

WKPS Formal Response to December 2025 NPPF Proposal Consultation



Introduction

This submission introduces and sets out the views of the Weald of Kent Protection Society (WKPS) on the consultation proposals. It is presented by a past Chair of a Local Council and former Chair of its Planning Committee.

The reforms have been considered on a chapter by chapter basis. Their implications are assessed in relation to planning outcomes, decision making, and plan led governance. While the need to deliver housing is acknowledged, a rules led approach must not displace sound spatial judgement, proper assessment of cumulative impact, realistic infrastructure planning, or democratic accountability.

Assessment Summary

The December 2025 NPPF seeks to accelerate housing delivery, improve consistency, and simplify plan preparation while retaining a plan led system. These objectives are recognised. However, the structure and wording of the proposed Framework risk undermining sound decision making in sensitive rural and historic landscapes if statutory primacy, local evidence, and professional judgement are not explicitly safeguarded.

For example, the Kent Weald is a nationally significant historic landscape of dispersed settlements and historic market towns, shaped by ancient routeways, fragile infrastructure, and a close relationship between landscape, heritage, ecology, and community life. It is not suited to standardised growth assumptions or mechanistic application of national rules. Harm typically arises through incremental and cumulative change, rather than from single large schemes.

While the need for housing growth is acknowledged, sustainable development in areas such as the Weald depends on environmental capacity, infrastructure readiness, and landscape resilience. Development that outpaces infrastructure delivery or incrementally erodes settlement identity and landscape character cannot be regarded as sustainable. In such contexts, cumulative impact arising from multiple small and medium scale developments, and reliance on nationally applied thresholds or standardised criteria, must be treated as procedural tools rather than determinants of acceptability.

The statutory plan led system must remain the cornerstone of decision making. Under section 38 (6) of the Planning and Compulsory Purchase Act 2004, decisions must be made in accordance with the Development Plan unless material considerations indicate otherwise. The Framework is non-statutory guidance and must not override adopted Local Plans or Neighbourhood Plans or weaken locally led spatial judgement.

Local Plans and Neighbourhood Plans are the only examined and democratically accountable mechanisms capable of addressing cumulative impact, settlement capacity, landscape sensitivity, and infrastructure constraints. Plan making in this context is not merely technical but democratic. National policy must allow plans to exceed baseline standards where justified by evidence and retain a clear role for professional judgement.

Effective land use in the countryside must be treated holistically, recognising its agricultural value including Grades 1, 2, and 3a, ecological networks including Local Nature Recovery Strategy areas, green corridors for biodiversity and walking and cycling, water management and flood mitigation, climate change mitigation, recreation, tourism, heritage, and future water storage. Embedding district

WKPS Formal Response to December 2025 NPPF Proposal Consultation

wide land classification and cumulative impact safeguards within plan making provides clarity, certainty, and democratic legitimacy.

Transitional arrangements must be legally robust and must not undermine the primacy of the statutory development plan. Clear safeguards are required to maintain certainty and prevent incremental harm during transition.

Part 1 Strategic Framework and Plan Making

Chapter 1 Introduction and Democratic Foundations

The national housing challenge and the intent to simplify the planning system are acknowledged.

A 15 year planning horizon is supported in principle as a means of providing long term certainty and strategic coordination. Settlement pattern, landscape structure, infrastructure fragility, historic character, and cumulative development capacity are inherently place specific. These characteristics can only be properly understood and managed through Local Plans and Neighbourhood Plans prepared from locally led evidence and informed by community knowledge.

The Kent Weald is neither uniform nor easily adaptable. Harm typically arises from the cumulative effect of incremental change, including multiple small and medium scale developments, ribbon development along roads, and the gradual erosion of spatial strategy through precedent, rather than from individual large scale proposals. These impacts cannot be properly identified or mitigated through nationally standardised criteria applied at the planning application stage, regardless of the formal “weight” assigned to policies.

Effective plan making in such contexts is also dependent on realistic infrastructure sequencing. Strategic infrastructure delivery frequently lags development by approximately 5 years. Where growth proceeds ahead of infrastructure capacity, harm may not be immediate but is nonetheless enduring. Only plan led spatial judgement exercised at the local level can ensure development aligns with land capacity, service provision, and long term community resilience.

Plan making in this context is therefore not merely a technical exercise but a core democratic function. Local Plans and Neighbourhood Plans remain the only examined, transparent, and publicly accountable mechanisms through which communities can consent to the scale, distribution, and form of development. The FPPG must support this role by guiding interpretation and consistency, rather than substituting national assumptions for locally led evidence or spatial judgement.

However, the December 2025 proposals significantly increase the cost, complexity, and risk associated with preparing and maintaining plans. Compressed preparation timescales, mandatory 5 year evidence refresh cycles, increasing technical conformity requirements, and the withdrawal of dedicated neighbourhood planning support funding place neighbourhood planning beyond the practical reach of many parish and town councils. Without access to dedicated central government funding, preparation, review, and ongoing maintenance of Neighbourhood Plans will, in practice, be achievable only for the most financially resourced communities. This would materially undermine universal neighbourhood planning coverage and weaken democratic participation.

Recommendations:

- a) Ensure that plan making requirements remain proportionate and achievable for parish and town councils of all sizes and capacities.
- b) Ensure that plan making requirements do not impose technical or evidential expectations that necessitate continual reliance on externally commissioned professional expertise beyond the reasonable financial capacity of parish and town councils.

WKPS Formal Response to December 2025 NPPF Proposal Consultation

- c) Ensure that objectives for effective neighbourhood planning are supported by proportionate, sustained funding and capacity building arrangements, ideally delivered through the Locality programme or an equivalent national support mechanism.
- d) Reaffirm plan making as a democratic process through which communities consent to development scale, distribution, and form, rather than as a technical compliance exercise driven by national assumptions.
- e) Reinforce the strategic purpose of the planning system by recognising the limits of nationally framed guidance and safeguarding Local Plans and Neighbourhood Plans as the primary mechanisms for addressing incremental, cumulative, and precedent based harm in sensitive landscapes such as the Kent Weald, as reflected in PM1 and PM6.

Chapter 2 Plan Making Policies

Plan making must remain fundamentally democratic. Nationally imposed defaults, conformity tests, or prescriptive thresholds should not reduce the effective scope of Local Plans, nor undermine trust in the planning system. While the December 2025 proposals reaffirm the importance of plan led development in principle, the combined effect of embedded national decision making policies, mandatory housing targets, strengthened delivery tests, and transitional arrangements materially narrows the practical discretion available to plan making authorities.

The plan led system must remain the cornerstone of planning in both law and practice. Under section 38 (6) of the Planning and Compulsory Purchase Act 2004, planning decisions must be made in accordance with the Development Plan unless material considerations indicate otherwise. The NPPF remains non-statutory guidance and cannot lawfully displace adopted Local or Neighbourhood Plans.

The introduction of clearer national decision making policies may improve consistency, reduce duplication across plans, and assist smaller authorities in maintaining up to date policy coverage. A more structured national baseline could also reduce ambiguity at appeal and improve predictability for applicants and communities. Where carefully framed, national policies may provide a shared technical foundation while leaving spatial strategy and settlement distribution to local plans. The challenge is therefore not the existence of national policy, but ensuring that its application preserves locally evidenced spatial judgement and statutory plan primacy.

The introduction of nationally applicable policies that are not designated as statutory National Development Management Policies under the Levelling Up and Regeneration Act 2023 creates a practical tension between the statutory primacy of Local Plans and operational reality. Although Local Plans must demonstrate conformity with these policies to be considered sound, the policies themselves are not statutory. In practice, this effectively gives national policy a controlling influence, which can limit local discretion, undermine locally led evidence, and constrain spatial judgement, even though the formal statutory authority of Local and Neighbourhood Plans remains unchanged.

Spatial Development Strategies (PM1) provide high level cross boundary coordination but cannot substitute for locally led evidence or detailed spatial judgement. Local Plans (PM2), prepared within 30 month timescales and reviewed within 5 years, must retain full authority to determine settlement scale, spatial distribution, and infrastructure sequencing. Neighbourhood Plans must remain effective mechanisms for securing local consent where they conform with up to date Local Plans.

In sensitive rural landscapes, nationally standardised criteria cannot adequately capture cumulative impact, settlement capacity, landscape sensitivity, or infrastructure constraints. Harm often arises incrementally through multiple small and medium scale developments, ribbon development, or the gradual erosion of plan strategy through precedent. Only locally led evidence, spatial assessment, and community informed planning can identify and manage these effects.

Where developer contributions are required (PM12), the December 2025 proposals provide insufficient clarity on procedures if contributions are not delivered. Local Plans must include evidence-

WKPS Formal Response to December 2025 NPPF Proposal Consultation

based infrastructure feasibility assessments and delivery risk mitigation to ensure that development only proceeds where obligations are met or enforceable. Without such clarity, the practical effectiveness of contributions in sustaining local infrastructure is undermined.

Recommendations

- a) Reaffirm the statutory primacy of Local Plans and Neighbourhood Plans as the legal and operational basis for plan making and decision making.
- b) Clearly distinguish statutory National Development Management Policies from non-statutory national guidance to remove ambiguity regarding their respective roles.
- c) Ensure PM1, PM2, PM5, PM6, PM8, and PM12 explicitly require locally led evidence, settlement capacity assessment, cumulative impact analysis, landscape sensitivity appraisal, infrastructure feasibility assessment, and clear procedures for developer contributions where obligations are not met.
- d) Allow Local and Neighbourhood Plans to apply locally justified standards where supported by environmental, heritage, infrastructure, or community evidence.
- e) Maintain democratic plan making by reinforcing Local and Neighbourhood Plans as the primary mechanisms for communities to consent to development scale, distribution, and form.

Chapter 3 Decision Making Policies

Greater consistency in decision making is supported in principle. However, the December 2025 proposals materially alter how decisions are made in practice. National decision making policies are intended to carry immediate material weight from publication, with conflicting Local or Neighbourhood Plan policies afforded reduced weight. This represents a shift towards a more rules based system and requires careful clarification to ensure that the statutory primacy of adopted plans under section 38 (6) of the Planning and Compulsory Purchase Act 2004 is preserved in both law and practice.

Under this framework, national policy increasingly defines acceptability in principle, while local discretion is concentrated on matters of design, mitigation, conditions, and layout. Professional judgement and elected member decision making remain formally intact, but their effective scope is narrowed where proposals meet nationally defined criteria for suitability, location, or delivery.

In sensitive rural landscapes such as the Kent Weald, harm is frequently qualitative, indirect, incremental, and cumulative rather than easily quantified. Settlement identity, coalescence risk, erosion of historic field patterns, landscape legibility, and infrastructure fragility are rarely captured by numerical thresholds or standardised locational tests. Treating compliance with national criteria as determinative risks systematic underestimation of these forms of harm and may result in mechanistic, adversarial, or unsustainable outcomes.

There is also heightened appeal risk where local decision makers exercise judgement to refuse development that is supported in principle by national policy. Without explicit policy support for context specific judgement, such decisions are more vulnerable to being overturned. Transitional arrangements must ensure that Local and Neighbourhood Plans which have not yet been reviewed continue to carry full statutory weight.

Recommendations:

- a) Clarify that compliance with national thresholds, locational tests, or delivery criteria does not automatically establish acceptability in sensitive rural or historic contexts.
- b) Explicitly retain professional and elected member judgement in assessing cumulative impact, settlement identity, coalescence, landscape character, and infrastructure resilience.

WKPS Formal Response to December 2025 NPPF Proposal Consultation

- c) Ensure locally evidenced constraints and plan led spatial judgements, including capacity and infrastructure delivery, may override national policy where incremental or cumulative harm would arise.
- d) Avoid automatic approvals where proposals would undermine settlement form, landscape function, infrastructure capacity, or long term sustainability.
- e) Protect democratic decision making by reaffirming the role of elected members in applying planning judgement within a plan led framework.
- f) Reinforce that the statutory Development Plan remains the legal basis for decision making throughout all transitional arrangements, and that national policies and Planning Practice Guidance provide interpretative support only.
- g) Ensure appeal decisions and inspector judgements respect locally adopted evidence, professional judgement, cumulative impact assessments, and context specific constraints, rather than treating compliance with national policy as determinative.

Chapter 4 Achieving Sustainable Development

The principle of sustainable development is supported. However, its application under the December 2025 proposals must remain genuinely balanced, evidence led, and capable of resulting in restraint where necessary. In the Kent Weald, sustainability cannot be reduced to housing delivery metrics, numerical thresholds, or abstract locational tests. It depends on the long term capacity of landscapes, settlements, infrastructure systems, and community services to absorb change without irreversible harm.

The Kent Weald is a constrained and highly sensitive environment where development impacts are frequently cumulative rather than immediate. Incremental growth can progressively undermine settlement identity, overload fragile infrastructure, erode tranquillity, and degrade landscape character even where individual schemes appear modest or policy compliant in isolation. Treating such development as sustainable without full contextual assessment may lead to misapplication of the presumption in favour of sustainable development in circumstances where long term environmental, social, or infrastructural effects require careful evaluation.

Sustainability in this context must therefore be assessed through plan led spatial judgement and applied as an active test in decision making. This assessment must be informed by settlement capacity, infrastructure resilience, landscape function, and heritage significance. Where these factors demonstrate clear limits to growth, restraint is not a failure of sustainable development but a legitimate and necessary outcome. Development that outpaces infrastructure delivery, relies on deferred mitigation, or incrementally erodes landscape and settlement character cannot be considered sustainable, even where short term housing supply objectives are met.

The presumption in favour of sustainable development must not operate as a mechanism to override locally evidenced constraints, democratic plan making outcomes, or cumulative impact safeguards. In sensitive rural landscapes such as the Kent Weald, sustainability requires alignment between development scale, infrastructure readiness, environmental capacity, and community consent. Where this alignment cannot be achieved, refusal must remain a clear and defensible outcome.

Recommendations:

- a) Apply S4 and S5 so that the presumption in favour of sustainable development is explicitly constrained by locally evidenced environmental limits, infrastructure capacity, landscape sensitivity, and cumulative impact, ensuring that development is only supported where it demonstrably sustains the long term social, environmental, and spatial integrity of the Kent Weald.
- b) Ensure sustainable development explicitly recognises, safeguards, and gives decisive weight to the Weald's historic, landscape, and environmental qualities as integral components of long term sustainability rather than residual considerations.

WKPS Formal Response to December 2025 NPPF Proposal Consultation

- c) Confirm that restraint and refusal remain legitimate outcomes where development would result in cumulative or irreversible harm, and that sustainability assessments remain grounded in plan led spatial judgement rather than abstract national assumptions.

Chapter 5: Meeting the Challenge of Climate Change

Climate mitigation and adaptation are strongly supported. Climate change presents an urgent and far reaching challenge, and the planning system has a vital role in reducing emissions and building resilience to long term environmental risk. In the Kent Weald, clay vales, streams, floodplains, soils, and woodlands provide essential ecosystem services including flood management, carbon sequestration, biodiversity support, water regulation, and landscape cooling. These functions are integral to climate resilience and must be safeguarded through plan making and decision making.

The Kent Weald is a constrained and environmentally sensitive landscape where climate related impacts are frequently cumulative rather than immediate. Incremental development, including climate related development, can progressively degrade ecological networks, hydrological function, tranquillity, and landscape character if not guided by landscape led spatial judgement. Climate mitigation benefits, while important, must not be treated as determinative where development would undermine long term environmental capacity, settlement resilience, or adaptive function.

Climate change policy must therefore prioritise avoidance of harm before mitigation, and adaptation must be assessed over the full lifetime of development, taking account of future climate conditions including increased flood risk, overheating, water stress, and wildfire risk. Development that relies on deferred mitigation, compromises natural flood management, or fragments landscape function cannot be considered climate resilient or sustainable.

Recommendations:

- a) Apply CC1, CC2, and CC3 so that climate mitigation and adaptation are embedded within plan led spatial strategies and decision making, explicitly recognising landscape capacity, cumulative impact, lifetime climate risk, and locally evidenced environmental limits.
- b) Energy generation and storage infrastructure should, wherever feasible, be directed to urban or industrial locations rather than sensitive rural landscapes, ensuring that the ecological, heritage, and landscape functions of the Kent Weald are safeguarded and that incremental and cumulative harm is avoided.

Part 2: Housing, Economy, and Land Use

Chapter 6: Delivering a Sufficient Supply of Homes

The urgency of increasing housing delivery is recognised. The issue raised by the December 2025 proposals is not whether homes should be delivered, but whether the mechanisms proposed will deliver the right homes, in the right places, at genuinely affordable levels, and in a manner that sustains settlements over the long term.

It is recognised that persistent under supply of housing has contributed to rising prices, reduced mobility, and pressure on younger and lower income households. Increased clarity on delivery expectations, including density in accessible locations and support for small and medium sites, may assist in accelerating supply and diversifying the market. A more predictable national framework could also reduce delay arising from protracted policy disputes. However, delivery mechanisms must ensure that increased quantity is matched by genuine affordability, infrastructure readiness, and contextual suitability.

WKPS Formal Response to December 2025 NPPF Proposal Consultation

The continued reliance on the 80 percent market rate method to define affordable housing is outdated and no longer reflects current economic conditions. In much of England, including historic rural areas such as the Kent Weald, market housing costs have become structurally detached from average local incomes. As a result, housing defined as affordable by reference to a market discount frequently remains inaccessible to households on typical local wages. This approach therefore increases nominal supply without reliably improving affordability in practice.

This disconnect is reinforced by an internal inconsistency within the Framework. Housing need is calculated using an income to house price ratio, explicitly acknowledging the relationship between earnings and affordability. Yet affordable housing delivery continues to be defined by reference to market values rather than income. This undermines the coherence of policy and weakens confidence that delivery targets reflect genuine need.

The chapter also places increased emphasis on blanket density expectations and proximity based indicators, such as access to railway stations or previously developed land. In historic rural contexts, these indicators are blunt tools. Proximity alone does not demonstrate suitability where settlement form, narrow rural lanes, limited service capacity, and sensitive townscape grain impose clear constraints. Applying uniform density expectations in such areas risks eroding character and overloading fragile infrastructure without delivering sustainable outcomes.

The principal risk arising from this approach is cumulative impact. Multiple small and medium scale developments, assessed primarily against fixed thresholds or accessibility criteria, can collectively undermine settlement identity, strain infrastructure, and weaken community cohesion while remaining policy compliant in isolation. Housing supply policy must therefore treat cumulative impact as a material consideration in both plan making and decision making, particularly in rural and historic settlements.

Recommendations:

- a) Replace the 80 percent market rate method with an income based approach to defining affordable housing, ensuring delivery reflects average local earnings rather than market discount models.
- b) Confirm that affordable housing policy should demonstrably improve access for households on typical local wages, not merely increase nominal supply.
- c) Require cumulative impact from small and medium scale development to be assessed by context, at settlement and landscape scale.
- d) Apply density expectations and accessibility indicators through locally led evidence and spatial judgement, rather than uniform national assumptions, in historic rural contexts.

Chapter 7 Building a Strong, Effective Economy

Economic growth is supported where it reinforces local character, environmental capacity, and long term economic resilience. In the Kent Weald, the economy is intrinsically linked to agriculture, tourism, and small scale rural enterprise. These sectors depend on the continued integrity of landscape quality, heritage value, settlement pattern, tranquillity, and environmental function, which together form the foundation of the area's economic viability.

A more explicit national emphasis on growth may help address regional productivity gaps, support business confidence, and reduce long distance commuting where employment is better aligned with housing. Rural diversification, where appropriately scaled, can enhance resilience and sustain local services. Clarity in economic policy may also reduce uncertainty for investment decisions. The key consideration is ensuring that growth is spatially appropriate and infrastructure aligned rather than scale driven.

WKPS Formal Response to December 2025 NPPF Proposal Consultation

The draft Framework places substantial weight on business growth, logistics, and industrial expansion. Applied without robust spatial judgement, there is a risk that development could be directed to locations where infrastructure capacity, landscape sensitivity, or settlement pattern limit its suitability.

The Kent Weald is characterised by dispersed settlements, constrained road networks, limited utility capacity, and high landscape sensitivity. Large scale logistics, warehousing, distribution, and energy intensive industrial uses would generate traffic volumes, land take, visual intrusion, and infrastructure demand that cannot be accommodated without disproportionate and lasting harm.

Economic policy must also address cumulative impact. Multiple medium scale employment sites, storage uses, or mixed industrial activities can collectively erode landscape character, overwhelm rural lanes, and undermine tourism and local amenity even where individual schemes appear policy compliant in isolation. Once established, such uses are difficult to reverse and often expand incrementally beyond their original consent, compounding long term harm.

A clear distinction is therefore required between rural enterprise that is landscape compatible and growth models dependent on scale, automation, and intensive servicing. Failure to apply this distinction risks undermining both environmental objectives and the long term sustainability of the rural economy itself.

Recommendations:

- a) Ensure that economic growth policies are applied with explicit spatial judgement so that landscape sensitive rural areas are not treated as suitable locations for large scale or intensive development.
- b) Economic development proposals affecting the Kent Weald should be assessed against cumulative impact, infrastructure capacity, traffic generation, and landscape harm, with refusal remaining a clear outcome where thresholds are exceeded.
- c) Large scale logistics, warehousing, and industrial development should be directed to existing urban or industrial locations with appropriate infrastructure and transport access.

Chapter 8 Ensuring the Vitality of Town Centres

The vitality of market towns such as Tenterden and Cranbrook is strongly supported. These centres play a vital economic, social, and cultural role within the Kent Weald and are defined by their historic street patterns, building scale, plot widths, and relationship to surrounding countryside.

Town centre policy must recognise that vitality does not equate to physical expansion, intensification, or scale change. In historic market towns, inappropriate density, oversized development, or edge of centre expansion can undermine character, displace local businesses, and erode the very qualities that attract residents and visitors.

Flexibility within the sequential approach must be applied with caution. Allowing out of scale development, edge of centre retail, or mixed use schemes that do not respect settlement grain risks hollowing out historic cores rather than supporting them. Traffic, parking pressure, servicing requirements, and visual impact are particularly acute in Wealden towns with limited capacity.

Cumulative change is again decisive. A series of individually justified departures from scale or location principles can collectively alter the function and identity of a town centre over time, without triggering a clear policy breach at any single decision point.

Recommendations:

- a) Apply TC1 Strategy for Town Centres in a manner that explicitly safeguards historic scale, settlement grain, and street pattern in market towns within the Kent Weald.

WKPS Formal Response to December 2025 NPPF Proposal Consultation

- b) Ensure that flexibility in sequential testing does not permit development that would undermine town centre character, generate cumulative traffic harm, or erode the historic relationship between town and countryside.: Require town centre proposals to demonstrate qualitative contribution to vitality rather than relying solely on floorspace, footfall, or viability metrics.

Chapter 9 Supporting High Quality Communications

High quality digital connectivity is essential for rural resilience, home working, local business, and service access. Improved broadband and mobile coverage are therefore supported in principle across the Kent Weald.

However, the physical manifestation of communications infrastructure can generate significant landscape and visual harm if poorly sited. Masts, antennae and relay stations, can intrude into skylines, ridgelines, ancient woodland edges, and long views that define the Weald's character. Once introduced, such infrastructure often sets a precedent for further installations.

Individually modest installations can collectively erode landscape character, particularly where infrastructure is incrementally added in response to coverage gaps rather than planned strategically. Digital infrastructure policy must distinguish clearly between the goal of connectivity and its delivery. Urban, industrial, and previously developed sites allow consolidation, sharing, and lower visual impact, advantages rarely available in dispersed rural landscapes.

Recommendation

- a) Support improved digital connectivity while requiring that physical communications infrastructure is planned and located to minimise landscape, visual, and cumulative harm.
- b) Direct major communications infrastructure to urban, industrial, or previously developed locations wherever feasible.
- c) In sensitive rural landscapes, require evidence that alternative locations, sharing arrangements, and less intrusive technologies have been fully explored before consent is granted.

Chapter 10: Securing Clean Energy and Water

The inclusion of water supply and wastewater infrastructure within the draft NPPF is critical to the achievement of sustainable development. Kent is a water stressed county, experiencing repeated supply interruptions and high demand pressure, as evidenced by Environment Agency drought monitoring and regional water resource assessments. These conditions demonstrate that water availability is not a marginal consideration but a fundamental limitation that must be explicitly addressed through national planning policy.

Water supply in Kent, largely provided by South East Water, is structurally constrained by low and variable rainfall, heavy reliance on chalk groundwater, limited reservoir storage, and slow recharge characteristics, as documented in regional Water Resource Management Plans and British Geological Survey analysis. Groundwater alone provides close to 80 percent of water resources in the south east, emphasising the critical dependence of the region on aquifers that recharge slowly and unevenly, particularly within chalk landscapes. Even during periods of above average national rainfall, parts of Kent frequently receive below average totals, reflecting well established east and south east rainfall gradients identified in Met Office climate data. This results in fragile groundwater recovery and limited resilience once abstraction increases in spring and summer, a pattern repeatedly observed in Environment Agency groundwater status reports. These constraints are projected to intensify under climate change, with national climate projections indicating hotter summers, longer dry spells, and a shortening of the effective recharge season.

WKPS Formal Response to December 2025 NPPF Proposal Consultation

Much of the regional water infrastructure, including mains, storage reservoirs, and treatment works, is ageing, progressively deteriorating, and operating under sustained pressure, as acknowledged in water company asset management plans and regulatory performance reporting. A significant proportion of assets are approaching or exceeding their intended operational lifespan, increasing vulnerability to operational failure, extreme weather events, and periods of peak demand. Kent also suffers from a longstanding lack of strategic storage reservoirs, a constraint recognised in national and regional water planning frameworks. The lead in timescales for new supply infrastructure mean that resilience cannot be materially improved within the next ten years.

During late 2025 and early 2026, prolonged supply interruptions affected communities across Tunbridge Wells, Maidstone, and smaller Wealden settlements, as reflected in water company incident reporting and local authority emergency coordination. These events clearly illustrate the fragility of water supply, particularly in dispersed and rural areas. The network often operates with limited redundancy, meaning that infrastructure failures can result in widespread and prolonged disruption.

In this context, even modest additional development can place disproportionate strain on the system. Planned housing growth will further exacerbate these pressures. New development will increase baseline demand in an area already classified as water stressed under Environment Agency definitions, narrowing the margin between available supply and peak seasonal demand. Achieving water neutrality for new development, through a combination of demand management, water efficiency, and offsetting measures, is essential to prevent exacerbating existing supply deficits.

If current trends continue, there will be a point at which it is no longer possible to increase water supply to serve additional housing, a risk explicitly acknowledged within long term national water resource planning. In that scenario, South East Water risks becoming locked into a recurring cycle of water supply crises, reliant on short term operational interventions rather than long term resilience. This has direct implications for plan making, housing delivery, and environmental protection. Although water companies have a statutory duty to connect new development, this duty does not guarantee a resilient or reliable supply, a distinction recognised in regulatory guidance and planning appeal decisions. The NPPF must therefore make clear that water supply and wastewater capacity are binding constraints on development.

Housing allocations should only proceed where genuinely deliverable, resilient infrastructure can be secured, appropriately phased, and supported by enforceable monitoring and delivery mechanisms. Without this clarity, there is a risk that legal obligations are assumed to equate to practical deliverability, to the detriment of communities, the environment, and the credibility of the planning system.

Recommendations

- a) **Water supply capacity:** Ensure all allocated development demonstrates deliverable and resilient water supply capacity, particularly in areas of chronic pressure, recognising that statutory connection obligations do not guarantee reliable supply. Phased housing delivery must be explicitly aligned with upgrades to storage, mains reinforcement, and treatment capacity, as set out in agreed Water Resource Management Plans and Drainage and Wastewater Management Plans. All new development should achieve water neutrality, meaning that any additional water demand is fully offset through a combination of demand reduction, efficiency measures, water reuse, or other demonstrable interventions, so that overall net consumption does not increase.
- b) **Climate resilience:** Integrate drought planning, extreme weather preparedness, and long term climate resilience measures into Local Plans and infrastructure strategies, ensuring these requirements are embedded in planning obligations and development delivery.
- c) **Wastewater and nutrient management:** Require nutrient neutrality and water quality assessments in Local Plans for catchments affecting protected habitats such as Stodmarsh. New development must avoid additional nutrient loading, enforceable mitigation, including upgraded treatment works, sustainable drainage systems, and catchment scale interventions.

WKPS Formal Response to December 2025 NPPF Proposal Consultation

- d) **Infrastructure delivery alignment:** Link housing allocations to clearly defined and independently verifiable delivery timetables for water supply and wastewater improvements, with priority given to resilience in rural and dispersed settlements. Adherence must be secured through enforceable monitoring and delivery mechanisms rather than assumed future investment.
- e) **Sustainable drainage:** Require mandatory sustainable drainage systems with effective enforcement and regulatory oversight to manage stormwater, reduce nutrient runoff, and support wider water system resilience.
- f) **Monitoring and plan alignment:** Establish robust monitoring frameworks to track infrastructure delivery, leakage reduction, wastewater upgrades, and nutrient mitigation effectiveness. Planning permissions should only be granted where verified infrastructure readiness is confirmed rather than assumed.
- g) **Location of water intensive development:** Apply a sequential, infrastructure led approach to the location of water intensive development, directing major development with high water or energy demand towards urban towns, cities, or existing industrial areas, rather than sensitive rural villages and market towns such as those in the Kent Weald, where limited water infrastructure and network capacity make reliable supply and long term resilience difficult to secure.

Part 3: Design, Environment, and Heritage

Chapter 11: Facilitating the Sustainable Use of Minerals

The sustainable use of minerals is acknowledged as important to delivering infrastructure, buildings, energy and goods needed by society and the economy. However, in sensitive rural landscapes such as the Kent Weald, mineral extraction and related infrastructure must be strictly managed to prevent unacceptable adverse impacts on landscape character, biodiversity, heritage and nearby settlements.

Recommendations:

- a) Ensure that mineral proposals in the Kent Weald demonstrate that there would be no unacceptable adverse impacts on the natural and historic environment, biodiversity, human health or settlement character, taking cumulative effects into account, as required by national policy.
- b) Require restoration and aftercare at the earliest opportunity to high standards that reinstate ecological connectivity, landscape form and visual integration with surrounding areas.
- c) Safeguard mineral resources and infrastructure through plan-making, including defining Mineral Safeguarding Areas and Consultation Areas where appropriate, to ensure local evidence and spatial judgement govern decisions.
- d) Direct mineral infrastructure, such as processing and transport facilities, to less sensitive locations where feasible, and apply enforceable operational controls for noise, dust and traffic to avoid harm to settlements and sensitive habitats.

Chapter 12: Making Effective Use of Land

National planning policy should treat land use holistically, recognising that land is not solely a resource for development. In Kent, and the rest of the country, land performs multiple interdependent functions that must be considered together through plan making and decision making. These include agricultural productivity, ecological networks including land identified through Local Nature Recovery Strategies, landscape character, water management, climate change mitigation, flood prevention, recreation, leisure, sport, tourism, and cultural and heritage value. These functions interact spatially and cumulatively and cannot be adequately assessed through density targets or site yield alone.

The Weald is defined by a fine grained settlement pattern in which towns and villages are closely integrated with the surrounding countryside. This historic relationship between land use, landscape form, and settlement scale underpins environmental resilience, local identity, and community

WKPS Formal Response to December 2025 NPPF Proposal Consultation

wellbeing. Development that fails to respect this structure risks incremental erosion of landscape continuity, ecological connectivity, and the setting of historic settlements.

Agricultural land and open landscapes in the Weald perform long term strategic functions including food production, carbon storage, biodiversity support, surface water management, flood attenuation, and landscape continuity. The loss of agricultural land classified as Grades 1, 2, and 3a is effectively irreversible and represents permanent strategic harm, undermining food security as a critical economic and national security objective, alongside climate resilience, ecological continuity, and the rural economy. The draft 2025 National Planning Policy Framework does not adequately protect food-producing land in the context of these risks, particularly given climate change, global supply chain vulnerabilities, and past loss of high quality agricultural land to housing and other development. Protecting such land is essential not only for local food production and rural livelihoods, but also for national resilience to potential food shortages, price shocks, and supply disruptions.

Land also provides essential space for recreation, leisure, sport, tourism, and active travel. Green corridors play a critical role by linking habitats, supporting walking and cycling, delivering Local Nature Recovery Strategies, and contributing to public health, climate adaptation, and landscape coherence. Land is central to water management and long term resilience, including groundwater recharge, natural water capture, floodplain function, and the safeguarding of land required for future strategic water storage such as reservoirs. Failure to protect land with water management potential risks constraining future resilience to climate change, drought, population growth, and food security.

Effective land use planning must therefore be grounded in environmental capacity, cumulative impact, and long term land function. Site by site decision making risks masking irreversible harm, particularly in sensitive market towns and villages where infrastructure capacity is limited and landscape, heritage, agricultural, ecological, and water systems are vulnerable to incremental change. A robust plan led approach that clearly distinguishes land suitable for sustainable development from land requiring strong protection is essential to delivering sustainable growth and safeguarding national food security.

Recommendations

- a) Require every local planning authority to prepare, maintain, and publish an up to date district wide Land Classification identifying land suitable for sustainable housing, employment, and urban intensification, and land requiring strong protection due to agricultural value (Grades 1, 2, and 3a) and food security importance, landscape sensitivity, heritage significance, ecological function including Local Nature Recovery Strategies, recreational and tourism use, water management, climate change mitigation, flood prevention, and future water storage potential.
- b) Ensure all land use decisions are guided by evidence based spatial frameworks embedded within plan led policies, assessing settlement scale and character, landscape function, ecological connectivity, agricultural quality, food production capacity, water management capacity including future storage needs, and cumulative impacts.
- c) Identify, protect, and enhance multifunctional green corridors that maintain landscape continuity, deliver ecological connectivity, support Local Nature Recovery Strategies, provide recreational and active travel opportunities, and contribute to climate adaptation, flood resilience, and food system resilience, treating these corridors as essential infrastructure.

Chapter 13 Protecting Green Belt Land

The unambiguous protection of Green Belt land is essential to England and parts of the Kent Weald, where it operates alongside National Landscape designation to prevent settlement coalescence, preserve historic separation, and maintain landscape legibility. In this context, Green Belt performs a critical spatial function beyond containing large urban areas: it checks unrestricted sprawl, prevents the merging of towns, safeguards countryside from encroachment, preserves the setting of historic towns, and assists regeneration by encouraging urban focus.

WKPS Formal Response to December 2025 NPPF Proposal Consultation

Assessment of Green Belt land must be landscape led, settlement led, and evidence led, recognising that apparent low quality land may still be indispensable to the strategic functions of the Green Belt and to the conservation objectives of National Landscapes. Strategic Green Belt assessments should be integrated with detailed evidence on landscape character, historic pattern, infrastructure capacity, and cumulative impact to avoid inappropriate releases or erosion of strategic purposes.

Recommendation: Ensure that Green Belt policy continues to operate as a robust mechanism against coalescence and incremental settlement expansion in the Kent Weald, and that any consideration of grey belt land fully accounts for the five statutory Green Belt purposes, settlement separation, historic landscape function, National Landscape protections, and cumulative impact, with strategic assessments informing local plan policies rather than defaulting to simplistic criteria.

Chapter 14 Achieving Well Designed Places

High quality design in the Kent Weald cannot be achieved through standardised design codes or nationally uniform pattern books. The character of the Weald derives from local vernacular traditions including timber framing, varied rooflines, handmade brick, clay tiles, irregular plot structure, and the relationship between buildings and landscape.

Clearer national design expectations may strengthen the ability of local authorities to resist poor quality or formulaic development at appeal. A more explicit emphasis on design codes could improve consistency, reduce subjectivity, and provide greater certainty to both communities and applicants. Where national guidance reinforces locally derived codes rather than substituting for them, it has the potential to elevate overall design quality. The essential requirement is that such guidance enables local specificity rather than imposing uniformity.

Design harm in this context is frequently incremental. Repeated approvals of schemes that are individually acceptable but collectively erode scale, grain, and material coherence can result in profound character loss over time. Design policy must therefore operate at settlement and landscape scale, not solely at site scale. A number of Neighbourhood Plans in the Kent Weald, including Tenterden, already establish robust, locally derived design codes that are evidence led, demonstrating how vernacular form, materials, and layout can be codified while preserving settlement character and landscape integrity.

National design expectations must allow and require local specificity, enabling local plans and neighbourhood plans to mandate vernacular form, materials, and layout where justified by character evidence. Any consideration of expansion, including the assessment of grey belt land, must fully account for settlement separation, historic landscape function, and cumulative impact, ensuring that development does not undermine the fine grain settlement pattern or historic coherence of the Weald.

Recommendations

Apply DP1 and DP3 to require development in the Kent Weald and England as a whole to:

- a) Demonstrably reflect local vernacular, settlement grain, and landscape setting,
- b) Allow locally derived design requirements to exceed national baselines where supported by evidence, and
- c) Ensure that expansion, including grey belt land, fully respects settlement separation, historic landscape function, and cumulative impact.

Chapter 15 Promoting Sustainable Transport

National planning proposals suggest a stronger presumption in favour of housing development near railway stations. In principle, concentrating development in accessible locations can support modal shift, reduce long distance car commuting, and promote more sustainable patterns of growth.

WKPS Formal Response to December 2025 NPPF Proposal Consultation

However, in rural or small scale settlements, station proximity alone does not automatically translate into reduced car dependency. Many daily trips, including journeys to schools, local shops, healthcare facilities, and nearby employment, continue to rely on private vehicles. Minor roads, local junctions, and constrained transport networks may not be able to absorb additional traffic safely, even where rail access exists.

Cumulative effects of multiple small and medium scale developments can exacerbate congestion, reduce amenity, and erode the character and identity of settlements. Where local infrastructure and public transport capacity are limited, a blanket presumption favouring station based development risks adding vehicles to constrained networks rather than achieving meaningful modal shift.

It is suggested that planning policy should therefore differentiate between:

- Urban or well connected nodes capable of supporting higher density, predominantly car light development; and
- Rural stations or smaller settlements where local roads, junctions, and service provision constrain safe and sustainable intensification.

Where applied in rural contexts, the presumption should be conditional on the capacity of local transport networks, sustainable last mile connectivity, and the broader cumulative impact of development. This ensures that station led growth supports genuine sustainable transport outcomes rather than inadvertently increasing car dependency or infrastructure strain.

Recommendations

- a) Conditional presumption around stations: Include language making the presumption in favour of development near rail stations explicitly conditional on evidence that local transport networks, road capacity, and public transport frequency can safely accommodate additional growth.
- b) Rural differentiation: Require plan makers to distinguish between settlements where rail connectivity can genuinely support higher density growth and those where transport or infrastructure constraints make such growth unsustainable.
- c) Cumulative impact assessment: Encourage Local Plans to require cumulative traffic and transport impact assessment, ensuring multiple small or medium scale developments do not overwhelm local roads or reduce settlement amenity.
- d) Last mile connectivity: Highlight the importance of linking housing development to safe, accessible walking, cycling, and public transport routes between dwellings and stations, recognising that station proximity alone does not guarantee modal shift.
- e) Settlement character and amenity protection: Ensure that transport-focused development policies consider the wider effects on settlement form, heritage, and local environment, preventing incremental erosion of identity or amenity due to increased traffic or infrastructure pressure.

Chapter 16 Promoting Healthy Communities

Health and wellbeing in the Kent Weald are closely linked to access to open countryside, woodlands, dark skies, tranquillity, and historic landscapes. These assets support physical activity, mental health, social cohesion, and community resilience, particularly for older populations and those with limited mobility.

The Covid pandemic demonstrated the essential role of nearby countryside and quiet environments in supporting mental and physical health during periods of restricted movement. Communities with direct access to high quality local landscapes were better able to maintain wellbeing, while loss of tranquillity or environmental quality was acutely felt. This experience underlines that such assets are not optional amenities but core components of public health resilience.

WKPS Formal Response to December 2025 NPPF Proposal Consultation

Incremental loss of tranquillity through increased traffic, lighting, noise, and landscape fragmentation progressively undermines these benefits. These impacts are rarely captured through individual planning applications, yet they accumulate over time and are experienced directly at community level. **Recommendation:** Ensure that healthy communities policy explicitly protects access to countryside, tranquillity, dark skies, and environmental quality in rural settlements, recognising these as essential infrastructure for long term wellbeing, public health resilience, and community cohesion rather than residual amenities.

Chapter 17 Pollution, Public Protection and Security

Noise, light, air, and land contamination impacts are magnified in rural environments where baseline conditions are low. Even modest increases can significantly alter living conditions and ecological balance. In the Weald, cumulative pollution effects from traffic growth, external lighting, and inappropriate land uses pose a serious threat to tranquillity and habitat integrity.

Ground conditions are also a concern, particularly where historic or illegal waste activity has occurred.

Recommendation: Apply P1 and P2 to require cumulative impact assessment for pollution in rural settlements and sensitive habitats, and to ensure that contaminated or degraded land is fully remediated before development is permitted.

Chapter 18 Managing Flood Risk and Coastal Change

The clay soils, floodplains, streams, and undeveloped valleys of the Kent Weald perform essential natural flood management functions. These systems attenuate flows, support groundwater recharge, and reduce downstream flood risk.

Development that encroaches on floodplains, culverts watercourses, or increases surface runoff undermines these functions and transfers risk elsewhere. Climate change intensifies this concern, making precautionary approaches essential.

Recommendation: Apply F1 and F8 to safeguard floodplains, avoid culverting, and prevent development in locations where flood risk has been identified or would be exacerbated, recognising the strategic flood management role of undeveloped land in the Weald.

Chapter 19 Conserving and Enhancing the Natural Environment

The ecological value of the Kent Weald lies not only in designated sites, but in its network of hedgerows, veteran trees, small woodlands, streams, ponds, and historic field patterns. Together, these features provide ecological connectivity, climate resilience, and landscape character, forming an integrated environmental system that is fundamental to the area's sustainability.

Environmental harm in the Kent Weald is frequently incremental and cumulative, arising from repeated small losses that individually appear minor but collectively result in significant degradation. Recent National Planning Policy Framework proposals, including the 0.2 hectare exemption from Biodiversity Net Gain, seek to reduce burdens on very small sites and improve deliverability. Industry commentary recognises the exemption as a pragmatic step for smaller developers, though it also highlights risks, including the potential loss of high value habitats on small parcels, cumulative effects across multiple sites, and impacts on the off-site BNG market.

While the simplification is welcome, Biodiversity Net Gain must not be used to justify avoidable harm, nor to substitute for the proper application of the mitigation hierarchy. Avoidance and minimisation of harm must remain the primary objectives, with compensation considered only where impacts are genuinely unavoidable.

WKPS Formal Response to December 2025 NPPF Proposal Consultation

Recommendations:

- a) Provide clear guidance on how local planning authorities should apply the 0.2 hectare exemption.
- b) Recognise that while individual sites are small, cumulative effects may be locally significant; monitoring should therefore operate at settlement or local plan scale, not only nationally.
- c) Explicitly recognise cumulative biodiversity loss as a material planning consideration within the National Planning Policy Framework.
- d) Maintain a continued expectation that exempt sites should avoid harm to high value habitats.
- e) Ensure clarity that exemptions do not override protections for designated sites or priority habitats.
- f) Embed cumulative impact assessment explicitly within both plan making and decision making, and require that non-designated countryside features are consistently recognised and afforded material weight as integral components of biodiversity, landscape character, and sustainable development.

Chapter 20 Conserving and Enhancing the Historic Environment

Heritage in the Kent Weald is fundamentally landscape based. The significance of heritage assets derives not only from their fabric but from their spatial relationships with settlements, routeways, farmsteads, historic field systems, and their wider landscape setting. Assessment limited to individual assets or sites is therefore insufficient to capture the full extent of significance in this context.

Incremental development can erode setting, views, approach routes, and historic coherence over time without triggering formal thresholds of harm when considered in isolation. Proportionate or simplified assessment that does not explicitly address cumulative and incremental change risks systematic underestimation of harm and failure to meet statutory duties to conserve significance.

Recommendation: Apply HE1 and HE2 to require landscape scale heritage assessment where appropriate, explicitly addressing cumulative and incremental change, and to prevent development that would erode historic character and significance over time, even where individual impacts appear limited.

Part 4 Annexes

Annex A Data Centres and Other Large Scale Infrastructure Uses

Data centres and other large, high intensity infrastructure are most appropriate in urban areas and on established industrial sites. These locations provide ready access to robust electricity and water networks, transport infrastructure capable of accommodating frequent heavy goods vehicle movements, and lower landscape and heritage sensitivity. Urban and industrial contexts allow for concentrated delivery of high energy and water demand, operational resilience, and appropriate servicing without causing disproportionate harm to communities or the environment.

In contrast, rural areas are highly unsuitable for these developments. The dispersed settlement pattern, narrow rural roads, constrained electricity and water infrastructure, and sensitive landscape and heritage assets make rural siting incompatible with the operational requirements of data centres. Introducing large scale, energy or water intensive infrastructure in such locations would create avoidable harm to landscape character, environmental quality, and local service reliability.

Recommendations

- a) Direct data centres and comparable infrastructure to urban areas or existing industrial sites where infrastructure capacity and transport accessibility are sufficient.
- b) Ensure planning assessments require demonstrable long term water, wastewater, and energy capacity before approval, avoiding reliance on temporary mitigation measures.

WKPS Formal Response to December 2025 NPPF Proposal Consultation

- c) Apply transport policies to prevent development dependent on frequent heavy goods vehicle servicing on narrow or sensitive rural roads.
- d) Apply landscape and biodiversity policies to refuse developments whose scale, massing, servicing, or enabling infrastructure would cause disproportionate or cumulative harm in rural and sensitive landscapes.

Annex B Viability and Standardised Inputs

Viability assessments increasingly risk being used as a mechanism to erode, defer, or renegotiate essential environmental, heritage, landscape, and infrastructure protections. In sensitive landscapes such as the Kent Weald, these protections are not discretionary enhancements but fundamental prerequisites for development acceptability.

Greater standardisation and transparency in viability methodology could improve consistency across authorities and reduce protracted disputes over assumptions. Clearer national inputs may assist inspectors and decision makers in identifying genuinely abnormal costs and distinguishing them from speculative land value expectations. Improved transparency has the potential to strengthen public confidence where assessments are robust and independently scrutinised. However, this benefit depends on environmental and infrastructure safeguards being treated as fixed parameters rather than negotiable variables.

Constraints in areas such as the Kent Weald arise directly from its location, character, and environmental sensitivity. They are not abnormal costs arising from site specific circumstances, but predictable and unavoidable consequences of development within a nationally significant historic landscape. Treating such constraints as variable inputs within viability appraisal can weaken plan led certainty, distort land value assumptions, and shift financial and delivery risk away from landowners and developers towards communities and public authorities.

Standardised viability inputs or benchmark land values that fail to reflect environmental limits, infrastructure fragility, delivery sequencing, or long term maintenance obligations create unrealistic assumptions of deliverability. This in turn places pressure on decision makers to compromise protections in order to reconcile schemes with theoretical viability models, rather than assessing viability against plan led requirements.

Annex B must therefore operate as a procedural tool for transparency and consistency, not as a mechanism to dilute locally justified policy requirements.

Recommendations

Ensure viability policy treats environmental, heritage, landscape, and infrastructure requirements as mandatory and non-negotiable by:

- a) Applying PM12 Certainty Regarding Development Contributions to confirm that essential mitigation and infrastructure provision cannot be reduced on viability grounds
- b) Applying PM13 Setting Local Standards to support locally justified requirements reflecting landscape sensitivity and infrastructure limits
- c) Applying PM15 Examining Local Plans to prevent plans being found sound where delivery depends on the dilution of environmental or heritage safeguards
- d) Applying DM6 Use of Planning Conditions and Obligations to secure mitigation and infrastructure as fixed components of development
- e) Environmental, heritage, landscape, and infrastructure protections must be treated as fixed inputs to viability assessment, not variables to be negotiated.

WKPS Formal Response to December 2025 NPPF Proposal Consultation

This approach ensures that viability assessments remain a procedural tool to support transparency, predictability, and plan-led compliance, while safeguarding the environmental, heritage, landscape, and infrastructure protections that are essential to sustainable development in the Kent Weald.

Annex C Reforming Site Thresholds and Preventing Incremental Harm

Threshold-based approaches to planning control create a significant risk of incremental harm in rural and historic landscapes. In the Kent Weald, multiple small or medium-scale developments can collectively generate greater cumulative impacts than a single large proposal, yet individually they are less likely to trigger comprehensive assessment. Thresholds are procedural tools and must never be treated as determinative of acceptability in sensitive locations.

The incremental erosion of settlement form through repeated applications below threshold levels undermines settlement identity, degrades landscape character, threatens heritage assets, intensifies pressure on ecological and environmental resources, increases traffic on unsuitable rural lanes, and places additional stress on constrained water and wastewater infrastructure. This form of “salami slicing” allows material harm to accrue without being properly assessed or mitigated, weakening plan-led spatial strategy.

National thresholds do not reflect the realities of dispersed settlements, historic market towns, or edge-of-settlement locations, where even limited growth can produce disproportionate cumulative effects. Without explicit safeguards, local planning authorities are constrained in their ability to address cumulative impacts at either the plan-making or decision-making stage.

Recommendations

Strengthen safeguards against cumulative harm from small and medium-scale development by:

- a) Plan evidence (PM8): Require settlement capacity assessments and cumulative impact analysis at the plan-making stage to ensure strategic oversight of small and medium-scale proposals.
- b) Land allocation (PM9): Prevent fragmented site selection that undermines plan-led spatial strategy and encourages inappropriate sequential development.
- c) Development proposals and information requirements (DM1, DM2): Require applicants to assess cumulative impacts beyond the red line of individual applications, including landscape, heritage, ecological, and infrastructure effects.
- d) Determination of development proposals (DM3): Empower authorities to assess multiple related, sequential, or geographically linked proposals as a single development for the purposes of impact assessment, mitigation, and planning contributions where cumulative harm is evident.
- e) Threshold safeguards: Confirm that national thresholds must not be relied upon to bypass cumulative impact assessment in rural villages, edge-of-settlement locations, or historic market towns. Thresholds are procedural, and acceptability must always be judged in context.
- f) Monitoring and oversight: Encourage authorities to maintain records of small and medium-scale development over time to identify cumulative effects and ensure plan-led mitigation measures are applied consistently.

This approach ensures that procedural thresholds do not compromise the protection of landscape, heritage, ecological, or infrastructure assets, and preserves the integrity and character of sensitive rural settlements while supporting sustainable growth.

Transition

The December 2025 NPPF proposes transitional arrangements intended to give revised national policy material weight from the date of publication, while allowing existing Local Plans and Neighbourhood

WKPS Formal Response to December 2025 NPPF Proposal Consultation

Plans to remain part of the statutory development plan until reviewed or replaced. This approach recognises the need for continuity, delivery, and legal certainty during a period of system change.

For these arrangements to function effectively, the Framework must clearly explain how immediate national policy weight interacts with adopted development plans of differing age, review status, and evidential robustness. Without such clarity, there is a risk of inconsistent decision making, increased appeals and legal challenge, and uncertainty for local authorities, communities, and applicants.

The revised Framework will carry material weight from day one, without displacing adopted plans. During transition, the weight afforded to existing policies should be assessed as a matter of planning judgement, by reference to their substance, the currency of their evidence base, and the extent of public testing through examination and consultation. Differences in wording, structure, or format alone should not be treated as inconsistency or justify reductions in weight. Any reduction should arise only where there is a clear and substantive conflict with revised national policy.

To support consistent application, the Framework should distinguish between different plan states that commonly exist at the point of transition.

These include:

- a) plans recently adopted or reviewed and confirmed as current
- b) plans recently adopted or reviewed but requiring targeted alignment with revised national policy
- c) plans that are out of date but subject to active review
- d) plans that are materially out of date and not under review

Neighbourhood Plans raise related but distinct considerations. Their weight depends on their review status and on conformity with the Local Plan that sits above them. Proportionate treatment is essential to maintain democratic legitimacy while enabling alignment with revised national policy.

Clear guidance to Inspectors and decision makers is required to ensure consistent interpretation. Without this, transitional arrangements risk being applied inconsistently, with adopted policies losing weight simply because they predate the revised Framework rather than because of substantive conflict.

Where transitional protections or bridging mechanisms are provided, they should be time limited and linked to demonstrable plan review progress. Without defined limits, such mechanisms risk prolonging uncertainty rather than supporting timely alignment with the revised Framework.

Recommendations

The transition section of the revised Framework should apply differentiated treatment reflecting the following plan statuses.

- a) Recently adopted or reviewed plans confirmed as current: Plans adopted or formally reviewed within the last 5 years and confirmed as current should normally retain full statutory weight for a defined safe harbour period of up to 30 months. During this period, policies should be treated as consistent with national policy unless a clear and substantive conflict is identified. Limited interpretative alignment in terminology or wording should be permitted where necessary to reflect the revised Framework, provided the spatial strategy, settlement hierarchy, and site allocations remain unchanged and no formal plan modification is implied.
- b) Recently adopted or reviewed plans requiring alignment: Where plans have been recently adopted or reviewed but require targeted alignment with revised national policy, full weight should normally continue to be given to policies supported by current evidence. A transitional bridge mechanism should enable focused alignment with the revised Framework while preserving the

WKPS Formal Response to December 2025 NPPF Proposal Consultation

integrity of the adopted plan, subject to demonstrable progress towards plan update or replacement through the statutory plan making process.

- c) Out of date plans under active review: Where plans are out of date but subject to an active and evidenced review, adopted policies should continue to attract significant weight, particularly those relating to spatial strategy, settlement hierarchy, allocations, and infrastructure delivery. Emerging policies may be afforded limited material weight where supported by evidence and consultation. Any transitional or safe harbour period should be linked to demonstrable review progress and should not fetter decision making discretion.
- d) Plans materially out of date and not under review: Where plans are materially out of date and no formal review has commenced, national policy should carry substantial material weight from the date of publication. Adopted policies should attract weight proportionate to their consistency with the revised Framework and the currency of their evidence base. Authorities should be expected, as a matter of national policy expectation, to commence plan review without delay.
- e) Neighbourhood Plans: Neighbourhood Plans made or reviewed within the last 5 years and in conformity with a current Local Plan should normally retain full weight during any applicable transitional or safe harbour period. Where updates are limited to terminology, thresholds, or procedural alignment, the Framework should support proportionate and simplified modification routes where legislation allows, without undermining democratic legitimacy. Neighbourhood Plans not reviewed within 5 years should continue to attract proportionate weight until conformity is confirmed.
- f) Decision making guidance: The Framework should provide explicit guidance to Inspectors and decision makers that the revised Framework is a material consideration from the date of publication, while reaffirming that Section 38 6 remains the statutory starting point. Differences in wording, structure, or format alone should not justify reducing the weight of adopted policies.
- g) Time limits and sunset provisions: Safe harbour and transitional bridge mechanisms should be explicitly time limited and linked to defined milestones in plan review or replacement. Where meaningful progress is not demonstrated, transitional protection should reduce automatically through policy guidance, ensuring the revised Framework takes full effect within a reasonable period while preserving decision making discretion.

