



CLA NPPF Consultation Response Explanatory Notes

What this document is for

This document is intended to help you respond to the questions in the NPPF consultation which the CLA has identified as being of high importance to our members.

- *It includes explanations of the different questions and, where relevant, clarifies the CLA's position. Please use this document as a guideline for your own response to the consultation (pages 1-5)*
- *After the explanation of the questions, this document includes a List of Policies, which provides the government's precise wording. Where specific policies are mentioned in the CLA's explanation of the questions, links are included to take you to the relevant policy.*

*Our experience is that if we provide you with pre-drafted answers that leads to many responses looking alike, and they will be disregarded by government. **So please use your own wording in your responses.***

Please note that you do not have to answer every question, only those that you have a view on.

Planning Application Information Requirements

Question 22 of the consultation focusses on a new policy that will promote a more consistent approach to the requirements for a planning application. It seeks to reduce what a local authority can request is submitted with a planning application.

Requirements for information to accompany planning applications has become excessive and, in many cases, is disproportionate. This results in high application costs that exceed thousands of pounds. Members must now treat planning applications as investments, despite the high level of risk regarding the outcome. Often, Planning Officers request additional information that exceeds that which is necessary for a planning application, this leads to delays and hinders growth.

In 2024, a CLA planning survey identified that 72% of members had abandoned plans to invest in their business due to problems with the planning system. 70% of those that had abandoned plans spent between £5,000 and £50,000 on projects.

The CLA support the reduction of information required to accompany a planning application, particularly for small and medium sized developments. Information supporting a planning application should be relevant to not only the size of the proposal but also the overall impact and its location.

QUESTION 22) Do you agree with the [policy DM2](#) on information requirements for planning applications? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

- a) Please provide your reasons, particularly if you disagree.

Development Outside Settlements

In the past, a presumption in favour of sustainable development has been seen as a ‘golden thread’ throughout the NPPF. This requires local authorities to approve proposals that align with up-to-date local plans. In cases where there is not an up-to-date local plan, proposals should be approved unless adverse impacts outweigh any benefits. This principle has been retained but a ‘presumption for suitably located development’ has been introduced, revising how the existing presumption operates.

New policies ([S4: Principle of Development Within Settlements](#) and [S5: Principle of Development Outside Settlements](#)) have been introduced and require planning decisions to be made depending on where the development is located (within or outside a settlement). This means that at a national level, proposals outside settlements will be dealt with by an appropriately prepared policy across the board, creating consistency. It will also ensure that proposals in rural areas are not dealt with via policies created for the urban environment.

[Policy S4](#) builds on changes introduced into the NPPF 2024 which required a ‘brownfield first approach’. The new approach acknowledges that there are non-brownfield land sites within settlements that are also appropriate for development which the CLA support.

[Policy S5](#) sets out development that is deemed as acceptable outside settlements (excluding Green Belt and Local Open Spaces which have their own policies). This policy is more restrictive than [S4](#) as it seeks to prevent ‘unsustainable patterns of growth and conserve rural character’.

QUESTION 38) Do you agree to [the proposed approach to development outside settlements](#)? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

- a) Please provide your reasons, particularly if you disagree.

QUESTION 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? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

- a) Please provide your reasons.

Rural Exception Sites

The government is continuing to investigate ways to boost social and affordable housing, including greater support for Rural Exception Sites (RES). The draft NPPF has clarified previous policies to make national policy clearer on the acceptability of exception site proposals.

To address issues related to land values and the delivery of RESs, the consultation proposes the removal of First Homes exception sites to reduce competition with RESs. The consultation also seeks views on using a benchmark land value of £10,000 a plot, 5x agricultural value or existing use value to support delivery. Setting a benchmark for these types of sites would avoid delays and difficulties experienced when securing sites and ensure that schemes can be delivered viably – hopefully increasing delivery. This benchmark is widely used by Homes England and local authorities when assessing viability on rural exception sites, so the proposal is putting into policy what largely already happens in practice. To reflect higher agricultural values, the CLA and others working in the rural housing sector are debating a combined response of increasing the benchmark to £13,000 a plot, 5x agricultural value, or 1.5x existing use value, whichever is the higher.

Whilst these proposals are positive and the CLA will support these, the introduction of a Planning Passport for RES would go further and the CLA will continue to lobby for this.

The Planning Passport will require amendment to the Town and Country Planning (Permission in Principle) Order 2017 to include a RES Permission in Principle (RES PiP) that requires the applicant to state the location, number of dwellings and proposed tenure mix at a first stage. This would improve delivery as we hear that RES schemes experience significant delays at the planning application stage because of an uncertainty that the home delivered will be genuinely affordable and the tenure mix will not be altered. This delay results in increased risk and costs for landowners, registered providers of social housing (RPs) and Community Led Housing groups developing RES schemes. The uncertainty, increased cost, and lengthy delays discourage these groups from beginning an RES scheme. A second stage application would then follow known as a 'Technical Details application'.

Further to the proposals to support RESs, there is also better support for the provision of social and affordable housing in rural areas through a change to the definition of Designated Rural Areas (DRAs).

2024 Definition	National Parks, National Landscapes and areas designated as 'rural' under Section 157 of the Housing Act 1985.
2026 Definition	National Parks, National Landscapes, areas designated as rural under Section 157 of the Housing Act 1985 ¹ , and other areas with a population of 3,000 or less and a population density of two persons or less per hectare.

This change will extend the coverage of DRAs to 91% of all parishes with a population of 3,000 or fewer and allow affordable housing contributions to be sought on minor developments (less than 10 dwellings) in these areas. This will increase the supply of rural affordable housing and reduce the need for RESs which is a good thing.

QUESTION 56) Do you agree our proposed changes to the definition of designated rural areas will better support rural social and affordable housing? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

QUESTION 75) Do you agree the proposals provide adequate additional support for rural exception sites? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

- a) Please provide your reasons, including what other changes may be needed to increase their uptake?

The Rural Economy

Previous NPPF policies covering the rural economy have been expanded within the draft NPPF, as requested by the CLA in 2024. [Draft Policy E2](#) (meeting the need for business land and premises) is a new policy and proposes that when determining planning applications, substantial weight is given to the benefits for domestic food production, animal welfare and the environment which can be demonstrated through development for farm and agricultural modernisation.

[Policy E4](#) (rural business development) strengthens support for agricultural development and diversification and aligns with Policies [S4](#) and [S5](#). This is beneficial for those members that are unable to use permitted development rights for these types of development as it provides them with stronger support at a national planning policy level.

Notably, [Policy E4](#) references development to 'maintain and enhance farm viability and sustainability', and is in line with the recommendations of the recent Farm Profitability Review. The policy will now support development for livestock accommodation, on-farm reservoirs, greenhouses, polytunnels, farm shops and accommodation for seasonal workers.

Whilst the policy is a win for the CLA and better acknowledges the rural economy within planning policy, there is room for improvement. The CLA will respond to the consultation suggesting that temporary accommodation for seasonal workers is expanded to other land-based businesses, not just agriculture. In addition, the development of new rural businesses must be acknowledged in addition to those that exist and require development/diversification.

The CLA continues to lobby for improved training of Planning Officers on rural issues and agricultural matters. The reference of specific types of rural development within [Policy E4](#) emphasises this need and this will be made clear throughout the CLA's response to the consultation.

QUESTION 85) Do you agree with the approach to meeting the need for business land and premises in [policy E2](#)? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

- a) Please provide your reasons, particularly if you disagree.

QUESTION 87) Do you agree with the approach to rural business development in [policy E4](#)? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

- a) Please provide your reasons, particularly if you disagree.

LIST OF POLICIES

Please be aware that links to the annexes are external links to the NPPF. All other links are internal.

Policy DM2: Information requirements

1. To ensure a clear and consistent approach to the information required to determine development proposals, local validation lists setting out the information required in support of an application for development should include the information specified in the relevant national decision-making policies (summarised in [Annex C](#)).
2. Local validation lists should only include additional information requirements if there is a policy in the development plan requiring a specific further assessment. Any such additional information requirements should not be applied equally to all applications but should be proportionate to the scale of development and its potential impact. Where appropriate, the requirements should clearly distinguish between what is required for major, medium and other types of development proposal.

Policy S4: Principle of development within settlements

1. Development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework.
2. In applying policy S4, the circumstances in which the benefits of approving development are likely to be substantially outweighed by adverse effects include (but are not restricted to) situations where the development proposal would:
 - a) Have an unacceptable impact in relation to:
 - i. the allocation or safeguarding of land for particular uses in the development plan, unless there is no reasonable prospect of an application coming forward for the allocated use, or there is evidence that the safeguarding is no longer appropriate; or
 - ii. the application of the policies in this Framework for safeguarding existing open space, sport and recreation facilities ([HC7](#)), Local Green Space ([HC8](#)), designated wildlife habitats ([N6](#)) and for managing development within residential curtilages ([L2](#)); or
 - b) Involve the whole or partial loss of undeveloped land which is used for a cemetery or burial ground; or for water storage and/or flood risk management (unless suitable compensatory provision is made which does not increase the risk of flooding either on or off-site); or
 - c) Fail to comply with one of the national decision-making policies which state that development proposals should be refused in specific circumstances.

Policy S5: Principle of development outside settlements

1. Only certain forms of development should be approved outside settlements, as set out in the following list. These should be approved, unless the benefits of doing so would be

substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework:

- a) Development proposals which are for: agriculture, horticulture and forestry; outdoor sport and recreation; allotments; cemeteries and burial grounds; mineral extraction; engineering operations and infrastructure (including for transport, energy and water); roadside facilities in accordance with [policy TR5](#); and national defence and security;
- b) Development for rural businesses and services, including tourism, where a location outside settlements is shown to be necessary;
- c) The re-use, extension, alteration or replacement of an existing building, so long as the existing building is of permanent and substantial construction, and any extension or alteration will not result in a disproportionate increase in size compared to the existing building¹;
- d) The redevelopment of previously developed land (including a material change of use to residential or mixed-use including residential);
- e) Limited infilling within groups of houses;
- f) An exception site as provided for in [policy HO10](#), or development brought forward under a Community Right to Build Order or Neighbourhood Development Order;
- g) Development which would address an evidenced unmet need for gypsy, traveller or travelling showpeople accommodation², provided it meets the criteria in [policy HO12](#);
- h) Development for housing and mixed-use development which would be: within reasonable walking distance of a railway station which provides a high level of connectivity to jobs and services³; physically well-related to a railway station or a settlement within which the station is located; is of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure; and where the development would not prejudice any proposals for long term comprehensive development in the same location;
- i) The development of land allocated for that purpose in the development plan (where this lies outside settlements); and
- j) Development which would address an evidenced unmet need (including, but not limited to, development proposals involving the provision of housing where the local planning authority cannot demonstrate a five year supply of deliverable housing sites⁴ or scores below 75% in the most recent Housing Delivery Test⁵), and where the development would:

¹ The existing building is to be assessed as the property as existing on the date of the publication of this Framework.

² Including (but not limited to) where the relevant local planning authority lacks a five year supply of deliverable sites as set out in [policy HO3\(1\)\(c\)](#).

³ Well-connected rail stations and underground, tram and light rail stops are those in a top 60 Travel to Work Area located partially or fully within England by Gross Value Added (GVA) and which, in the normal weekday timetable, are served (or have a reasonable prospect of being served due to planned upgrades or through agreement with the rail operator) throughout the daytime by four trains or trams per hour overall, or two trains or trams per hour in any one direction.

⁴ See [Annex D: Housing calculations and supply](#).

⁵ See [Annex D: Housing calculations and supply](#).

- i. be well related to an existing settlement⁶ (unless the nature of the development would make this inappropriate) and be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure; or
 - ii. comprise major development for storage and distribution purposes which accords with [policy E3](#).
2. In applying this policy, the circumstances in which the benefits of approving development proposals are likely to be substantially outweighed by adverse effects include, but are not restricted to, situations where the development proposal would fail to comply with one of the national decision-making policies which state that development proposals should be refused in specific circumstances.
3. Development proposals comprising isolated homes, which are those lying outside settlements or groups of houses, should not be approved other than in accordance with [policy HO11](#).
4. Any other development proposals which do not fall within one of the categories set out above should only be approved in exceptional circumstances, where the benefits of the proposal would substantially outweigh the adverse effects, including to the character of the countryside and in relation to promoting sustainable patterns of movement.
5. The preceding parts of this policy do not apply to development proposals in the Green Belt or on land designated as Local Green Space, which should instead be determined in accordance with policies [HC8](#), [GB6](#), [GB7](#) and [GB8](#). However, where development is not inappropriate in the Green Belt (as set out in [policy GB7](#)), proposals should also be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework.

Policy TR3: Locating development in sustainable locations

1. So that development is located where it can support sustainable patterns of movement, enable good accessibility for different users and make the most of existing and proposed transport infrastructure, development proposals should reflect the following principles, taking into account the vision for the site, the type of development and its location:
 - a. Development proposals which could generate a significant amount of movement, in the context of the area within which they would be situated, should be in locations that are, or can be made sustainable, by limiting the need to travel and offering a genuine choice of transport modes for residents and users, unless the nature of the use makes this impractical;
 - b. Opportunities should be taken to utilise existing or proposed transport infrastructure in optimising the amount or density of development which can be accommodated in different locations, especially where this can support more walking, wheeling, cycling and public transport use⁷;

⁶ Where a development proposal is located outside a settlement, and separated from the existing built-up area by virtue of being beyond the outside edge of an allocated site that has yet to be fully developed, consideration should be given to whether the proposal is in a suitable location should the allocated development not proceed.

⁷ In the case of development proposals involving the provision of traveller sites, particular reference should be made to [policy HO12](#).

- c. The environmental impacts of traffic and transport infrastructure should be identified, assessed and taken into account – including taking opportunities to avoid or mitigate any adverse environmental effects, and to secure net environmental gains such as reductions in air pollution;
 - d. In rural areas, opportunities to improve wheeling, cycling and public transport and enhance the connectivity of an area should be taken where they exist and can be supported by the development proposed.
2. The Connectivity Tool ([Connectivity Tool - GOV.UK](#)) should be used alongside other relevant evidence in assessing the connectivity of particular locations proposed for development.

Policy TR5: Roadside Facilities

1. Development proposals for roadside facilities located outside settlements should:
 - a. Meet an evidenced need to improve the safety and welfare of road users, or to improve access to electric vehicle charging infrastructure or other alternative fuels, if new or significantly expanded facilities are being proposed. This includes the provision of overnight lorry parking facilities to address any local or wider shortages and reduce the risk of parking in locations which lack appropriate facilities or could cause a nuisance; or
 - b. Improve driver welfare and security, support changes in transport technology, or improve environmental impacts (such as through the facility's design, landscaping or measures to support climate change mitigation), where the proposal is to upgrade existing facilities without significant expansion.
2. Development proposals should not result in the loss of existing roadside facilities unless alternative provision with good access to the strategic transport network is likely to be provided in the local area, or it can be shown that the facility is no longer needed or viable.

Policy HO1: Assessing the need for homes

1. The preparation of spatial development strategies, and local plans where a spatial development strategy is not in place, should be based upon:
 - a) A housing need assessment that establishes the overall number of homes needed in the area as a minimum over the plan period, using the standard method in [Annex D](#);
 - b) An assessment of the permanent and transit site accommodation needs of travellers in the area; and
 - c) An understanding of any accommodation needs that cannot be met within neighbouring areas.
2. At the most appropriate level, development plans should also take into account an assessment of the size, type and tenure of housing or other accommodation needed for different groups. These groups include, but are not limited to:
 - a) Those who require affordable housing (including Social Rent) as defined in the glossary;

- b) Older people (including those who require retirement housing, housing-with-care and care homes);
- c) Disabled people;
- d) People who rent their homes;
- e) Families with children;
- f) Looked after children (evidence of need for which can be found in the relevant local authority's Children's Social Care Sufficiency Strategy);
- g) Specialist community-based accommodation (where evidence of need is available for the relevant local authority);
- h) Students;
- i) Travellers; and
- j) People wishing to commission or build their own homes⁸.

Policy HO3: Providing Land for Homes (1)(c)

1. Local plans should identify a sufficient supply and mix of sites to meet or exceed the housing requirement figure and pitch and plot requirements for their areas over the plan period, drawing on the land availability assessment in accordance with [policy PM9](#). This should include:
 - a. A trajectory showing the expected rate of housing and pitch and plot delivery over the plan period and, where appropriate, the anticipated rate of development for specific sites.

Policy HO5: Meeting the needs of different groups

1. The development plan should, at the most appropriate level, set out policies to address the housing needs of different groups assessed under [policy HO1](#). This should include:
 - a) In relation to affordable housing:
 - i. setting requirements for the type and mix of affordable housing (applying the definition in [Annex B](#)) required to meet identified local needs, including the minimum proportion of Social Rent homes required, as part of major development. In Designated Rural Areas, development plans may set affordable housing requirements for residential developments which are not major development; and
 - ii. setting a specific affordable housing requirement (or requirements) for major development involving the provision of housing on land which is proposed to be

⁸ Under section 1 of the Self Build and Custom Housebuilding Act 2015, local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building. They are also subject to duties under sections 2 and 2A of that Act to have regard to this and to give enough suitable development permissions to meet the identified demand. Self and custom-build properties could provide market or affordable housing.

released from the Green Belt, or which may be approved on land within the Green Belt⁹.

- b) In relation to accessible housing, setting out the proportion of new housing that should be delivered to requirement M4(2) and M4(3) of the Building Regulations. M4(2) requirements should reflect local levels of need, and should ensure that at least 40% of new housing delivered over the course of the plan is delivered to M4(2) or M4(3) standards.
- c) Identifying sites, or setting requirements for parts of allocated sites, which can provide specific types of housing where there is an identified need, including (but not limited to):
 - i. specialist housing for older people;
 - ii. purpose-built accommodation for students;
 - iii. plots for self and custom build housing; and
 - iv. sites suitable for gypsies and travellers and travelling showpeople, including sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents. Sites identified for travelling showpeople should have regard to their need for mixed-use yards with both residential accommodation and space for storage of equipment.
- d) Setting out policies for the mix of tenures to be provided on sites for 150 homes or more. This mix should be informed by the needs of different groups assessed under [policy HO1](#).

Policy HO10: Exception Sites

1. Development proposals for housing or traveller sites on land not already allocated for this purpose, and which are located outside settlements, should be supported where they are:
 - a. A rural exception site (as defined in the glossary of this Framework) that will provide affordable housing or affordable traveller sites to meet identified local needs – as evidenced through a local housing needs survey or secondary data which is no more than five years old; or
 - b. Sites which comprise community-led development which would not qualify as a rural exception site, but which include one or more types of affordable housing as defined in the glossary of this Framework.
2. Unless otherwise specified in the development plan, exception sites brought forward in one of these two ways should:
 - a. Adjoin or be physically well-related to settlements;

⁹ This requirement may be set as a single rate or be set at differential rates, and should: i. be set at a higher level than that which would apply to land which is not within or proposed to be released from the Green Belt; and ii. require at least 50% of the housing to be affordable, unless this would make the development of these sites unviable (when tested in accordance with national planning practice guidance on viability).

- b. Be no larger than 1 hectare in size, or exceed 5% of the size of the existing settlement; and
- c. Comprise a majority of affordable housing or affordable traveller pitches. A proportion of market homes may be allowed on the site where essential to enable the delivery of affordable units without grant funding.

Policy HO11: Isolated homes in the countryside

1. Development proposals for isolated homes in the countryside should only be supported where one or more of the following circumstances apply:
 - a. There is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;
 - b. The development would be appropriate enabling development to secure the future of heritage assets in accordance with [policy HE5](#);
 - c. The development would re-use redundant or disused buildings and enhance its immediate setting, including specifically securing the long-term reuse of a vacant or underused listed building, weighing this against any harm as in [policy HE6](#);
 - d. The development would involve the subdivision of an existing residential building; or
 - e. The design is of exceptional quality, in that it:
 - i. is truly outstanding, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and
 - ii. would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area.

Policy HO12: Traveller Sites

1. Development proposals for traveller sites should be located and designed so that they:
 - a. Provide a settled base that limits the need for long-distance travelling and potential environmental damage caused by unauthorised encampment, while recognising the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability;
 - b. Enable access to education, welfare, and health services, including ensuring that children can attend school on a regular basis;
 - c. Promote opportunities for healthy lifestyles, such as by providing adequate landscaping and play areas for children, and minimising adverse impacts from local environmental factors (such as noise and air quality) on the health and wellbeing of travellers that may locate there; and
 - d. Do not enclose the site such that the site and its occupants appear to be isolated from the rest of the community.

2. Alongside the criteria in this policy, when considering proposals for traveller sites, local planning authorities should take into account:
 - a. The existing level of local provision and need for additional sites;
 - b. Other personal circumstances which may be relevant; and
 - c. That applications for sites from any travellers should be considered and not just those with local connections.
3. Where development proposals require the permanent or temporary relocation of an authorised traveller site, an alternative site should be identified and provided. Alternative sites should take into account existing family or community groupings where possible, and involve residents occupying existing pitches, sites or plots in planning any unavoidable relocations to ensure satisfactory solutions are achieved.

Policy PM9: Identifying land for development

1. Development plans should be informed by an assessment of the land available in their area to meet development needs.
2. For plans that allocate specific sites for development the assessment should be undertaken with reference to national guidance¹⁰ and include:
 - a. A thorough site identification process to identify a sufficient range and quantity of potential sites;
 - b. An assessment of the availability, suitability and achievability (including likely viability) of those sites;
 - c. An assessment of the amount of development those sites have the potential to accommodate and the potential timescales over which development could be delivered¹¹; and
 - d. The identification of the most appropriate sites for development taking into account the emerging vision and spatial strategy of the plan and the information above.

Policy HE5: Assessing effects on heritage assets

1. Development proposals affecting heritage assets should be accompanied by an assessment of the significance of the assets affected (including any contribution made by their setting) and of the potential effect of the proposal on their significance. The level of detail should be proportionate to the assets' importance and no more than is necessary to understand the potential effect of the proposal on their significance. The relevant historic environment record should be consulted as a minimum, and appropriate expertise employed where necessary.

¹⁰ Relevant tools and templates are published in [Create or update a local plan using the new system - GOV.UK](#).

¹¹ Taking into account the policies in this Framework, associated infrastructure requirements and their potential to be addressed, and the impact of any relevant environmental plans or strategies (including Environmental Delivery Plans).

2. Assessments of the potential effects of development proposals on heritage assets and their setting should identify whether proposals would be likely to:
 - a. Have a positive effect, which is where a heritage asset would be enhanced, or its significance better revealed; or
 - b. Have no effect on the significance of the asset; or
 - c. Result in harm to the significance of the heritage asset, either from work affecting the asset itself or from development within its setting. The degree of harm should be identified: substantial harm would occur where the development proposal would seriously affect a key element of the asset's significance; or
 - d. Cause the total loss of the significance of the heritage asset.
3. In making this assessment it is the effect on an asset's significance rather than the scale of the development which should be considered.
4. Decision makers should be satisfied that this assessment accurately reflects the effects on heritage assets caused by the proposals.
5. Where a development proposal involves, or has the potential to involve, heritage assets with archaeological interest, an appropriate desk-based assessment should be employed and, where necessary, a field evaluation.

Policy HE6: Proposals affecting designated heritage assets

1. When considering the potential effect of a development proposal on a designated heritage asset, substantial weight¹² should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential effect amounts to a positive effect, harm, substantial harm, or total loss of its significance.
2. Development proposals which would have a positive effect on designated heritage assets should be approved.
3. Where a development proposal would harm the significance of a designated heritage asset the effect on the asset and its significance should be weighed against any public benefits resulting from the proposal. Important public benefits can include securing the long-term re-use of a vacant or underused listed building, and enabling energy efficiency and low carbon heating measures to be employed.
4. Where a development proposal would cause substantial harm to, or the total loss of, the significance of a designated heritage asset, consent should be refused unless it can be demonstrated that the development is necessary to achieve substantial public benefits that outweigh the harm or loss, or if all of the following apply:
 - a. The nature of the heritage asset would otherwise prevent all reasonable uses of the site; and

¹² The use of "substantial weight" here is to be applied in line with statutory tests so as to discharge the duties which require considerable importance and weight to be given to harm to the relevant designated assets.

- b. No suitable use for the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
 - c. Conservation by grant-funding or some form of not for profit, charitable or public ownership is not possible; and
 - d. The harm or loss is outweighed by the benefit of bringing the asset back into use.
5. Within this context, development which would cause substantial harm to, or the total loss of, the significance of grade II listed buildings, or grade II registered parks or gardens, should be exceptional; while development which would cause substantial harm to, or the total loss of, assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional¹³.

Policy HC7: Development affecting existing recreation facilities

1. Development proposals should not result in the loss of existing open space, sports and recreational buildings and land, including playing fields, other formal and informal play space and allotments, unless:
 - a) An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
 - b) The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and/or quality, in a location which offers comparable or improved accessibility for the community it serves; or
 - c) The development is for alternative sports, play or other recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

Policy HC8: Development affecting Local Green Space

1. Development proposals for land which has been designated as Local Green Space should be determined in a manner consistent with the relevant national decision-making policies for land in the Green Belt, excluding provisions relating to grey belt and previously developed land.

Policy GB6: Control of development in the Green Belt

1. Development in the Green Belt is inappropriate unless it falls within one of the categories in [policy GB7](#).
2. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Such circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness and any other harm resulting from the proposed development, is clearly outweighed by other considerations.

¹³ Monuments that the Secretary of State for Culture, Media and Sport has identified as being of national importance but has decided not to designate as a Scheduled Monument (or as a different type of designated heritage asset) should be considered subject to the policies for designated heritage assets. Monuments that have yet to be assessed by the Secretary of State for Culture, Media and Sport through the scheduling process, but which a decision maker considers to potentially be of national importance, should be considered subject to the policies for designated heritage assets.

In making this assessment, substantial weight should be given to the harm to the Green Belt which would be caused, including harm to its openness.

3. In the case of proposals for renewable and low carbon energy development, very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.

Policy GB7: Development which is not inappropriate in the Green Belt

1. The following categories of development are not inappropriate in the Green Belt, and therefore should not be regarded as harmful to the Green Belt or required to demonstrate very special circumstances:
 - a. Development which is for agriculture, horticulture and forestry;
 - b. The re-use, extension, alteration or replacement of an existing building, provided that:
 - i. the existing building is of permanent and substantial construction; and
 - ii. the extension or alteration will not result in a disproportionate increase in size over and above the size of the original building¹⁴; or
 - iii. in the case of proposals for a replacement building, it is in the same use and not materially larger than the one it replaces.
 - c. Limited infilling in villages;
 - d. Limited affordable housing for local community needs under policies set out in this Framework or the development plan (for instance, on a rural exception site);
 - e. The redevelopment of previously developed land (including a material change of use to residential or mixed-use including residential), which would not cause substantial harm to the openness of the Green Belt;
 - f. Certain other forms of development provided the impact on the openness of the Green Belt is minimised, and there would not be a significant conflict with the Green Belt purposes. These are:
 - i. mineral extraction;
 - ii. engineering operations;
 - iii. transport, electricity network and water infrastructure required in a Green Belt location;
 - iv. development brought forward under a Community Right to Build Order or Neighbourhood Development Order;
 - v. material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and

¹⁴ The original building for this purpose is the building that existed on 1 July 1948 or, if constructed after 1 July 1948, as it was built originally.

- vi. the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments.
- g. Development where all of the following apply:
 - i. the development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
 - ii. there is an evidenced unmet need for the type of development proposed¹⁵;
 - iii. the development would be in a sustainable location, with particular reference to [policy TR3](#) of this Framework¹⁶; and
 - iv. In the case of major development involving the provision of housing, the development proposed complies with [policy GB8](#);
- h. Development for housing and mixed-use development which would:
 - i. be within reasonable walking distance of a railway station capable of providing a high level of connectivity to services and employment¹⁷;
 - ii. be physically well-related to a railway station or a settlement within which the station is located;
 - iii. be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure;
 - iv. not prejudice any proposals for long-term comprehensive development in the same location;
 - v. in the case of major development, comply with [policy GB8](#).

Policy GB8: The Golden Rules

1. Where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application, all of the following contributions ('Golden Rules') should be made¹⁸:

¹⁵ Which, in the case of applications involving the provision of housing, means the lack of a five year supply of deliverable housing sites, including the relevant buffer where applicable, or where the Housing Delivery Tests was below 75% of the housing requirement over the previous three years; and in the case of traveller sites means the lack of a five year supply of deliverable traveller sites.

¹⁶ In the case of development proposals involving the provision of traveller sites, particular reference should be made to [policy HO12](#).

¹⁷ Well-connected rail stations and underground, tram and light rail stops are those in a top 60 Travel to Work Area located partially or fully within England by Gross Value Added (GVA) and which, in the normal weekday timetable, are served (or have a reasonable prospect of being served due to planned upgrades or through agreement with the rail operator) throughout the daytime by four trains or trams per hour overall, or two trains per hour in any one direction.

¹⁸ The Golden Rules do not apply to: (a) developments brought forward on land released from the Green Belt through plans adopted prior to 12 December 2024; (b) developments that were granted planning permission on Green Belt land prior to 12 December 2024; or (c) Traveller sites.

- a. Affordable housing which reflects either:
 - i. development plan policy requirements for major development on land within or released from the Green Belt (as established under [policy HO5\(1\)\(a\)\(iii\)](#)); or
 - ii. until such policies are in place, a contribution which is 15 percentage points above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of a 50%¹⁹. In the absence of a pre-existing requirement for affordable housing, a 50% affordable housing contribution should apply by default.
 - b. Necessary improvements to local or national infrastructure; and
 - c. The provision of new green space, or improvements to existing green space, which is accessible to the public. New residents should be able to access good quality green spaces within a short walk of their homes, whether through on-site provision or through access to offsite spaces. This provision should:
 - i. make a positive contribution to the landscape setting of the development;
 - ii. support nature recovery; and
 - iii. meet local standards for green space provision where these exist in the development plan. Where no locally-specific standards exist, development proposals should meet national standards relevant to the development (these include Natural England standards on accessible green space and urban greening factor and Green Flag criteria). Where land has been identified as having potential for habitat creation or nature recovery within Local Nature Recovery Strategies, proposals should contribute towards these outcomes.
2. Where major development involving the provision of housing on land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application, complies with the Golden Rules, this should be given substantial weight in considering whether to grant planning permission.
 3. There are only three circumstances in which a site-specific viability assessment may be justified to allow the contributions expected by this policy to be adjusted, which are where a development proposal is:
 - a) On previously developed land;
 - b) For a multi-phase, strategic site; or
 - c) For a development model which is of a wholly different type to that assumed in the viability assessment that informed the development plan.
 4. Where the circumstances in paragraph 3 of this policy apply, development should still make the maximum possible contribution to affordable housing and other infrastructure requirements.

Policy E2: Meeting the need for business land and premises

¹⁹ The 50% cap does not apply to rural exception sites or community-led development exception sites, or if the local planning authority has a relevant existing policy which would apply to the development which is above 50%.

1. To support business growth, substantial weight should be given to:
 - a) The economic benefits of proposals for commercial development which allow businesses to invest, expand and adapt; especially where this would support the economic vision and strategy for the area, the implementation of the Industrial Strategy²⁰, support improvements in freight and logistics and/or reflect proposals for Industrial Strategy Zones and AI Growth Zones;
 - b) Benefits for domestic food production, animal welfare and the environment which can be demonstrated through proposals for development for farm and agricultural modernisation.
2. Where a development proposal is required to demonstrate whether an unmet need exists (including to demonstrate compliance with [policy S5](#)) consideration should be given to whether:
 - a) Market signals indicate an undersupply of specific types of land or premises, taking into account the anticipated catchment area for the type of development proposed, the changing needs of different sectors and the availability of existing land and buildings; or
 - b) A development proposal's specific locational requirements are met by existing allocations in the development plan. This includes, but is not limited to, situations where:
 - i. existing businesses plan to expand or improve their premises, or clusters or networks of businesses need to grow (such as clusters of knowledge and data-driven, creative or high technology industries and associated facilities and infrastructure); or
 - ii. the availability of infrastructure (such as adequate grid connections or water and wastewater capacity) makes certain locations particularly important, including opportunities to co-locate large-scale generators and users of power (such as data centres); or
 - iii. proposals would meet a local, regional or national need for the provision of new, expanded or upgraded facilities that would result in more efficient, reliable or sustainable handling of goods (whether for their receipt, storage, processing, interchange or distribution).

Policy E3: Freight and logistics

1. To support the effective and efficient movement of goods, development proposals for freight and logistics uses and associated infrastructure should:
 - a. Have good access to transport networks (including via sustainable transport modes where possible) appropriate to the type of development;
 - b. Be sited and designed to limit environmental impacts (such as through the co-location or intensification of facilities to limit vehicle movements, and sensitive

²⁰ Invest 2035: The UK's Modern Industrial Strategy (UK Government, June 2025) identifies priority sectors for growth and support as: advanced manufacturing; clean energy industries; creative industries; defence industries; digital and technology businesses; financial services; life sciences; and professional and business services.

building design and landscaping). The impact on local residents or other neighbouring uses should be acceptable, taking into account proposed mitigation, especially where night-time activity will be required; and

- c. Provide sufficient and secure parking for lorries or other vehicles to cater for the anticipated use.

Policy E4: Rural Business Development

1. In applying [policy E2](#), the sustainable growth of businesses in rural areas should be supported, including through:
 - a) The conversion of existing buildings and well-designed new buildings;
 - b) The development and diversification of agricultural and other land-based businesses;
 - c) Facilities to support rural leisure and tourism and measures to retain and expand accessible local shops and services; and
 - d) Development to maintain and enhance farm viability and sustainability and support domestic food production, such as better accommodation for livestock, on-farm reservoirs, greenhouses, polytunnels, farm shops and temporary accommodation for seasonal workers (where this accommodation is ancillary to the agricultural use and not for permanent occupation).
2. Development proposals to meet business needs in rural areas may need to be located outside settlements, and in locations that are not well served by public transport. In these circumstances:
 - a) Development proposals should take opportunities, where they exist, to use previously developed land, and sites that are physically well-related to existing development; and
 - b) The siting and design of development should be appropriate having regard to the character of its surroundings.

Policy N6: Areas of particular importance for biodiversity

1. To support the conservation of important habitats, development proposals affecting:
 - a) A site of international importance, which for the purpose of this policy is a habitats site, should be refused unless:
 - i. an appropriate assessment has concluded that the proposal will not adversely affect the integrity of the site (either individually or in combination with other developments), or that there are imperative reasons of overriding public importance; and/or
 - ii. the impact of development on the relevant protected feature of the protected site is being addressed through an Environmental Delivery Plan which has been made and the developer has committed to paying the nature restoration levy.
 - b) A site of national importance, which for the purpose of this policy is one designated as a Site of Special Scientific Interest, should only be supported if:

- i. there would be no adverse effect (either individually or in combination with other developments) on the features of special scientific interest of the SSSI; or
 - ii. the benefits of the development in the location proposed clearly outweigh both the likely impact on the features of special scientific interest, and any broader impact on the national network of Sites of Special Scientific Interest; or
 - iii. the impact of development on the relevant protected feature of the protected site is being addressed through an Environmental Delivery Plan which has been made and the developer has committed to paying the nature restoration levy.
- c) A site of local importance, which for the purpose of this policy is one designated as a Local Nature Reserve or identified as a local wildlife site, local geological site or equivalent in the development plan, should only be supported if:
- i. there would not be a significant adverse effect on the integrity of the site; or
 - ii. the benefits of development in the location proposed clearly outweigh the likely impact on the features which make the site valuable for nature conservation.
2. Irrespective of a site's status in nature conservation terms, development proposals which would entail the loss or deterioration of irreplaceable habitats (such as ancient woodlands and ancient and veteran trees) should be refused, unless there are wholly exceptional reasons²¹ and a suitable compensation strategy exists.

Policy L2: Making effective use of land

1. Substantial weight should be given to the benefits where a development proposal would achieve one or more of the following:
- a) Remediating despoiled, degraded, derelict, contaminated or unstable land;
 - b) Making better use of vacant and under-utilised land and buildings (such as by bringing back into residential use empty homes and other suitable buildings; converting space above shops; redeveloping under-utilised retail sites; and building on or above service yards, lock-ups, car parks and other transport infrastructure);
 - c) Making effective use of previously developed land and buildings through temporary uses, in situations where alternative development is anticipated within a reasonable period (including as a result of the land being allocated for an alternative purpose in the development plan);
 - d) Creating additional homes within settlements by using the airspace above existing residential and commercial premises, or through sensitive redevelopment or additional development within existing plots (including, but not limited to, the addition of mansard roofs, proposals to fill gaps in the existing roof line, the introduction of higher buildings at street corners and additional units within residential curtilages). Such proposals should:

²¹ For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitats.

- i. be consistent with the overall street scene, other than where it is appropriate to have larger buildings such as at street corners, or where specific changes are provided for through a design code which forms part of a development plan;
 - ii. maintain safe access and egress for occupiers and users, and acceptable living standards for residents and neighbours in terms of access to daylight, sunlight, privacy and external amenity space; and
 - iii. where the development would involve the use of residential curtilages, not occupy more than twice the footprint of the existing building on the site, and retain at least 50% of the non-developed area within the building curtilage²².
2. A condition of simultaneous development should not be imposed on an application for multiple upward extensions unless there is an exceptional justification.
3. Proposals for land which is not previously developed should use development footprints which optimise a site's development potential.

²² The existing building is to be assessed as the building as existing on the date of the publication of this Framework.