

Our Response to the NPPF

Following the publication of the new National Planning Policy Framework, **Ben Rosedale**, our Director & Head of Consultancy has responded with four articles, focusing on its overall intentions, Density & Design, the Natural Environment and Heritage. The key areas within the framework which impact our areas of expertise.

Response #1: Settlement-focussed logic

The 2026 National Planning Policy Framework has arrived. Our first reaction? A focus on simplifying and centralising the planning system – with the potential to reduce local discretion and increase developer confidence. In particular, the NPPF appears to make real progress towards a spatial strategy centred on existing settlements, transport accessibility and infrastructure-led growth; a positive evolution of the changes to green belt policy from 2024.

For EDP, it appears that successful development will continue to depend on bringing creative, timely and cost-effective inputs to scheme design at the earliest stage, ensuring that opportunities for the future beneficiaries of development (including residents and the environment) are considered alongside current perspectives and constraints.

Published on 17 August 2026, the new NPPF is a comprehensive rewrite of the now established planning framework for England. It introduces 131 coded policies, separates policies for plan-making from national policies for decision-making, and establishes a more directive framework for determining development proposals.

Much attention will understandably focus on the national decision-making policies (“NDMPs”) (and what they mean for existing local policies), opportunities for development around well-connected stations, and the new “tilted balances” (especially policies S4 and S5).

Underlying the headlines, important messages run throughout the Framework: key landscape, arboricultural, ecological and heritage designations retain significant weight in determinations – whilst non-designated assets should be weighed in tandem with other technical issues. The best consultants will need to be able to look beyond their individual subject areas and advise on the relative importance of each material consideration to ensure that clients get the right balance of benefits and costs in presenting schemes for determination (and if necessary, arguing these at inquiry).

For EDP, this reinforces an approach we have advocated throughout our 20-year history. Consideration of landscape, natural capital, heritage and placemaking should be underpinned by robust assessment, professional knowledge and judgement, and clear communication – helping shape development from the outset.

Response #2: Density and Design

In our second article on the topic, we consider NPPF ambitions for density and how this might affect considerations of good design.

Density... The policy balance has shifted firmly towards intensification. Policy L2 gives substantial weight to reusing vacant, underused and previously developed land, whilst L3 expects residential and mixed-use development within settlements to increase local density unless clearly justified otherwise. Existing character must be considered but should not prevent development making the most of an area’s potential.

... Specified Addressing the significant policy focus for areas in proximity to well-connected railway stations, minimum densities of 35 dwellings per hectare apply, rising to 45dph+ where rail services are particularly frequent. In this regard, the NPPF uses one of its trump cards: development that does not make efficient use of land at the prescribed levels should be refused. **Existing Character vs Delivery** - “Respecting character” can therefore no longer routinely mean

reproducing the prevailing density. The design task is to demonstrate how additional development can be accommodated while responding intelligently to context.

Design Principles Policy DP3 provides a counterweight. It identifies i) context and ii) seven principles for well-designed places: liveability, climate, nature, movement, built form, public space and identity. We can expect this policy, and the language it employs for discussions regarding design, to be critical in justifying proposals – especially where higher densities are expected.

The Challenge Recent appeal decisions confirm that Inspectors are very willing to turn down otherwise compliant schemes where adverse design outcomes are not resolved. The new NPPF increases the pressure: designers must contend with the reality that low-density schemes intended primarily to reduce landscape or heritage effects may now be vulnerable under L3; whilst those which maximise density without resolving key design relationships and developing a convincing response to context, green infrastructure and movement may fail DP3.

So What? For EDP, our masterplanners recognise the need to drive hard for the efficient use of land whilst demonstrating how the resulting uses, massing and layout satisfy national design principles. Schemes should be recognised as fit for purpose/great places to live whilst protecting and celebrating the most important aspects of the environment.

Further insights from EDP include this great review by [Gareth Howell](#), Masterplanner and Director at EDP: [Why the New NPPF Should Make Us Ask Better Design Questions](#).

Response #3: Natural Environment

Here we consider how the NPPF addresses the natural-environment. Changes which combine continued protection for the highest status assets with reduced local discretion.

Local Nature Recovery Strategies (LNRS) Our first observation is they are now more prominent. The NPPF states that plans should use LNRSs and related evidence to identify landscape and habitat restoration, nature-based solutions and cross-boundary ecological networks. Development should connect with wider networks, use green infrastructure to deliver multiple benefits and provide for long-term management. However, whilst these changes move consideration of ecology beyond a site-based mitigation exercise, LNRS identification does not protect land from development: N1 states that nature-recovery opportunities should inform integration with development but need not prevent allocation. In that sense, LNRSs remain an opportunity rather than a constraint.

Mitigation Hierarchy Despite previous moves to remove it in the drafting, the mitigation hierarchy has survived. Significant biodiversity harm that cannot be avoided, mitigated or compensated should result in refusal. N6 retains graduated protection for international, national and local sites, alongside a direct refusal policy for loss or deterioration of irreplaceable habitats unless wholly exceptional reasons and compensation exist. It also introduces the option for impacts on sites of international and national importance to be addressed at a landscape scale by paying into a nature restoration levy towards an adopted Environmental Delivery Plan.

Such plans will initially be rolled out to deal with nutrient neutrality matters, something we're closely monitoring. They're reflective, alongside the additional weighting given to LNRSs, of the government's desire to take a more strategic landscape scale approach to nature protection and restoration and facilitate site level planning decisions.

Protected Landscapes Nationally designated landscapes retain the highest levels of protection. The final version restores “should be refused” for major development within Protected Landscapes unless exceptional circumstances and the public-interest test are satisfied. The previous requirement to give “great weight” to landscape and scenic beauty has become “substantial weight” (the change is understood to arise from an attempt to standardise language across the NPPF).

Outside designated landscapes and sites, landscape effects remain matters to be weighed, rather than an ‘in principle’ development constraint.

Grey-belt exclusions Its definition no longer excludes ecological, landscape, Green Belt, heritage and other ‘footnote 7’ areas (which would provide a strong reason for refusing or restricting development). Such land may therefore satisfy the grey-belt definition, although the relevant environmental, landscape, flood-risk and heritage policies continue to apply separately.

Biodiversity Net Gain (BNG) requirements: The clearest reduction in local discretion. Higher local requirements can apply only to specific site allocations where fully justified and deliverable. Other local policies seeking more than the statutory minimum (currently 10%) should receive no weight. This constrains authorities that have adopted general 15% or 20% policy requirements, although developers can still offer more voluntarily.

Trees now have a dedicated decision-making policy. N3 retains tree-lined streets but adds clearer expectations for climate-resilient species selection, arboricultural advice, infrastructure coordination and long-term maintenance. Contrary to draft proposals, no national canopy standard has been introduced, and definitions for ancient and veteran trees have not changed. Given our experience of addressing canopy standards, the absence of this policy is somewhat of a relief given the challenges in assessing and meeting targets.

So what? The direction of travel is increasingly clear: successful development will need to treat green infrastructure as a coordinated, multifunctional framework from the outset, rather than as a series of separate landscape, ecology, drainage and biodiversity interventions added later in the design process. This coordinated approach is already central to the way EDP works. By bringing our disciplines together early, we can ensure that environmental evidence genuinely shapes the masterplan and helps deliver multiple benefits through a single, integrated green infrastructure framework.

Alongside changes to national policy, EDP continues to monitor and review all changes to legislation, case law, guidance and discipline specific methodologies for all aspects of the natural environment. Whether it be the emergence of Environmental Delivery Plans, ongoing implementation and evolution of BNG rules, or the forthcoming update to BS5837, you can be sure we can provide you with the latest position set against a broad range of UK based project examples and experience.

Response #4: Heritage

Our final article in this series provides an overview of how the new NPPF addresses heritage – with changes which largely preserve the established heritage tests but recast them in a more structured and formulaic form. Its most important changes concern earlier evidence, closer integration with design, clearer treatment of different levels of effect and the weight heritage harm carries when set against a more strongly pro-development decision-making framework elsewhere in the NPPF.

Development Plans The NPPF directs that plans should be informed by proportionate heritage assessment and supported by local heritage lists.

Levels of harm At application stage, HE5 requires effects to be identified as positive, no effect, harm, substantial harm or total loss. Standardising levels of harm largely codifies existing practice and guidance but gives it greater policy prominence.

The phrase “less than substantial harm” has disappeared. However, the underlying exercise has not: harm below the substantial-harm threshold is still weighed against public benefits, while substantial harm and total loss remain subject to a much more demanding refusal test – expect the phrase to remain in common use!

Designated Assets Any harm to a designated asset still requires clear and convincing justification and is a matter of considerable importance and weight. Substantial harm or total loss will normally be refused (the change from “great weight” to “substantial weight” is understood to arise from attempt to standardise language across the NPPF).

Non-designated Assets These receive a more graduated policy with the acknowledgement of substantial harm for such assets for the first time. Both substantial harm and harm falling below the 'substantial harm' threshold remain subject to a balanced judgement, but the NPPF now clarifies that all such impacts should be weighed against the benefits of the proposals. This provides a clearer mechanism for decision makers to consider effects on non-designated assets.

Positive Effects Positive effects on designated and non-designated assets are expressly supported by the NPPF, reinforcing the need for proposals to seek these opportunities where possible and clearly articulate any positive effects on heritage assets in planning submissions. Notably, the long-term ‘reuse’ of vacant or underused listed buildings and energy-efficiency measures are identified as potential public benefits, with there no longer being a requirement to demonstrate ‘optimum viable use’.

Other The NPPF now expressly states that archaeological assessment and, where necessary, evaluation should inform the design, mitigation and implementation of development, rather than merely accompany the application, once more reinforcing the need for early consideration of historic environment matters in the formation of development proposals.

So what? The changes to heritage policy are not onerous, but the challenge remains predicting decision makers' and consultees' opinions on levels of harm – and the manner in which these are weighed in the planning balance. Clear and convincing arguments, supported by robust assessment that explicitly articulates any harm as well as benefits, remains central to managing risk – particularly as case law evolves in the context of the push for growth.

If you want to discuss these matters relating to the NPPF or your environmental planning needs in general, please do get in touch with me at ben.rosedale@edp-uk.co.uk.