



Council name	COTSWOLD DISTRICT COUNCIL
Name and date of Committee	PLANNING AND LICENCING COMMITTEE - 11 FEBRUARY 2026
Subject	PROPOSED REFORMS TO THE NATIONAL PLANNING POLICY FRAMEWORK (NPPF) AND OTHER CHANGES TO THE PLANNING SYSTEM
Wards affected	All
Accountable member	Councillor Juliet Layton Deputy Leader of Cotswold District Council and Cabinet Member for Housing and Planning Email: Juliet.Layton@cotswold.gov.uk
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Summary/Purpose	To advise Planning and Licensing Committee of the current NPPF consultation, agree the consultation response on behalf of the Council and to seek delegated authority to respond to a second consultation on Design and Placemaking guidance.
Annexes:	Annex A: CDC Responses to Consultation Questions
Recommendation(s)	That the Planning and Licencing Committee resolves to: <ol style="list-style-type: none">1. Grant delegated authority to the Director of Communities and Place to make the final submission of comments on the consultation, having regard to further comments made by the committee at and after the meeting and in consultation with the Cabinet Member for Housing and Planning, and2. Grant delegated authority to the Director of Communities and Place in consultation with the Cabinet Member for Housing and Planning to submit comments on recent consultation on Design and Placemaking Planning Practice



COTSWOLD

District Council

	Guidance – Public Consultation
Corporate Priorities	(Select which ones apply from the list below) <ul style="list-style-type: none">• Delivering Good Services• Responding to the Climate Emergency• Delivering Housing• Supporting Communities• Supporting the Economy
Key Decision	NO
Exempt	NO
Consultees/ Consultation	



1. EXECUTIVE SUMMARY

- 1.1** The Planning and Licensing Committee's views are sought on the draft responses to the new NPPF consultation attached to this report.

2. BACKGROUND

- 2.1** The Government published a new draft National Planning Policy Framework (NPPF or "the Framework") on 16 December, which is open for consultation until 10 March 2026. The draft represents a substantial change to and expansion of the existing Framework, increasing its length from 69 pages to 100 pages, supported by a further 25 pages of annexes.
- 2.2** The document introduces a significant restructuring of the Framework. Instead of the current format of consecutively numbered paragraphs, the draft is arranged into thematic chapters, each containing separate plan-making policies and decision-making policies. The latter replaces what were previously termed national development management policies. Policies are now presented as numbered policy statements, mirroring the format commonly used in local plans. According to the consultation, this revised structure is intended to improve clarity and ease of reference.
- 2.3** The Government has also indicated that a final new version of the NPPF is expected to be published around early summer 2026.
- 2.4** The purpose of this report is to provide an overview of the proposed changes and, where possible, to highlight the potential implications for Cotswold District.

3. MAIN POINTS

- 3.1** The following provides a summary of the National Planning Policy Framework consultation proposals. It does not provide an exhaustive list of every proposal and instead focusses on the issues that are most important to Cotswold District.
- 3.2** In summary, the consultation proposals include:

THE LOCAL PLAN



- i. **Transitional arrangements** – The consultation proposes that plans being examined under the current system can continue to be examined under the NPPF (December 2024). However, nationally set development management policies will be implementable at the point of publication of the revised NPPF, and where there is a conflict with the adopted local plan, take precedence and that that *"development plan policies should be afforded very little weight where inconsistency arises, except where they have been examined and adopted against the new Framework"*.
- ii. **Timing of the NPPF consultation** – The timing of the NPPF consultation is unfortunate. The consultation ends on 10th March 2026 and is expected to be implemented in summer 2026. The timetable for delivering the Council's Local Plan includes a consultation on the pre-submission draft Local Plan (formally known as a Regulation 19 consultation) in summer 2026. This date is improvable in order to hit government's immovable deadline to submit Local Plans for examination under the current planning regulations by December 2026. This means the Council may have little time to adapt its Local Plan policies to the updated NPPF, but consideration will be given to incorporating the draft policies to minimise conflict in the future.
- iii. **December 2026 Local Plan submission date confirmed** – The government has confirmed that all plans being examined under the current planning regulations must be submitted to the Secretary of State for examination by December 2026.
- iv. **Spatial Development Strategies (SDS)** – Proposed Policy PM1 establishes a new framework for strategic planning, requiring strategic planning authorities to prepare an SDS. These strategies are intended to articulate a clear, forward-looking vision for growth and change across wider sub-regional areas, focusing on genuinely strategic matters while leaving more detailed policy considerations to other components of the development plan. SDSs must outline a long-term approach to achieving sustainable growth over a minimum 20-year period, including distributing objectively assessed housing and other development needs among the local planning authorities within the strategy area.

PLANNING APPLICATION DETERMINATION

- v. **National Development Management Policies (NDMPs)** – The draft NPPF includes a suite of NDMPs. Although the Government has indicated that the new



NDMPs are intended to be nonstatutory, the consultation confirms that this position is still “under review”. Importantly, even in a nonstatutory form, the NDMPs would still constitute a material consideration in the determination of planning applications – the same situation as existing NPPF policies.

- vi. **Conflict with adopted Local Plan policies** – Once the NPPF comes into effect, any adopted Local Plan policies that conflict in any way with the NDMPs set out in the NPPF will carry only very limited weight in planning decisions.
- vii. **Development in settlements** – Within settlements, planning applications would be approved “unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework”. Examples of adverse impacts include where a scheme would undermine land is designated or protected for specific purposes in the Local Plan, or where it would breach key safeguarding policies. However, no definition is given to what constitutes a settlement or land ‘within’ it (e.g. size of the settlement), which is extremely problematic in terms of the proposals potentially opening the door to development in rural locations with limited access to services, facilities, employment, etc., and the resultant reliance on private car use and increased CO2 emissions.
- viii. **Development outside settlement** – Policy S5 sets out the limited circumstances in which development may be supported outside settlements, allowing only specified types – such as agriculture, rural enterprise, reuse of permanent buildings, redevelopment of brownfield land, limited infilling, rural exception sites, traveller accommodation, well located housing near highly connected railway stations, and allocated sites or proposals meeting unmet needs – while requiring all such schemes to be approved only where their benefits are not substantially outweighed by adverse impacts when assessed against the national decision making policies in the NPPF.
- ix. **New titled balance** – A revised approach to decision making for development outside settlements is proposed. Unless the benefits granting permission would substantially outweigh any adverse effects (when assessed against the NPPF’s decision-making policies) proposals for housing should be approved where they:



- are situated within walking distance of well-connected railway stations (note, currently neither Kemble or Moreton-in-Marsh meet the requirements to be classified as a well-connected railway station);
- meet a proven unmet need – such as where a five year housing land supply cannot be demonstrated or where the most recent Housing Delivery Test score is below 75% – provided the site relates well to an existing settlement and the scale of development proposed can be accommodated taking into account the existing or proposed availability of infrastructure; involves the redevelopment of previously developed land; or
- are an exception site, involve development brought forward under a Community Right to Build Order or Neighbourhood Development Order.

4. CONSULTATION RESPONSE

- 4.1** A NPPF consultation response will be prepared and submitted to the Government before the 10th March 2026 deadline, along with an accompanying letter highlighting key issues of importance.
- 4.2** With regard to the Design and Placemaking Planning Practice Guidance – Public Consultation [Design and Placemaking Planning Practice Guidance: consultation document - GOV.UK](#), a consultation response will be submitted by 10th March 2026, also with an accompanying letter highlighting the Council's key issues.

5. FINANCIAL IMPLICATIONS

- 5.1** There are no direct financial implications arising from this report or from the submission of the Council's consultation responses to the draft National Planning Policy Framework and the Design and Placemaking Planning Practice Guidance. Preparing and submitting the responses will be delivered within existing staff resources and approved budgets.
- 5.2** The proposed changes to the National Planning Policy Framework and related guidance could lead to future resource pressures and associated financial implications. The scale of reform, including new national policies, the introduction of Spatial Development Strategies, and the need to ensure Local Plan alignment, is expected to



place additional demands on planning services over time and will need to be kept under review.

6. LEGAL IMPLICATIONS

- 6.1** The consultation and response itself has no legal implications, however legal advice to support departmental officers may be required in respect of plan making and decision making once the new NPPF takes effect.

7. RISK ASSESSMENT

- 7.1** The risk to the Council lies in not making its views known to the Government if a consultation response is not submitted.

8. EQUALITIES IMPACT

- 8.1** Not applicable

9. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

- 9.1** Not applicable at this stage.

END