



HOUSE OF COMMONS

LONDON SW1A 0AA

The Rt Hon Steve Reed
Secretary of State for Housing, Communities and Local Government
(by email)

Dear Steve,

Re: Response to the National Planning Policy Framework Consultation

We are writing as Green Party Members of Parliament in response to the latest consultation on proposed reforms to the National Planning Policy Framework (NPPF).

Planning is one of the most powerful tools our government has to shape the future of our country. It has the scope to help address many of the crises facing our communities: from unaffordable housing and sky-high energy bills, to increased flooding and the depletion of our natural environment. The NPPF carries enormous responsibility.

Therefore, while we welcome certain improvements in the draft including restrictions to onshore fossil fuel expansion and clearer support for community clean energy and sustainable transport, we are concerned the proposals as they stand do not meet the scale of this ambition.

We believe it's possible to build safe, warm homes in the right places and at affordable prices, while looking after nature. But this will only happen if the government stops prioritising the interests of developers and starts requiring them to deliver genuinely affordable housing and to protect our much-loved natural environment. A new approach is desperately needed.

Below we have laid out some specific concerns with the draft NPPF which we hope your Department will consider addressing.

1. Protect and strengthen local democratic decision-making

Dr Ellie Chowns MP
Member of Parliament for North Herefordshire
House of Commons, London, SW1A 0AA

Planning must remain democratic and locally grounded. Strong local plans, co-created with residents, are essential to building consent and delivering high-quality outcomes. We are therefore concerned about the potential increased centralisation through decision-making policies and the lack of content in the draft NPPF about how the voice of communities should be heard (Better Planning Coalition, 2026; TCPA 2026). There needs to be explicit power for local councils to refuse harmful developments considering cumulative pollution and environmental impacts. We cannot have yet another revision of the planning system that serves the interests of developers, over local communities.

For locally grounded and democratic planning to succeed, local authorities must have the capacity to implement it. Many councils face severe shortages of planning officers and specialist expertise in areas such as ecology, climate assessment and urban design. Any reforms to the NPPF must therefore be accompanied by adequate long-term resourcing for local planning authorities, so they can deliver robust plans, enforce planning conditions and make well-evidenced decisions.

2. Establish a genuinely rules-based system that safeguards against unsustainable development

While we welcome the move towards a ‘rules-based’ system for approving developments, we are concerned that these changes will be of limited effect due to the many caveats contained within the framework. For example, Policy S5 states that development will be approved unless its harms ‘substantially outweigh’ its benefits. This formulation appears repeatedly and significantly narrows the legitimate grounds for refusal. If this rules-based system is to be effective, it must clearly define circumstances in which a development should not be approved, for example where it undermines climate targets or damages irreplaceable habitats. Without robust grounds for refusal, the NPPF risks opening the door yet further to developments that fail both people and the planet.

The definition of sustainable development - current and as proposed - in the NPPF is still weak. The NPPF should deliver quality of life for all within environmental limits, which is how Sustainable Development was defined by the Labour Government in the early 2000s, and recognise that lasting economic resilience goes hand in hand with respecting these limits.

3. Require developers to build a higher proportion of genuinely affordable homes to rent and to buy

With 1.3 million households on social housing waiting lists and over 170,000 children homeless, the planning system must prioritise delivering social rent homes. So we welcome

the increased emphasis on assessing local housing needs and we support moves towards minimum social rent requirements on major sites.

However, current proposals in the NPPF must go further. The 150-home threshold for tenure mix requirements is too high and the minimum percentage of affordable homes included should be increased. A national floor prevents developers from gaming local policies and viability assessments to remove affordable housing, and ensures social rent is 'priced in' at the land acquisition stage. It also stops the land speculation that drives high land prices and makes it much harder to build social housing.

We oppose the proposal to allow developers of sites up to 50 homes to pay cash instead of delivering social homes on-site, except where it can be proven that there is no affordable housing need at that location, and point to evidence which shows that cash payments rarely deliver homes (Shelter, 2026). Failing to meet local need for social rent homes should be explicit grounds for refusal of a development.

Furthermore, we call on the government to fully remove the viability test except to guarantee delivery of affordable homes at the plan-making stage and give councils power to intervene where developers claim they cannot deliver what is required.

Ultimately, the government instead must fund councils and other registered social landlords to deliver on affordable housing need, including council house acquisition, instead of putting developers in the driving seat through over reliance on delivery as a trickle-down benefit of allowing large market housing developments.

4. Allow councils to set high energy efficiency standards

Under the draft, local authorities would effectively be prevented from adopting energy efficiency standards that go above and beyond the current, inadequate building regulations for greener homes (TCPA, 2026). This means new housing will fail to address rising fuel poverty or deliver truly zero-carbon homes. Such a move would also stall the decarbonisation of the construction industry.

With nearly three million households in England living in fuel poverty (DESNZ, 2025) and extreme weather events on the rise as a result of the climate emergency, we need our homes to be fit for the future. We therefore support calls to rethink policy PM13, to make it clear that until regulations universally achieve net zero buildings, local planning authorities may adopt standards that go further, so long as such policy is evidenced and viable.

In addition, the new NPPF should mandate data centres to be sited and developed so all waste space heat is recovered from the outset.

5. Introduce robust carbon assessment requirements covering operational and embodied emissions

We welcome that draft policy CC1 references carbon assessment, but this must extend beyond site allocation to include operational emissions, embodied carbon and design choices. Without this, planning decisions will continue to lock in high-emission development. The NPPF should introduce a presumption against demolition, in favour of reclamation and reuse, as part of delivering on the intention to measure (and presumably then limit) the embodied carbon of development.

6. Reinstate and strengthen flood risk testing

Flooding is impacting homes across the country, with the Environment Agency reporting that around 5000 properties were flooded between March 2024 to April 2025 (Environment Agency, 2025). The EA estimate that 1 in 4 properties will be at risk of flooding by 2050. In this context, it is deeply concerning that the draft NPPF demonstrates a regression in flood risk policy (TCPA, 2026) and removes the requirement to apply the sequential test to sites at risk of surface water flooding. We would like to see strengthened oversight from the Lead Local Flood Authorities and precautionary approaches that go beyond previous sequential tests to direct development away from flood risk areas.

7. Strengthen nature recovery and restoration

Nature in the UK is in serious decline, with one in six species at risk of extinction, and species declining by 19% since 1970 (State of Nature Report, 2023). So whilst we welcome the recognition of locally designated wildlife sites, corrections to the definition of ancient trees and stronger hedgerow protections, the NPPF needs to be much stronger on nature.

The permissive language throughout the draft framework will weaken its ability to deliver nature recovery and restoration and thus meet statutory targets under the Environment Act 2021. For example, the Biodiversity Net Gain (BNG) policy is muted with warnings against 'higher local standards'. References to chalk streams are welcome but insufficient without firm avoidance and mitigation requirements. Protections for irreplaceable habitats, protected landscapes and Sites of Special Scientific Interest must not be diluted by an overriding presumption in favour of development. And overall, the NPPF must usher in a new era in which nature is protected, allowed to recover and restored.

8. Strengthen the protection of existing grassroots music venues

We are concerned that the proposals in the NPPF fail to explicitly incorporate the Agent of Change principle into early engagement requirements, nor does it place Agent of Change on a statutory footing. The system is still stacked against venues. By adopting the Agent of Change principles into the statutory framework, planning applications involving music venues would be required to abide by those principles in every community and in every application.

We urge the Government to revise the draft NPPF in line with these recommendations so that the planning system can genuinely deliver safe, affordable homes while restoring nature and meeting the UK's climate commitments, and we would welcome the opportunity to discuss these proposals further with your Department.

Yours sincerely,

Dr Ellie Chowns MP, North Herefordshire

Adrian Ramsay MP, Waveney Valley

Siân Berry MP, Brighton Pavilion

Carla Denyer MP, Bristol Central

Hannah Spencer MP, Gorton & Denton

Green Party Members of Parliament