29) Do you agree with the approach for planning conditions and obligations set out in policy DM6?

Simplification of planning conditions (DM6) is welcomed, particularly where it reduces duplication of matters already covered by other regulatory regimes.

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

DM7's clarification of how planning interacts with other regulatory controls is useful, though it may need to go further to avoid overlapping requirements.

31) Do you agree with the new intentional unauthorised development policy in policy DM8?

Members saw value in the clearer articulation of enforcement powers, although the effectiveness of enforcement is likely to depend more on resourcing than on additional policy wording.

32) Are there any specific types of harm arising from intentional unauthorised development which we should consider?

Members did not raise specific concerns beyond the importance of ensuring enforcement powers are supported by adequate resourcing and consistent application.

33) Do you agree with the new Article 4 direction policy in policy DM10?

Members briefly touched on Article 4 directions and Local Development Orders but did not raise specific concerns beyond the need for clarity and consistency in application.

4: Achieving Sustainable Development

34) Do you agree with the proposed approach to setting a spatial strategy in development plans?

Members broadly welcomed the clearer articulation of sustainable development principles in Chapter 4 and noted that the new policies (S1–S6) provide a more spatially conscious approach than the existing NPPF presumption.

The shift to a spatial presumption, with S1 covering plan making, S2 establishing a requirement for a clear spatial strategy, and S3 replacing the decision making limb of current paragraph 11, was generally seen as sensible.

However, two key concerns emerged.

a. Lack of explicit reference to employment needs in S1

Members argued that S1 should mirror the balance seen elsewhere in the framework and explicitly reference employment needs, rather than focusing implicitly on housing.

This would ensure:

- employment land requirements are treated as a core part of sustainable development;
- consistency with the substantial weight afforded to economic development elsewhere in the framework;
- avoidance of an unintentional housing-led reading of the presumption.

b. Internal inconsistency in how “the framework as a whole” is used

Members noted that the NPPF distinguishes between the plan making and decision making parts of the framework, yet S1 continues to use wording referring simply to “the framework as a whole”.

This could create confusion about whether both halves must always be treated together.

35) Do you agree with the proposed definition of settlements in the glossary?

Interpretation of the spatial policies in this chapter will depend heavily on how “settlements” and settlement boundaries are defined.

Members noted that the operation of policies S4–S6 will depend on how settlements and settlement boundaries are interpreted in practice, including whether authorities produce supplementary guidance or maps identifying areas as being “in” or “out” of settlement, and how these definitions interact with local plan spatial strategies.

There was concern that, without clearer national guidance, different authorities may develop their own interpretations or mapping approaches. This could create inconsistencies in how the policy is applied, similar to those seen in the interpretation of grey belt policy.

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

Members broadly welcomed the move to a clearer spatial presumption structure across S1–S3. However, concerns remain about the balance of the presumption where employment needs are not explicitly referenced in S1. Members argued that employment land requirements should be clearly recognised as a core component of sustainable development alongside housing delivery.

Members again highlighted potential confusion arising from continued reference to “the framework as a whole”, despite the clearer distinction between plan making and decision making policies elsewhere in the draft.

37) Do you agree to the proposed approach to development within settlements?

S4 prompted mixed reactions.

Some members welcomed the formalised presumption for development within settlements. Others found the policy unclear and potentially over-permissive, particularly in relation to the erosion of brownfield industrial sites for alternative uses.

There was also uncertainty about whether S4 could diminish the role of local plans by allowing schemes to come forward simply by meeting the criteria set out in the policy.

Members suggested clearer guidance is needed on the relationship between S4 and local plan allocations, particularly for urban employment sites.

38) Do you agree to the proposed approach to development outside settlements?

Members raised concerns that Policy S4, which establishes principles around development within settlements, may set a high bar for development outside settlement boundaries.

While the policy allows development where benefits outweigh harms, the drafting could create uncertainty where interpretation becomes heavily reliant on appeal decisions.

Policy S5 attracted significant discussion at member roundtables, reflecting its importance for industrial and logistics development.

Members welcomed that S5 helps correct the previous situation where:

- Green Belt land with “grey belt” characteristics could sometimes be easier to develop than open countryside;

- open countryside sites in optimal strategic locations often lacked a clear policy hook.

S5 provides a clearer route for considering suitably located employment sites outside settlements. However, the term “well related to a settlement” was considered vague and potentially open to restrictive interpretation. Members noted that this could generate unnecessary friction unless clarified.

Several members also argued that if the framework recognises the locational requirements of storage and distribution uses in S5, this logic should also be reflected in Green Belt policy rather than relying solely on grey belt tests that may not align with strategic road and rail junctions.

Members also noted that elements of the policy appear to be drafted through a residential lens, for example:

- references to “groups of houses” in S5E;
- infilling criteria framed around residential patterns;
- no explicit acknowledgement of non-residential settlement edges.

This could create unintended barriers for commercial and industrial proposals.

39) Do you have any views on the specific categories of development which the policy would allow to take place outside settlements, and the associated criteria?

Members raised concerns about inconsistent terminology used throughout the chapter, particularly within S5J.

The draft refers interchangeably to storage and distribution, logistics and freight, sometimes in isolation from other industrial uses, such as general and advanced manufacturing (Class B2) and light industrial (Class E(g)(iii)). Members stressed that most modern logistics parks also accommodate significant proportions of light industrial and other B2 uses.

The current drafting risks implying that industrial development outside settlements is justified only where framed as storage and distribution (Class B8). This misrepresents how the market operates and could unintentionally constrain high-value industrial activity.

Members therefore considered that the policy should refer more broadly to employment uses supporting the modern economy, with storage and distribution given as an example rather than the sole focus. Policy S5 introduces a spatial presumption allowing certain logistics development outside settlement boundaries, which is a positive step in recognising the unique locational requirements of the sector.

However, the policy is framed largely around freight and logistics uses, which risks unintentionally excluding wider industrial activity.

Many industrial and logistics developments are delivered with flexible use classes (E, B2 and B8) to support evolving business needs.

The BPF therefore recommends that Policy S5 be broadened to include:

- industrial uses (B2);
- flexible employment uses;
- data centres, recognising their role as critical national infrastructure.

Industrial and logistics development is also a major driver of national investment and productivity. The sector supports a wide range of economic activity across supply chains, from advanced manufacturing and data centres to last-mile distribution facilities. Growth in these sectors is expected to continue, supported by structural trends such as e-commerce expansion and supply chain reshoring.

This would ensure the policy reflects the modern reality of employment development.

40) Do you agree with the proposed approach to development around stations, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12?

Members supported the principle of enabling development around railway stations but raised concerns about drafting clarity.

“Reasonable walking distance” was welcomed as a flexible concept, and members preferred it to a fixed 800m standard, which would be overly restrictive.

However, as drafted the policy may generate disputes about:

- where walking distance is measured from;
- how the policy applies to very large sites;
- whether any part of a large site triggers policy support for the entire scheme;
- how station “sites” are defined, particularly where rail infrastructure extends over long distances.

Members suggested this could become one of the most litigated elements of the new framework unless clearer guidance accompanies it.

41) Do you agree that neighbourhood plans should contain allocations to meet their identified housing requirement in order to qualify for this policy?

Members did not raise specific concerns about neighbourhood planning requirements within this chapter. However, members emphasised that the effectiveness of the spatial policies will depend on how they interact with local plan strategies, settlement definitions and the wider spatial strategy.

5: Meeting the challenge of climate change

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

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

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

45) Does the policy on wildfire adaptation clearly explain when such risks should be considered and how these risks should be mitigated?

We welcome the sharper focus on tackling climate change in the consultation paper and support measures that encourage a more proactive approach to both mitigation and adaptation, in a way that links to other relevant policies in the draft Framework.

We support the inclusion of wildfires in the list of climate risks.

The consultation paper notes that the proposed reforms will “give substantial weight to the benefits of improving the energy efficiency of existing buildings or drawing energy from district heat networks, and renewable and low-carbon sources.” Our members have asked how this will align with the proposed reforms in PM13. Members have also asked if the push to connect to district heat networks will be limited to low carbon heat networks.

47) Do you have any other comments on actions that could be taken through national planning policy to address climate change?

As mentioned in our response to question 18, there is nothing in the consultation paper that addresses concerns over the setting of standards in relation to embodied carbon. This might be explored in future, in close consultation with industry.

6: Delivering a sufficient supply of homes

48) Do you agree the requirements for spatial development strategies and local plans in policy HO1 and policy HO2 are appropriate?

The existing level of prescription to local planning authorities (LPAs) in assessing and incorporating the housing needs of different groups when establishing overall housing need is insufficient. In practice, this leads to a lack of transparency regarding the needs of different groups within local communities and inconsistency in local planning policy.

It also risks creating a presumption toward market housing for sale at the expense of housing for other groups – including renters, who now make up around a fifth of all households. Where local authorities fail to assess and set ambitions regarding the need for homes of different tenures, they risk failing to address the needs of all groups effectively.

This uncertainty increases the likelihood of speculative applications and appeals. Rewording the NPPF to require authorities to assess and publish need for different groups as part of plan-making would support schemes that address genuine housing need and provide developers with greater certainty over housing targets, land supply and policy requirements. This would reduce delays between site identification, allocation and consent.

Clear, robust and disaggregated housing need evidence would also reduce legal challenge and appeal risk, shortening decision-making timelines and enabling schemes to move more quickly from allocation to delivery.

Additionally, there is often a focus at local authority level on mixed development schemes. In practice, s106 housing within mixed developments can be difficult to transfer where viability constraints mean units cannot be sold to registered providers. This can stall both affordable housing provision and the wider scheme. For smaller schemes, mono-tenure delivery can sometimes provide a more practical solution. Additional guidance on tenure requirements would therefore help ensure schemes respond more directly to identified housing need.

49) Is further guidance required on assessing the needs of different groups, including older people, disabled people, and those who require social and affordable housing?

Strongly agree.

As noted in response to Question 48, assessing housing need must account for the types of homes required to meet the needs of the local area. Further guidance on calculating the housing needs of different groups, alongside stronger expectations for authorities to assess and set ambitions for delivery, would support more robust and defensible housing strategies.

This would also support faster take-up of new homes, quicker build-out rates and improved investor confidence, encouraging greater investment into local areas.

Members also noted that strengthening requirements relating to social and affordable housing could have knock-on impacts for sites in lower value areas or those already facing viability challenges.

52) Do you agree the new Annex D to the draft Framework is sufficiently clear on how local planning authorities should set the appropriate buffer for their local plan 5-year housing land supply?

Greater clarity is welcome. However, the buffer will only be meaningful if applied to an accurate and comprehensive housing need requirement.

If housing need is too narrowly defined – for example if it is conflated with social rent alone and does not reflect tenure diversity – the buffer risks being applied to a distorted baseline.

53) Do you agree the new Annex D to the draft Framework is sufficiently clear on the wider procedural elements of 5-year housing land supply, the Housing Delivery Test and how they relate to decision-making?

The additional procedural clarity is helpful.

However, overly rigid affordable housing thresholds and tenure splits can undermine deliverability, which in turn affects recorded delivery and performance under the Housing Delivery Test. Clear procedures must therefore be matched by realistic and evidence-based requirements that remain flexible enough to accommodate changing market and delivery conditions.

55) Do you agree the plan-making requirements, for both local plans and spatial development strategies, in relation to large scale residential and mixed-use development are sufficiently clear?

The policy should apply equally to New Towns once confirmed, ensuring that they are embedded within spatial development strategies and local plans, with clear expectations – alongside sufficient flexibility – on infrastructure alignment, delivery trajectories and tenure diversity.

There was general support for the intent of HO4, which seeks clearer identification of locations for new settlements, significant extensions and urban quarters. However, members raised several concerns about wording and implementation.

HO4 refers to “new settlements”, while the body of the policy later refers to “new town principles” for design quality. Members suggested the opening paragraph should explicitly reference new towns, as the latter term carries specific meaning in planning and infrastructure policy.

Several members also expressed concern that HO4(2)(A) could encourage authorities to impose overly prescriptive master planning requirements at plan-making stage. Examples were given of local plan policies requiring an entire masterplan to be approved before applications can proceed, or imposing rigid design code expectations that undermine flexibility over long build-out periods.

Members emphasised that the policy should support broad strategic frameworks rather than detailed prescriptions that constrain delivery.

HO4(2)(B) also encourages local plans to identify ways to support rapid implementation. Members noted it is unclear what local plans can realistically do to achieve this, and that later references to shortened commencement periods were viewed sceptically.

Members welcomed recognition of mixed tenure but stressed that tenure needs evolve over the life of large schemes. Authorities should therefore avoid treating initial tenure expectations as fixed or binding.

56) Do you agree our proposed changes to the definition of designated rural areas will better support rural social and affordable housing?

We support the objective of strengthening delivery of social and affordable housing in rural areas, where affordability pressures can be acute and delivery has historically been constrained. However, careful consideration must be given to viability impacts on small sites, particularly in rural markets where development costs are often higher and sales values more variable.

Minor schemes are frequently delivered by SMEs, which can be disproportionately affected by viability pressures. Policy should therefore be accompanied by clear guidance ensuring requirements remain proportionate, evidence-based and subject to viability considerations where necessary.

59) Do you agree the proposals to support the needs of different groups, through requiring authorities to identify sites or set requirements for parts of allocated sites are proportionate?

We welcome the acknowledgement of alternative forms of housing such as PBSA. However, the guidance should also reference Build to Rent and large-scale shared living.

Recognising diverse tenures within plan-making is important to ensure housing need is understood across the full spectrum of demand. Explicit recognition of Build to Rent would support delivery of genuinely additional, high-quality homes for renters.

On large or strategic allocations, identifying opportunities to accommodate different groups can be proportionate and effective. However, local plans should avoid being overly prescriptive about the precise location or configuration of these uses within sites.

Delivery models, operator requirements and funding structures – particularly for PBSA and Build to Rent – are highly scheme specific. Excessive rigidity at allocation stage risks constraining viability and delivery.

60) Do you agree with our proposals to ask authorities to set out requirements for a broader mix of tenures to be provided on sites of 150 homes or more?

We support the objective of promoting tenure diversity on larger sites. Developments of this scale can often accommodate a range of housing products, which can broaden market absorption and support more resilient build-out.

However, the 150-home threshold should act as a prompt for consideration rather than a trigger for fixed tenure prescriptions. The appropriate mix will vary depending on local housing need, site characteristics and market context.

Authorities should therefore set strategic expectations informed by evidence while allowing flexibility at application stage to ensure schemes remain viable and deliverable.

63) Do you agree that proposals to add military affordable housing to the definition of affordable housing will successfully enable the provision of military homes?

We support recognising military affordable housing within the definition of affordable housing where need is clearly evidenced.

Providing clarity that such provision can count toward affordable housing requirements should remove uncertainty and help facilitate delivery aligned with operational needs.

65) Would requiring a minimum proportion of social rent support the delivery of greater number of social rent homes?

While we recognise the intention behind this proposal, a nationally prescribed minimum – such as 10% – may not be appropriate in all markets.

Flexibility to recognise changing market conditions, funding availability and registered provider appetite is essential. A rigid minimum could risk stalling schemes or reducing overall delivery where developments become unviable.

A more effective approach would be to strengthen local evidence requirements and ensure plans clearly justify social rent expectations based on need and viability.

66) Are changes to planning policy needed to ensure that affordable temporary accommodation, such as stepping stone housing, is appropriately supported, including flexibilities around space standards? a) If so, what changes would be beneficial?

Recognition of Stepping Stone homes within the planning system

The BPF supports the Youth Chapter Collective's proposal to recognise *Stepping Stone homes* as a distinct affordable housing product within the planning system. We agree that greater clarity in national policy would help facilitate the delivery of this model and support more young people in employment to access stable, affordable housing.

Stepping Stone accommodation, such as Centrepoin't's Independent Living scheme and St Basil's Live and Work programme, provides genuinely affordable transitional housing for young people who are in work or undertaking apprenticeships but who would otherwise struggle to access housing in the private or social rented sectors. These homes typically offer time-limited accommodation, often between two and five years, allowing residents to build financial resilience, develop independent living skills and prepare to move into longer-term housing.

At present, the absence of formal recognition within planning policy can create uncertainty in the planning process, particularly where local authorities apply Nationally Described Space Standards through their local

plans. Recognising Stepping Stone homes within national policy, whether through the NDSS, use classes or a National Development Management Policy, would provide greater clarity for local planning authorities and support the scaling up of this important housing model.

67) Do you agree that applicants should have discretion to deliver social and affordable housing requirements via cash payments in lieu of on-site delivery on medium sites?

There is a strong case for allowing discretion, particularly on small and medium-sized schemes where on-site delivery can be impractical.

Registered providers are often unwilling to acquire small clusters of s106 units, particularly where schemes include review mechanisms or where management costs are disproportionate. In such cases, cash contributions can provide a pragmatic solution.

For medium sites (potentially under 50 units) cash contributions may allow affordable housing to be delivered more efficiently elsewhere at scale.

However, clarity is needed on the definition of "medium site". The interaction with CIL charging schedules must also be carefully considered, as developers may lose access to social housing relief where on-site provision is replaced with cash contributions.

72) Do you agree the criteria regarding locations of specialist housing for older people?

We broadly agree with the proposed locational criteria, particularly the emphasis on access to services, public transport and community infrastructure.

Given the UK's ageing population, planning policy should give greater weight to specialist housing for older people. Such housing can support independent living, improve health outcomes and help release mainstream housing stock.

73–74) Specialist accommodation, PBSA and large-scale shared living

The proposed locational criteria, particularly the emphasis on sustainable and well-connected locations, are generally appropriate.

We welcome the introduction of a definition of large-scale shared living in Annex B. However, the definition will be outdated once the Renters' Rights Act 2025 comes into force, which abolishes fixed-term assured tenancies. The suggestion that tenancies should be for a minimum of three months will therefore not reflect the future legal framework.

A similar issue arises in the definition of Build to Rent and will also require amendment.

In addition, PBSA is referenced throughout the chapter but not defined within the framework. Including a definition would support consistent interpretation by local planning authorities.

80) Do you agree policy HO13 will help ensure development proposals are built out in a reasonable period?

The intent is supported. Recognising tenure mix, market absorption and site history is important to ensure build-out expectations are realistic. Different tenures absorb at different rates. For example, Build to Rent schemes typically deliver homes more quickly because they are delivered as a single product rather than through individual sales.

However, concerns were raised about proposals to shorten commencement periods below the standard three years. Large sites often depend on discharging complex pre-commencement conditions, and shortening timelines could cause permissions to lapse and slow delivery.

81) Do you agree the flexible consenting framework for large scale development is sufficient?

Greater flexibility for multi-phase and large-scale schemes is welcome. Excessive upfront detail and rigid phasing requirements can hinder delivery, particularly for long-term complex sites.

However, allowing proposals to be resisted where they conflict with emerging plans for large-scale development raises concern. This could be interpreted broadly and used to refuse schemes on the basis of plans that are not yet adopted. Clear safeguards will be needed to ensure this provision is applied proportionately.

82) Are further definitions needed to support very large or "super strategic" sites?

Greater clarity would be beneficial.

This could include:

- clearer thresholds defining such sites;
- alignment between spatial development strategies, infrastructure planning and delivery frameworks;
- recognition that different tenures, including Build to Rent, can accelerate early phases of delivery.

Members also noted that the draft does not define "super strategic". Unit thresholds alone may be too blunt, as many strategic sites are defined more by infrastructure requirements and delivery complexity than by dwelling numbers alone.

7: Building a strong, effective economy

Chapter 7: Building a Strong, Effective Economy

84) Do you agree that more emphasis should be placed on relevant national strategies and the need for flexibility in planning for economic growth, as drafted in policy E1?

Members strongly support the intention behind the new economic policies, particularly the explicit recognition of freight, logistics and industrial uses within the framework. However, several drafting issues risk undermining the effectiveness of the chapter.

The scale of the sector's economic contribution underlines the importance of ensuring planning policy supports its growth. Industrial and logistics activity supports approximately 4.5 million jobs across the UK, with employment in logistics growing around 29% between 2010 and 2025 compared with around 17% across the wider economy. Jobs in the sector are also estimated to be around 10% more productive than the UK average, reflecting increasing automation and technological innovation.

While national strategies such as the Industrial Strategy are referenced, members noted that logistics is not given the prominence suggested by its economic importance. Given the scale and national significance of the sector, and the development of a new UK Freight Strategy, logistics should be explicitly referenced in the policy framework.

Members recommended:

- adding logistics to the list of priority sectors referenced in E1 and Footnote 33;
- ensuring the forthcoming national freight strategy is referenced within national planning policy.

Members also strongly supported the inclusion of market signals within the framework. However, market signals are currently referenced only in the context of the NDMPs. This risks creating a situation where market evidence is considered at application stage but not when employment land requirements are established through plan-making, which is equally as important (noting that market signals are referred to within the context of plan-making in the 2024 NPPF at Paragraph 32).

To ensure consistency, references to market signals should also be incorporated into plan-making policies, namely PM2, PM8 and E1, relating to:

- local plan preparation;
- spatial development strategies;
- employment land need assessments.

This is important to ensure employment land allocations reflect real market demand rather than relying solely on traditional forecasting approaches. National guidance should also recognise the role of suppressed demand, where historic supply constraints have prevented the market from meeting actual demand.

Members noted that the consultation also provides an opportunity to review employment land assessment methodologies within Planning Practice Guidance. Current approaches rely heavily on labour supply modelling, which risks significantly underestimating industrial and logistics demand.

Labour-based methods typically capture demand linked to housing growth, yet evidence suggests that less than half of industrial and logistics demand is directly related to housing growth.

Government should therefore move towards a more market-signals-led approach to employment land assessment, supported by clearer guidance that this should consider key market indicators such as:

- rental growth;
- vacancy rates
- take-up trends;
- development pipelines;
- land availability constraints.

Local planning authorities should also be encouraged to engage with businesses, developers and market agents when assessing employment land needs to ensure planning policy reflects real economic demand.

Given the above, we suggest the following amendments to select paragraphs within the PPG to ensure robust approaches to the assessment of market signals when preparing Local Plan and SDS employment evidence.

| Current PPG | Suggested Revisions |
|---|--|
| <p>Paragraph: 027 Reference ID: 2a-027-20190220</p> <p>How can market signals be used to forecast future need?</p> <p>Strategic policy making authorities will need to develop an idea of future needs based on a range of data which is current and robust, such as:</p> <ul style="list-style-type: none"> • sectoral and employment forecasts and projections which take account of likely changes in skills needed (labour demand) • demographically derived assessments of current and future local labour supply (labour supply techniques) | <p>Paragraph: 027 Reference ID: 2a-027-20190220</p> <p>How can market signals be used to assess future need?</p> <p>Local Plan making authorities should assess future employment land needs based on a range of up-to-date and robust market signals.</p> <p>Authorities should consider both demand-side and supply-side indicators to determine whether a market is currently 'supply-constrained', in 'equilibrium', or 'over-supplied'. This assessment should include, as a minimum, consideration of the following metrics:</p> <ul style="list-style-type: none"> • Average annual net absorption (ie leasing demand) compared with average annual net deliveries (i.e. change in total stock): This provides a direct comparison between realised demand |

| Current PPG | Suggested Revisions |
|---|--|
| <ul style="list-style-type: none"> analysis based on the past take-up of employment land and property and/or future property market requirements consultation with relevant organisations, studies of business trends, an understanding of innovative and changing business models, particularly those which make use of online platforms to respond to consumer demand and monitoring of business, economic and employment statistics. <p>Authorities will need to take account of longer term economic cycles in assessing this data, and consider and plan for the implications of alternative economic scenarios.</p> | <p>and new supply. Where net absorption exceeds net deliveries over the relevant monitoring period, this indicates the market is supply-constrained.</p> <ul style="list-style-type: none"> Availability rate compared with the market's equilibrium availability rate: The market's availability rate should be assessed against the level required to support the normal functioning of the market (ie the equilibrium rate). Where availability falls below this level, it indicates a supply-constrained market. Equilibrium availability is typically considers in most employment evidence to be 7.5%-8% but may change based on specific local circumstances and employment use types. Rental growth relative to inflation over an appropriate monitoring period: Sustained rental growth above inflation provides further evidence of a supply-demand imbalance and strengthening occupier competition for available space. View of local business, Chambers of Commerce and commercial agents in terms businesses ability to find suitable premises, ability to pay market rents, views on local economic conditions and access to labour. <p>Ideally the above core market signals should be reviewed annually as part of the Authority Monitor Report (AMR).</p> <p>Authorities should assess these indicators over an appropriate monitoring period that reflects longer-term economic and property market cycles, typically a minimum period of 10 years where data is available.</p> <p>Where two or more of these indicators demonstrates that a market is supply-constrained, this clearly indicates a supply constrained market where demand is likely being suppressed and unmet employment needs exist.</p> |

| Current PPG | Suggested Revisions |
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| | <p>Other supplementary market indicators can also be used to help further define the level of unmet need and any specific gaps in the market. For instance:</p> <ul style="list-style-type: none"> • Quality of existing employment premises • Commercial attractiveness of existing land supply • How much commercial floorspace an area / local authority has compared to regional and national averages • Out-commuting patterns |
| <p>Paragraph: 028 Reference ID: 2a-028-20190220</p> <p>How can strategic policy making authorities identify the existing stock of employment land and identify the recent pattern of supply and loss?</p> <p>A simple typology of employment land by market segment and by sub-areas, where there are distinct property market areas within authorities, can be developed and analysed. This can be supplemented by information on permissions for other uses that have been granted, if available, on sites formerly in employment use.</p> | <p>Paragraph: 028 Reference ID: 2a-028-20190220</p> <p>How can strategic policy making authorities identify the existing stock of employment land and identify the recent pattern of supply and loss?</p> <p>The supply of available employment land should be collated by employment use class.</p> <p>Available land is made up:</p> <ul style="list-style-type: none"> • Existing commercial premises that are available to the market for lease / sale • Existing planning permissions that are not yet built out and occupied • Employment sites under construction • Existing allocations / draft allocations that are still available <p>The above will provide a quantitative level of available supply that can be supplemented with qualitative information such as age and quality of existing commercial premises, number of small versus larger strategic sites, and gaps in the market via discussions with local businesses and commercial agents.</p> |

| Current PPG | Suggested Revisions |
|---|---|
| <p>Paragraph: 029 Reference ID: 2a-02920190220</p> <p>How can current market demand be analysed?</p> <p>The available stock of land can be compared with the particular requirements of the area so that 'gaps' and any over-supply in local employment land provision can be identified.</p> <p>It is important to consider recent employment land take-up and projections (based on past trends) and forecasts (based on future scenarios), and to identify instances where sites have been developed or sought for specialist economic uses. This will help to provide an understanding of the underlying requirements for office, general business and distribution space, and (when compared with the overall stock of employment sites) can form the context for appraising individual sites.</p> <p>Analysing supply and demand will allow policy makers to identify whether there is a mismatch between quantitative and qualitative supply of and demand for employment sites. This will enable an understanding of which market segments are over-supplied to be derived and those which are undersupplied.</p> | <p>Paragraph: 029 Reference ID: 2a-02920190220</p> <p>How can future market demand be estimated?</p> <p>The starting point for estimating future demand for different commercial uses should be the forward projection of the historic net absorption trend (in floorspace terms). Net absorption is a measure of leasing demand in terms of tenants moving in versus moving out of space. The historic monitoring period should typically cover at least 10 years, where data is available, in order to reflect a full economic and property market cycle.</p> <p>Authorities should then apply appropriate adjustments to ensure that forecasts reflect underlying market conditions and future growth potential; including:</p> <ul style="list-style-type: none"> • An adjustment to account for historic suppressed or unmet demand, where evidence indicates that past activity has been constrained by limited land or premises availability rather than a lack of occupier demand – <i>see Paragraph: 027 Reference regarding market signals.</i> • Consideration of market information from key market participants whether they be Government or private companies as well as any relevant macroeconomic data on market conditions. • Consideration of specific locational requirements and market relationships, including the role of the area within wider Functional Economic Market Areas and the extent to which demand and supply dynamics operate across local authority and SDS boundaries. <p>This approach will enable authorities to develop a robust understanding of the scale, type, and location of employment space required, including office, general industrial, storage and distribution uses and data centres.</p> <p>Where possible an assessment should be made of more localised demand versus more strategic demand typically</p> |

| Current PPG | Suggested Revisions |
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| | <p>for large scale commercial developments which cater for more of a FEMA wide demand profile. This strategic demand will typically require cross border discussion and joint working between local authorities / SDSs. It should be noted that larger sites will need to be allocated to accommodate more strategic development which accommodate a wider FEMA wide demand profile. Strategic scale sites are typically in the magnitude of 25ha-50ha or greater.</p> <p>When considered alongside the existing stock and pipeline of employment land and premises, it will enable authorities to assess whether sufficient land is available in appropriate locations and of a suitable quality to meet future needs, and to plan accordingly.</p> |
| <p>Paragraph: 030 Reference ID: 2a-030-20190220</p> <p>How can employment land requirements be derived?</p> <p>When translating employment and output forecasts into land requirements, there are 4 key relationships which need to be quantified. This information can be used to inform the assessment of land requirements:</p> <ul style="list-style-type: none"> • Standard Industrial Classification sectors to use classes • Standard Industrial Classification sectors to type of property • employment to floorspace (employment density) and • floorspace to site area (plot ratios based on industry proxies) | <p>Paragraph: 030 Reference ID: 2a-030-20190220</p> <p>How can future employment land need be derived?</p> <p>In simple terms, future employment need is derived from comparing future market demand (paragraph 27 and 29) with current available supply (paragraph 28). When future market demand is higher than current supply more land is required and vice versa.</p> <p>As part of this process estimates for floorspace need will need to be translated to a land requirement via appropriate plot ratios, having regard to relevant industry standards.</p> <p>Authorities should support the assumptions used with appropriate evidence, including site-specific examples and market comparables where available, to ensure that land need estimates are realistic and robust.</p> <p>For instance large scale distribution will typically have lower plot ratios than urban logistics or last mile logistics. Similarly town centre offices will typically have higher plot ratios than edge of centre business parks.</p> <p>Local Planning Authorities' should also monitor, as part of the AMRs, if they have a 5 year employment land supply.</p> |

| Current PPG | Suggested Revisions |
|---|--|
| <p>Paragraph: 031 Reference ID: 2a-031-20190722</p> <p>How can authorities assess need and allocate space for logistics?</p> <p>The logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, and has distinct locational requirements that need to be considered in formulating planning policies (separately from those relating to general industrial land).</p> <p>Strategic facilities serving national or regional markets are likely to require significant amounts of land, good access to strategic transport networks, sufficient power capacity and access to appropriately skilled local labour. Where a need for such facilities may exist, strategic policy-making authorities should collaborate with other authorities, infrastructure providers and other interests to identify the scale of need across the relevant market areas. This can be informed by:</p> <ul style="list-style-type: none"> • engagement with logistics developers and occupiers to understand the changing nature of requirements in terms of the type, size and location of facilities, including the impact of new and emerging technologies; • analysis of market signals, including trends in take up and the availability of logistics land and floorspace across the relevant market geographies; • analysis of economic forecasts to identify potential changes in demand and anticipated growth in sectors likely to occupy logistics facilities, or which require support from the sector; and • engagement with Local Enterprise Partnerships and review of their plans and strategies, including economic priorities within Local Industrial Strategies. | <p>Paragraph: 031 Reference ID: 2a-031-20190722</p> <p><i>No Change, except explicit reference to net absorption when analysis of market signals is referenced, as opposed to take up.</i></p> |

| Current PPG | Suggested Revisions |
|---|--|
| <p>Strategic policy-making authorities will then need to consider the most appropriate locations for meeting these identified needs (whether through the expansion of existing sites or development of new ones).</p> <p>Authorities will also need to assess the extent to which land and policy support is required for other forms of logistics requirements, including the needs of SMEs and of 'last mile' facilities serving local markets. A range of up-to-date evidence may have to be considered in establishing the appropriate amount, type and location of provision, including market signals, anticipated changes in the local population and the housing stock as well as the local business base and infrastructure availability.</p> | |
| <p>Paragraph: 032 Reference ID: 2a-032-20190722</p> <p>How can the specific locational requirements of specialist or new sectors be addressed?</p> <p>When assessing what land and policy support may be needed for different employment uses, it will be important to understand whether there are specific requirements in the local market which affect the types of land or premises needed. Clustering of certain industries (such as some high tech, engineering, digital, creative and logistics activities) can play an important role in supporting collaboration, innovation, productivity, and sustainability, as well as in driving the economic prospects of the areas in which they locate. Strategic policy-making authorities will need to develop a clear understanding of such needs and how they might be addressed taking account of relevant evidence and policy within Local Industrial Strategies. For example, this might include the need for greater studio capacity, co-working spaces or research facilities.</p> <p>These needs are often more qualitative in nature and will have to be informed by engagement with businesses and occupiers within relevant sectors.</p> | <p>Paragraph: 032 Reference ID: 2a-032-20190722</p> <p><i>No Change.</i></p> |

85) Do you agree with the approach to meeting the need for business land and premises in policy E2?

Members welcomed the broad approach taken in E2 but identified several areas where the policy would benefit from clarification.

Where unmet need is relevant, E2 should cross reference policies relating to Grey Belt as well as development outside settlements, as both require need to be demonstrated.

Members also noted that while E2 refers to "specific locational requirements", it does not sufficiently acknowledge the physical requirements of modern industrial and logistics development.

Sites may be located close to the appropriate transport networks but still be unsuitable due to physical constraints such as:

- insufficient plot sizes
- inadequate yard depths;
- height restrictions;
- suboptimal plot ratios.

Recognising these physical requirements is important to ensure the planning system allocates sites capable of accommodating modern employment development.

Members also highlighted that some of these considerations are referenced in decision-making policies but not consistently reflected in the plan-making elements of the framework, creating potential internal inconsistencies.

86) Do you agree with the proposed new decision-making policy supporting freight and logistics development in policy E3?

Members strongly welcomed the inclusion of a specific decision-making policy recognising freight and logistics development.

However, several drafting issues were identified that could undermine the effectiveness of the policy.

A central concern relates to the interaction between E3 and transport policies elsewhere in the framework. Logistics development typically relies on proximity to strategic road and rail infrastructure, such as motorway junctions, rail freight interchanges and key logistics corridors.

For logistics development, the dominant movements are heavy goods vehicles rather than commuter travel. Operational efficiency and supply chain functionality therefore require different locational considerations from residential or office uses.

Many logistics operations also run on a 24-hour basis and require separation from residential areas to avoid unacceptable amenity impacts.

Industrial and logistics development also supports wider economic sectors. Evidence indicates that around 22% of inputs purchased by key UK growth sectors rely on industrial and logistics activity, illustrating the sector's role in enabling the wider industrial strategy and supporting supply chains across the economy.

Without clearer cross referencing between policies, there is a risk that authorities interpret logistics through a housing-led understanding of sustainable transport and active travel, potentially leading to refusals for schemes in locations that are operationally optimal.

Members therefore recommended clarifying that, for certain employment uses including industrial, storage and distribution, proximity to strategic transport infrastructure may outweigh proximity to settlements.

Members also raised concerns regarding the application of active travel requirements. While these provisions are intended to be applied flexibly, this is not sufficiently reflected in the current drafting. There is a risk that authorities may interpret them as implying logistics development should be located close to settlements, which is often incompatible with operational requirements and maximising productivity/efficiency.

The framework should therefore clarify that active travel expectations should be applied where appropriate to the nature of the use with the 'where possible' in E3(1)(a) being supplemented by a change to TR3 that specifically refers to industrial and logistics as an example of a use where its nature makes active travel impractical in some contexts given its unique locational requirements. It should be recognised that impacts upon peak hours is largely mitigated by shift changes occurring outside of these hours and the scheduling of deliveries throughout the day.

Members also identified ambiguity in the wording of policy E3B, particularly the reference to "co-location or intensification".

In some policy contexts, particularly in London, co-location refers to the mixing of industrial and residential uses. This does not appear to be the intention of the policy and risks misinterpretation.

Members suggested replacing this wording with clearer terminology referring to clustering of logistics uses and supporting infrastructure. This would better reflect how the sector operates and recognise the importance of:

- achieving a critical mass of logistics activity;
- locating near strategic transport infrastructure;
- supporting shared services and workforce accessibility.

Finally, members raised concerns regarding references to "sensitive building design". While good design is important, industrial and logistics buildings have specific operational requirements, including height, span and yard space, which limit the extent to which certain design changes are feasible.

Policy wording should therefore recognise these operational requirements to avoid unrealistic expectations of what are functional and adaptable buildings.

87) Do you agree with the approach to rural business development in policy E4?

Members did not raise significant concerns regarding the overall intent of policy E4. However, they emphasised the importance of ensuring that rural business policy remains supportive of employment development that may have specific locational requirements.

Members also noted that consistent terminology should be used throughout the chapter. The draft frequently refers to “freight and logistics”, whereas the sector is more accurately described as “industrial and logistics”.

This distinction is important because many logistics parks incorporate significant proportions of industrial uses such as advanced manufacturing, light industrial and other B2 uses.

Using a narrower freight and logistics definition risks unintentionally excluding or disadvantaging these related employment activities. Members therefore recommended adopting consistent terminology across the framework that reflects the broader industrial and logistics sector.

8: Ensuring the vitality of town centres

88) Do you agree with the proposed changes to policy for planning for town centres?

Members were broadly supportive of the updated approach to town centres and retail, particularly the retention of the town centre first principle and the emphasis on diversification, bringing vacant units back into use and supporting regeneration. These objectives are important in responding to the changing role of town centres and the evolution of retail and commercial activity.

However, members noted that the drafting contains several inconsistencies and potential mixed messages that could introduce additional complexity into the system. In particular, the removal of the requirement for local authorities to plan for at least ten years of need for main town centre uses, replacing it with a requirement to plan for the full plan period, represents a significant shift. While this may be appropriate given rapidly changing retail patterns, it increases the importance of authorities relying on robust and up-to-date evidence when assessing need and deliverability.

Members also expressed mixed views regarding the removal of Primary Shopping Areas (PSAs). Some considered this a logical response to the introduction of Use Class E and the increasingly mixed nature of

town centre uses. Planning policy may therefore be more effective when applied to the centre as a whole rather than focusing on tightly defined retail frontages.

However, other members raised concerns that removing PSAs may have unintended consequences. Without this distinction, the town centre boundary effectively becomes the reference point for policy tests, potentially widening the area applicants must consider for sequential assessments. This could make the process more complex rather than simplifying it.

Members also noted that expanding edge-of-centre distances to 300 metres may further complicate the application of both sequential and impact assessments.

Overall, while the updated policy direction is broadly welcomed, careful drafting will be required to ensure changes intended to modernise town centre policy do not inadvertently create additional procedural burdens.

89) Do you agree with the approach to development in town centres in policy TC2?

a) If not, please explain how you would achieve this aim differently?

Members broadly support the objective of strengthening town centre vitality and viability through policies encouraging diversification and intensification of uses.

However, some members noted that the policy may represent a missed opportunity not to recognise residential development explicitly as a main town centre use. Residential development can play an important role in supporting regeneration by increasing footfall, supporting local services and encouraging more active town centre environments.

Concerns were also raised that the removal of Primary Shopping Areas, combined with the erosion of frontage distinctions and the expansion of edge-of-centre radii, could introduce additional uncertainty in decision-making. This may make it harder for applicants and authorities to determine how policy should be applied in practice.

90) What impacts, if any, have you observed on the operation of planning policy for town centres since the introduction of Use class E?

Members agreed that the introduction of Use Class E has had significant impacts on the operation of planning policy for town centres.

Use Class E has introduced greater flexibility within centres and supported the reoccupation of vacant premises by allowing a broader range of uses to operate within the same planning category. This flexibility has played an important role in supporting town centre adaptation.

However, it has also created tensions with existing planning policy tools. In particular, Use Class E enables retail and other town centre uses to operate in out-of-centre locations without planning permission,

bypassing both the sequential and impact tests that were originally designed to support the town centre first principle.

As a result, the planning system is now attempting to regulate patterns of development that the wider use class framework has partially deregulated. This has reduced the practical influence of some long-established policy tools and highlights the need for town centre policy to evolve alongside the Use Class system.

91) Do you believe the sequential test in policy TC3 should be retained?

Members considered the sequential test to remain an important element of town centre planning policy. However, there were strong concerns about how it operates in the context of the modern commercial environment and the introduction of Use Class E.

Several members noted that the consultation appears to send mixed signals regarding the future of the sequential test. On the one hand, the consultation questions whether the test should remain in a Use Class E environment. On the other hand, other proposed changes – such as removing Primary Shopping Areas and widening town centre boundaries – may make the sequential exercise more complex rather than simplifying it.

Members also expressed strong concern about proposals that could effectively reintroduce disaggregation by requiring applicants to assess whether proposals could be delivered across multiple sites. This approach risks moving the test away from assessing whether a proposal can be accommodated in the real world and instead encourages consideration of hypothetical schemes that do not reflect commercial realities.

In practice, retailers and leisure operators select locations based on a range of operational and commercial factors, including catchment, visibility, access, servicing arrangements and the format requirements of the business. Simply identifying an available unit within a centre does not necessarily mean it represents a viable alternative location.

Members therefore emphasised that any retained sequential approach must operate in a way that reflects commercial reality and focuses on genuinely suitable sites rather than theoretical alternatives.

92) Do you agree with the approach to town centre impact assessments in policy TC4?

Members supported the retention of the national impact test threshold and recognised its importance in providing consistency and predictability for applicants and authorities.

Impact assessments remain an important mechanism for assessing the potential effects of development on town centre vitality, investment and planned growth. Unlike the sequential test, which focuses on theoretical alternative locations, impact assessments provide a more evidence-based approach that considers how development may affect existing centres and planned investment.

Where local authorities choose to introduce locally set thresholds, these should be supported by robust local evidence and kept under regular review to ensure they remain proportionate and appropriate.

12: Making effective use of land

14) Do you agree policy L1 provides clear guidance on how Local Plans should be prepared to promote the efficient use of land?

Members broadly support the objective of making more efficient use of land, particularly within existing settlements and around public transport infrastructure.

However, policies promoting efficient land use must retain sufficient flexibility to reflect differences in local market conditions, settlement patterns, infrastructure capacity and design context. A one-size-fits-all approach risks undermining deliverability in areas where development viability, demand or infrastructure capacity may differ significantly.

115) If not, what further guidance is needed?

No additional detailed guidance was identified beyond ensuring that national policy maintains flexibility to reflect differing local market conditions, settlement characteristics and infrastructure constraints.

116) Do you agree policy L2 provides clear guidance on how development proposals should be assessed to ensure efficient use of land?

Members generally support the ambition of promoting more efficient land use and making effective use of land within settlements.

However, consistent with the comments above, the policy will need to be applied with sufficient flexibility to reflect local market conditions, design considerations and infrastructure capacity to ensure development remains deliverable.

117) Do you agree policy L2 identifies appropriate typologies of development to support intensification?

Members broadly support the objective of encouraging appropriate forms of intensification. However, higher-density typologies that may be suitable in major urban centres may not always be viable or deliverable in smaller towns or suburban-edge locations. Policy should therefore recognise differences between markets and settlement types.

118) Do you agree the high-level design principles provided in policy L2(d) appropriate for national policy?

High-level design principles are appropriate at national level. However, these should be framed in a way that allows sufficient flexibility for local context, infrastructure capacity and market conditions to be considered when determining appropriate forms of development.

119) Do you agree policy L2(d)(i) achieves its intent to enable appropriate development that may differ from the existing street scene, particularly in cases such as corner plot redevelopment and upwards extensions?

Members welcome the clarification that existing character should not automatically prevent appropriate intensification.

Previous interpretations of national policy have sometimes allowed “character” arguments to be used to resist sensible densification. The updated wording therefore represents a positive step in recognising that urban areas evolve over time. However, design considerations and local context should continue to be considered alongside opportunities for intensification to ensure development remains appropriate to its surroundings.

121) Do you agree policy L3 provides clear guidance on achieving appropriate densities for residential and mixed-use schemes?

Members broadly support the principle that development within settlements should make effective use of land and contribute to increasing density where appropriate. However, as noted above, density expectations should remain flexible and responsive to local context, infrastructure capacity and market conditions.

122) Do you agree with the minimum density requirements set out within policy L3?

Members raised significant concerns about the practicality of national minimum density requirements in many parts of the country.

In lower-value markets and smaller towns, minimum density expectations may not always align with market demand or viability. Members noted that in some areas housing above three or four storeys may not be commercially viable, and developers will not deliver housing products that the market cannot absorb. While the ambition to increase density is understood, a blanket national approach risks forcing inappropriate development typologies and could inadvertently undermine delivery in areas where the government is seeking to support growth.

Policy should therefore retain flexibility to reflect differing market conditions and local contexts.

124) Do you agree with the proposed definition of a ‘well-connected’ station used to help set higher minimum density standards in targeted growth locations?

Members support the objective of promoting higher density development around transport infrastructure. However, concerns were raised about the criteria used to define “well-connected” stations.

The current drafting appears to rely on thresholds such as the presence of four train services per hour. Members noted that this may reflect a London-centric interpretation of accessibility.

Members also noted that the current drafting risks excluding stations that in practice provide strong levels of connectivity to services and employment. Around many major conurbations, stations operate with service patterns that exceed four trains per hour during peak periods, when the majority of people travel, but fall below this threshold during the middle of the day when demand is lower. These service patterns can still provide highly effective and sustainable transport connections and support the objectives of the policy. As currently drafted, the definition may therefore unintentionally exclude a number of appropriate locations for sustainable growth.

In many parts of the country, stations with two or three services per hour may still provide strong connectivity and represent appropriate locations for sustainable development. Applying rigid national thresholds risks excluding a large number of stations that could support growth. A more flexible approach that reflects regional transport patterns and peak-time service levels may therefore be more appropriate.

Members also noted that the policy currently focuses heavily on rail stations and does not clearly recognise other important transport nodes such as bus interchanges or tram networks, which can play an equally important role in supporting sustainable development.

125) Are there other types of location where minimum density standards should be set nationally?

Members noted that other transport nodes - such as major bus interchanges, tram stops or light rail networks - may also represent appropriate locations for higher-density development. However, any national policy in this area should be applied flexibly and reflect differences in regional transport systems and settlement patterns.

126) Should we define a specific range of residential densities for land around stations classified as 'well-connected'?

Members cautioned against rigid national density requirements around transport hubs. While intensification around well-connected locations is supported in principle, national density thresholds may not reflect local market conditions, site constraints or infrastructure capacity. A more flexible guidance-based approach may be more effective.

127) If so, what should that range be, and which locations should it apply to?

Members did not propose a specific national density range. Instead, they emphasised that density expectations should reflect local context, market demand and infrastructure capacity.

13: Protecting Green Belt land

132) Do you agree policy GB2 gives sufficient detail on the expected roles spatial development strategies and local plans play in assessing Green belt land?

Members broadly support the principle that Spatial Development Strategies (SDSs) should play a stronger role in considering strategic Green Belt change. Given the cross-boundary nature of many housing and infrastructure needs, a strategic approach can provide a more coherent framework for assessing where Green Belt boundaries may need to evolve.

However, this also reinforces the importance of ensuring SDSs are implemented consistently across the country. In areas where SDSs are not yet established, uncertainty may arise regarding how strategic Green Belt decisions should be approached.

133) Do you agree with proposals to better enable development opportunities around suitable stations to be brought forward?

Members support the principle of enabling development opportunities around well-connected transport nodes, including railway stations, where this can support sustainable patterns of growth.

However, further clarity will be needed regarding how station-related opportunities operate in practice within the wider policy framework, particularly where Green Belt land is involved. This includes ensuring clear guidance on how catchments and walking distances are defined and how these provisions interact with other policies within the Framework.

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

No specific comments were raised on this policy.

136) Do you agree policies GB6 and GB7 set out appropriate tests for considering development on Green Belt land?

Members broadly welcome the clearer and more structured approach taken to Green Belt policy in the draft Framework, particularly the introduction of more explicit tests relating to Grey Belt land. The formalisation of Grey Belt within national policy is seen as a significant and positive step. Members particularly welcomed the clearer definition of Grey Belt as land within the Green Belt that makes a limited contribution to Green Belt purposes.

Requiring authorities to assess Grey Belt through the plan-making process should provide greater transparency and certainty compared with the current system, where such arguments often arise only during appeal or examination.

However, members noted that clear and consistent guidance will be essential to ensure authorities apply Grey Belt assessments in a consistent manner. Without this, there is a risk that different methodologies could emerge across authorities, potentially leading to inconsistent outcomes at examination and appeal.

137) Do you agree policy GB7(1h) successfully targets appropriate development types and locations in the Green Belt, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12?

Members generally recognise the intention behind targeting development opportunities in the Green Belt where the proposed "Golden Rules" are met.

However, some members noted that further clarity may be required regarding how these provisions operate alongside other parts of the Framework, particularly policies relating to development outside settlements and transport-led growth.

As currently drafted, the relationship between the Grey Belt test in GB7 and other policy routes - such as those relating to development outside settlements - is not entirely clear. Greater clarity on the sequencing of these policies would help ensure the framework operates more intuitively in practice.

139) Do you agree that site-specific viability assessment should be permitted on development proposals subject to the Golden Rules in these three circumstances?

Members recognised the rationale for allowing site-specific viability assessments in certain circumstances. However, clear guidance will be needed to ensure such assessments are applied consistently and transparently, particularly where they interact with the Golden Rules framework.

140) With regards to previously developed land, are there further changes to policy or guidance that could be made to help ensure site-specific viability assessments are used only for genuinely previously developed land, and not predominantly greenfield sites?

No specific comments were raised on this issue.

141) Do you agree with setting an affordable housing 'floor' for schemes subject to the Golden Rules accompanied by a viability assessment subject to the terms set out?

Members did not raise detailed comments on the specific mechanism proposed. However, as with other policies relating to viability and affordable housing delivery, it will be important that any nationally set requirements remain deliverable across a range of market conditions.

142) Please explain your answer, including your view on the appropriate approach to setting a 'floor', and the right level for this?

No specific comments.

143) Do you agree with local planning authorities testing viability at the plan-making stage using a standardised Benchmark Land Values scenario of 10 times Existing Use Value for greenfield, Green Belt land?

No specific comments were raised on this proposal.

144) Do you have any other comments on the use of nationally standardised Benchmark Land Values for local planning authorities to test viability at the plan-making stage?

No specific comments.

145) Do you agree that proposed changes to the grey belt definition will improve the operability of the grey belt definition, without undermining the general protections given to other footnote 7 areas?

Members broadly support the proposed changes to the Grey Belt definition and welcome the move to embed Grey Belt more clearly within national planning policy.

Members consider that providing a clearer and more binary definition should reduce the scope for ongoing debate about whether land qualifies as Grey Belt. Requiring authorities to identify and assess Grey Belt through the plan-making process should also provide greater transparency and certainty for applicants, communities and decision-makers.

However, clear guidance will still be important to ensure consistent interpretation across authorities. Without this, differing methodologies could emerge, potentially undermining the intended benefits of the policy.

14: Achieving well-designed places

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

Members support the importance placed on achieving high quality design and placemaking. However, there is concern that the current drafting may introduce a level of subjectivity that could create uncertainty in decision making.

Design quality is inherently capable of different interpretations. Without clearer guidance on how design quality should be assessed, there is a risk that design policies could become a mechanism through which otherwise sustainable development is refused on subjective grounds.

National policy should therefore ensure that design expectations are clear, proportionate and consistently applied, reducing the risk of inconsistent interpretation across different authorities.

147) Do you agree with the approach to design tools set out in policy DP2?

Members support the use of design tools where they help improve the quality and clarity of development proposals. However, the application of such tools should remain proportionate and should not introduce unnecessary procedural burdens that could delay delivery.

148) Do you agree policy DP3 clearly set out principles for development proposals to respond to their context and create well-designed places?

Members recognise the importance of ensuring development responds appropriately to its context and contributes to well-designed places. However, it will be important that the policy is applied in a way that allows for evolution and positive change within settlements.

Design policies should not be interpreted in a way that prevents appropriate intensification or the delivery of new forms of development where these respond to wider policy objectives such as housing delivery and efficient use of land.

149) Do you agree with the proposed approach to using design review and other design processes in policy DP4?

We support greater use of design review where it is proportionate and adds value, particularly for large or complex schemes where early scrutiny can improve outcomes. Design review panels can be helpful in raising quality and strengthening placemaking.

However, design review should not become a blanket requirement for all developments. The process must remain proportionate to the scale and nature of the proposal, avoiding unnecessary delay or duplication where schemes are small, straightforward, or within established development parameters.

Flexibility is important to ensure that design review is used where it genuinely improves outcomes, rather than creating an additional procedural hurdle.

Chapter 18: Managing Flood Risk and Coastal Change

171) Do you agree with the proposed changes set out in policy F3 to improve how Coastal Change Management Areas are identified and taken into account in development plans?

172) Do you agree with the proposed clarifications to the sequential test set out in policy F5?

173) Do you agree with the proposed approach to the exception test set out in policy F6?

174) Do you agree with the proposed requirement in policy F8 for sustainable drainage systems to be designed in accordance with the National Standards?

175) Do you agree with the proposed new policy to avoid the enclosure of watercourses, and encourage the de-culverting and re-naturalisation of river channels?

176) Do you agree with the proposed changes to policy for managing development in areas affected by coastal change?

177) The National Coastal Erosion Risk Map sets out where areas may be vulnerable to coastal change based on different scenarios. Do you have views on how these scenarios should be applied to ensure a proportionate approach in applying this policy?

178) Do you agree with the proposed new additions to Table 2: Flood Risk Vulnerability Classifications? Should any other forms of development should be added?

We have not responded to the individual questions in this section, but support the inclusion of a dedicate chapter on managing flood risk. We think this is helpful.

We would, however, note that one of the biggest challenges reported by our members in relation to the planning system and managing flood risk and drainage is the under-resourcing of Lead Local Flood Authorities (LLFAs) which can result in long delays in securing decisions, which adds cost and delays schemes.

We have also heard similar concerns about other statutory consultees, such as the Environment Agency, where long delays in securing approval have created significant time and cost pressures that impact the viability of individual projects.

The proposed reforms to the NPPF do not appear to address these fundamental challenges.

Chapter 19: Conserving and enhancing the natural environment

179) Do you agree that the proposed approach to planning for the natural environment in policy N1, including the proposed approach to biodiversity net gain, strikes the right balance between consistency, viability, deliverability, and supporting nature recovery?

180) In what circumstances would it be reasonable to seek more than 10% biodiversity net gain on sites being allocated in the development plan, especially where this could support meeting biodiversity net gain obligations on other neighbouring sites in a particular area?

We agree that biodiversity net gain (BNG) makes an important contribution to nature recovery and are supportive of the proposed reforms outlined in the consultation paper to encourage consistency and proportionality whilst allowing some flexibility and ambition.

We would note, however, that local authorities seeking more than 10% BNG on sites is not a concern that BPF members often cite. The key challenges that members routinely share include:

- challenges in finding sufficient ecologists and environmental consultancies, given the increased demand;
- capability and capacity challenges in local planning authorities. BNG places another burden on an already over-stretched system, and there can be huge variation when it comes to in-house ecology capacity; and
- market challenges, and difficulties in accessing off-site provision and BNG units.

To help address these concerns, it will be important that there is stability and certainty in BNG policy and regulation going forward. This will give developers confidence and help grow the pool of skilled ecologists, build the market for biodiversity units and allow time for local authorities to upskill their teams.

181) Do you agree policy N2 sets sufficiently clear expectations for how development proposals should consider and enhance the existing natural characteristics of sites proposed for development?

182) Do you agree the policy in Policy N4 provides a sufficiently clear basis for considering development proposals affecting protected landscapes and reflecting the statutory duties which apply to them?

183) Do you agree policy N6 provides clarity on the treatment of internationally, nationally and locally recognised site within the planning system?

We have not responded to these questions.

184) Are there any further issues for planning policy that we need to consider as we take forward the implementation of Environmental Delivery Plans?

We support reforms that speed up the development process but that still protect and restore nature, and we want to work constructively with Government on the development of Environmental Delivery Plans (EDPs) and on the Nature Restoration Fund.

It will be important that Natural England have the capacity and capability to deliver the reforms. If the new approach simply adds delay and complexity developers will not use it.

It will also be important that the levy is set at a level that is reasonable and supports development viability.

The messaging around EDPs and the new Fund has been poor, with the result that there is some opposition and concern about whether the new approach will really benefit nature and the environment. For BPF members, it will be important that EDPs can demonstrably deliver good environmental outcomes.

Annex B: Viability - Standardised inputs in viability assessment

200) Would you support the use of growth testing for strategic, multi-phase schemes?

We do not support mandating growth testing as a standardised input within viability appraisal. Forecasting house price growth or build cost changes with sufficient confidence to embed into appraisal assumptions is inherently uncertain and can produce unrealistic results.

Where growth assumptions are considered, they should be used as optional sensitivity analysis rather than as a required policy input.

201) Would you support the optional use of growth testing for regeneration schemes?

Growth testing may be appropriate as an optional analytical tool where it assists in understanding the potential sensitivity of regeneration schemes to future market conditions. However, it should not be embedded as a mandatory input within policy, given the inherent uncertainty in forecasting long-term market movements.

202) Do you agree greater specificity, including single figures, which local planning authorities could choose to diverge from where there is evidence for doing so, would improve speed and certainty?

While the intention to improve clarity and consistency is supported, embedding detailed appraisal inputs directly within policy risks excessive rigidity.

Plan-wide viability assessments are often simplified exercises that cannot fully reflect the complexity of individual sites. Introducing fixed figures within policy could result in assumptions becoming quickly outdated or inappropriate for certain development types, potentially undermining the flexibility required to support delivery.

202a) Please explain your answer. If you agree, the government welcomes views on the appropriate figure – for example, whether 17.5% would be an appropriate reflection of the industry standard for most market for sale housing.

No specific comments on the proposed figure.

203) Are there any site types, tenures, or development models to which alternative, lower figures to 15-20% of Gross Development Value might reasonably apply?

The use of profit as a percentage of Gross Development Value may be suitable for simpler, single-phase development schemes. However, for more complex development models alternative approaches may be more appropriate.

Strategic sites, multi-phase development and infrastructure-heavy schemes often require assessment using cash flow-based measures such as internal rates of return (IRR), reflecting the scale of upfront investment and the long delivery horizons associated with such projects.

203a) Please explain your answer. The government is particularly interested in views on whether clarifying an appropriate profit of 6% on Gross Development Value for affordable housing tenures would make viability assessments more transparent and speed up decision-making.

Policy should avoid attempting to set fixed acceptable return thresholds across development types. Required returns reflect project risk, delivery structures and market conditions and cannot be meaningfully standardised across all contexts.

204) Are there further ways the government can bring greater specificity and certainty over profit expectations across landowners, site promoters and developers such that the system provides for the level of profit necessary for development to proceed, reducing the need for subjective expectations?

Members support the objective of improving transparency and consistency in viability appraisal. However, moving detailed viability assumptions into policy may embed rigid inputs that quickly become outdated. National policy should instead ensure that viability frameworks remain sufficiently flexible to reflect different development models and market conditions.

205) Existing Viability Planning Practice Guidance refers to developer return in terms a percentage of gross development value. In what ways might the continued use of gross development value be usefully standardised?

No specific comments.

206) Do you agree there circumstances in which metrics other than profit on gross development value would support more or faster housing delivery, or help to maximise compliance with plan policy?

Yes. Alternative metrics may be more appropriate for certain forms of development, particularly where projects involve long delivery horizons, complex infrastructure requirements or phased build-out. In these circumstances, measures such as internal rates of return and cash-flow-based analysis can better reflect the financial characteristics and risks associated with development.

207) Are there types of development on which metrics other than profit on gross development value should be routinely accepted as a measure of return e.g. strategic sites large multi-phased schemes, or build to rent schemes?

Yes. Strategic, phased and infrastructure-intensive schemes, as well as certain living sector models, may be better assessed using alternative financial metrics rather than a simple percentage of Gross Development Value.

Policy should therefore explicitly support the use of alternative metrics where justified by the characteristics of the development.

211) What further steps should the government take to ensure non-policy compliant schemes are not used to inform the determination of benchmark land values in the viability assessments that underpin plan-making?

Policy should avoid approaches that undermine the incentives for land to come forward for development. If benchmark land value methodologies are applied in ways that compress values below levels acceptable to landowners, land supply may tighten, undermining delivery objectives.

Ensuring that benchmark land value approaches properly reflect realistic land supply incentives will therefore be important.