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NPPF 2026: A New Planning Landscape for Development

The Government publishes a fundamentally restructured National Planning Policy Framework

On 17 August 2026, the Government published a new National Planning Policy Framework (NPPF), replacing the December 2024 Framework and completing the major restructuring consulted on last year.

This is more than another amendment to national planning policy. The new NPPF separates national plan-making and decision-making policies and introduces a materially different framework for assessing development proposals.

The policies in the new Framework are material considerations which must be taken into account in decision-making from the day of publication. Local plans do not need to be updated before the new NPPF can influence the assessment of existing sites, live applications and future development opportunities.

For developers, investors and landowners, it is now important to reassess potential sites and existing opportunities / portfolios.

We set out below 10 key implications for development.

1. A stronger starting point for development within settlements

Policy S4 is one of the most consequential new provisions.

For proposals within settlements, Policy S4 provides that development should be approved unless the benefits would be substantially outweighed by adverse effects when assessed against the national decision-making policies.

The policy remains subject to important exceptions, including where a proposal would have a substantial adverse impact on certain allocated or safeguarded land or buildings, or would fail to comply with a national policy that expressly requires refusal. It is a positive starting point, but not an automatic permission.

In practice, this may strengthen the case for brownfield, commercial, residential, care and mixed-use development within established settlements, particularly where a restrictive development plan policy has previously been the principal obstacle.

2. Test older development plan policies against the new Framework

Annex A could be equally significant for live proposals.

Annex A states that development plan policies which are materially inconsistent with the new national decision-making policies should be given very limited weight, unless they have been examined and adopted or made against the new Framework.

A policy does not attract less weight simply because it is old. The key question is whether it is materially inconsistent with the new national decision-making policies.

Where a proposal conflicts with an employment, settlement, density or other development management policy, the assessment should therefore not end with the finding of conflict.

Applicants should also test whether the relevant development plan policy is materially consistent with the new national framework and, if not, what weight it should carry. That analysis is likely to become central to both applications and appeals.

3. New opportunities for brownfield land outside settlements

Policy S5 sets out the forms of development that should be approved outside settlements unless their benefits would be substantially outweighed by adverse effects, assessed against the national decision-making policies.

Importantly, these include the redevelopment of previously developed land.

For land outside the Green Belt and Local Green Space, this could materially improve the prospects of redundant industrial premises, commercial sites, depots, former institutions, petrol filling stations and other previously developed sites on settlement fringes or in freestanding locations.

Sites previously discounted principally because they fall beyond a settlement boundary now merit fresh appraisal, although all other relevant national decision-making policies will continue to apply.

4. Evidence of unmet need assumes greater importance

Policy S5 also establishes a route for development outside settlements that would address an evidenced unmet need, subject to detailed locational and infrastructure criteria.

A lack of five-year housing land supply and Housing Delivery Test performance below 75% are expressly identified, but the concept of evidenced unmet need is not limited to housing.

This creates a potential route for proposals that address specific accommodation or business needs, provided the need and locational case can be robustly evidenced.

For business land and premises, Policy E2 is especially relevant. It gives substantial weight to specified economic benefits and, when unmet need must be demonstrated, directs attention to market signals, the availability of suitable land and premises, and the specific locational requirements of the proposal.

For certain commercial proposals, success is therefore likely to depend on a clear, market-facing evidence base rather than a generic statement of need.

For proposals such as data centres and operator-specific retail development, clearly evidenced locational, market and operational requirements may strengthen the case on unmet need, although other relevant policy tests will still apply.

5. New opportunities around well-connected stations

The new Framework creates an important policy opportunity for residential and mixed-use development around well-connected stations.

Outside settlements, qualifying proposals can benefit from Policy S5 where they are within reasonable walking distance of a well-connected station, physically well-related to the station or settlement, of a scale that infrastructure can accommodate, and would not prejudice long-term comprehensive development.

For these policies, reasonable walking distance generally means around 800 metres, or around 10 minutes' walk where topography, route quality or physical barriers would discourage walking that distance.

Policy GB7 also treats qualifying residential or mixed-use development near a well-connected station as not inappropriate in the Green Belt, removing the need to demonstrate very special circumstances where all criteria are satisfied. Major development must also comply with the Golden Rules in Policy GB8.

This creates a new route for Green Belt sites near qualifying stations, but detailed site-specific assessment remains essential.

6. Green Belt sites warrant a fresh, site-specific review

The new NPPF retains strong protection for the Green Belt, but Policy GB7 identifies several routes that may support development without the need to demonstrate very special circumstances.

Depending on the site and proposal, the potential routes include:

- Long standing exceptions to inappropriateness, such as the redevelopment of previously developed land, which remain;
- Development on grey belt land where the unmet need and sustainability criteria are met;
- Qualifying station-related residential or mixed-use development; and
- Where none of those routes applies, the conventional very special circumstances case.

The grey belt provisions introduced in December 2024 have been retained. Separately, redevelopment of previously developed Green Belt land is not inappropriate where it would not cause substantial harm to openness. Each route has distinct tests, and the Golden Rules apply to major housing development.

7. Stronger emphasis on the effective use of land

Policy L2 gives substantial weight to the benefits of making better use of vacant or underutilised land and buildings.

Its commercially important examples expressly include underutilised retail and business sites, car parks, service yards, and space above shops and commercial premises.

For landowners and operators, retail parks, supermarkets, business estates and large surface car parks should increasingly be viewed not only as existing assets, but also as potential intensification or mixed-use opportunities.

Around well-connected stations, Policy L3 generally requires at least 35 dwellings per hectare, rising to at least 45 where the service frequency is at least twice the minimum for a qualifying station. Those minimums should be exceeded where possible.

8. Stronger support for housing and specialist accommodation

Policy HO7 requires substantial weight to be given to the benefits of providing homes that contribute to evidenced accommodation needs.

This should be read alongside Policy S5's wider route for development that addresses an evidenced unmet need.

Policy HO9 addresses living conditions, access to services and accessibility for specialist accommodation.

A robust sector needs case may therefore carry greater weight, especially at settlement edges.

9. A clearer national policy for roadside facilities

Policy TR5 brings roadside facilities into a dedicated national policy. For new or significantly expanded facilities, it requires evidence of a need to improve road-user safety and welfare, improve access to electric vehicle charging or alternative fuels, or address shortages in overnight lorry parking.

Policy S5 expressly recognises roadside facilities that accord with TR5 as a form of development that can be supported outside settlements. This gives the sector a clearer framework for addressing the inherent locational requirements of uses that serve the road network.

For developers and operators, the practical advantage is greater policy clarity rather than an unrestricted route to consent: proposals will remain evidence-led and subject to the other relevant national decision-making policies.

TR5 also protects existing roadside facilities by requiring suitable replacement provision with good access to the strategic transport network, or evidence that a facility is no longer needed or viable, before its loss is supported.

10. A more supportive framework - but not a free pass

Several areas remain expressly restrictive.

Main town centre uses, including out-of-centre retail development, remain subject to the sequential test where the proposal is neither in an existing centre nor in accordance with an allocation in an up-to-date development plan.

The loss of shops, public houses and other key community facilities also attracts specific protection. Where commercial viability is relied on to justify the loss of a shop or public house, the NPPF expects evidence that reasonable steps have been taken to market the property for its existing use, without success, for at least 12 months.

Hot food takeaways face a direct national restriction. Proposals should be refused within reasonable walking distance of schools and other places where children and young people congregate, unless the site is within a designated town centre. For this purpose, reasonable walking distance generally means around 400 metres, or around five minutes' walk where the walking environment justifies a shorter distance.

What should developers, investors and landowners do now?

The immediate opportunity lies in reassessing live applications and appeals, prospective acquisitions and existing portfolios against the new policies.

Particular attention should be given to sites previously discounted because of settlement boundaries, Green Belt constraints or conflict with older development plan policies.

An early review should identify where the new national policies strengthen the development case, where additional evidence will be required and where constraints remain decisive.

Rapleys can provide site-specific appraisals, portfolio reviews and advice on the implications for live applications and appeals.

Please contact us to discuss how the new Framework may affect your sites or development strategy.

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