

## **CCS comments on draft NPPF February 2026 – as submitted**

Numbers relate to the questions in [Proposed reforms to the National Planning Policy Framework and other changes to the planning system - Ministry of Housing, Communities and Local Government - Citizen Space](#)

### **Question 6 (Spatial development strategies)**

As far we can see, the formal position is unchanged as regards consultation by the local planning authority with bodies like ours in making plans. However, there does not seem to be any arrangement for the civic society movement and others to have a right to be heard in the preparation of the spatial development plans. As these higher-level plans will play a central role in shaping local plans, such as the local plan for Cheltenham, we think public consultation should be a statutory requirement in their preparation. Involvement in plan making is particularly important since in practice it will be harder to object to specific proposals without reference to an approved plan, design guidance / code, conservation policy. As these are likely to be delayed, effective objection, especially against housing, will be more difficult.

### **Question 31 (New intentional unauthorised development)**

Our experience has been that quite often development has gone ahead without the necessary approvals, and very often building works have begun before the planning process is complete. In at least one case, affecting a Grade II Listed Building, the development was not only unauthorised but had been explicitly refused by the LPA; but no action was taken by the planning authority subsequently, despite urging by local residents. As a result, the system is undermined and brought into disrepute. We therefore strongly support the action proposed in the revised NPPF as a disincentive to transgressions of this nature.

### **Question 88 (Town centres)**

We warmly welcome plans to encourage the role that design guides, codes, masterplans and Article 4 directions can play in shaping town centres. Their use will enable LPAs to adopt and promote planning policies adapted to the needs of particular town centres.

Specifically, the NPPF should encourage every town to prepare a plan for its town centre in view of the unique concentration of issues that arise there.

We are keen to see planning policies linked to two areas that affect the success of town centres:

- town centre governance: the government should encourage the establishment of broad-based, town centre forums to bring together the range of commercial, civic and official interests who need to be involved in the management of the town centre.
- the need for a high-quality public realm. You can have all the private investment you like, but if the pavements are neglected or graffiti and litter are left unaddressed, the economic success of the centre will be jeopardised; conversely, a high quality public realm attracts private investment, creates a sense of 'pride in place' and acts as an economic multiplier. While the responsibility for execution lies with highway authorities and others, town centre plans should set high standards.

### **Question 121 Housing densities**

Although it is not clear how widely it is intended to apply this policy, we should support the intention of raising housing densities as a general policy. We have had experience in Cheltenham with an important site near the town centre which could, in our view, have been developed at a significantly higher density than that favoured by the LPA. Provided such development is supported by infrastructure and is well designed we support policies to increase densities in new residential development. However, LPAs need to have sufficient urban design capacity to produce codes and policies, negotiate with developers, and be able to require developer contributions upfront; otherwise, the strong presumption in favour of housing volume and density targets can overwhelm design quality.

The new NPPF encourages the development of small and medium sized sites, a measure we support, but it will be difficult for LPA's to produce planning guidance or engage with developers on every single small site. So, the final version of the NPPF should encourage LPA's to consider preparing design and other guidance that promotes high-quality development on smaller sites as well larger ones.

The new guidance is also likely to allow cash contributions in lieu of affordable housing development. There must be transparency about where these monies go and more encouragement given to partnership working, so as to encourage sustainably built, affordable housing of high-quality design. MHCLG should disseminate examples of best practice.

### **Question 189 Impact on historic assets**

We favour the simplified hierarchy of harm (positive effect, harm, substantial harm, or total loss of its significance) and the removal of the confusing phrase "less than substantial harm".

### **Question 191 Any other thoughts re the historic environment ?**

There are several things to welcome here:

- The stronger emphasis on the economic value that heritage buildings can play in regeneration of economics.
- The requirement that plans for conservation areas be reviewed periodically, and new or amended designations should be accompanied by an adopted appraisal and management plan.
- The encouragement given to the preparation of design guides for conservation areas.

However, in practice safeguarding heritage may be more difficult because of the strong emphasis on delivery, especially of housing, the failure to address the impact of cumulative change and the lack of LPA conservation expertise and capacity.

### **Question 193 – any other comments?**

The RTPI have commented that the Government’s intention to release £8 million in funding for development management services is welcome, but it has cautioned that without clear ring-fencing and long-term commitment, its impact may be limited.

We support that view. This level of additional financing would probably fund 80-100 planners, or 0.25 planners per local planning authority (LPA). As LPAs are being asked to do more, faster without matching resource increases, particularly in staff, it is likely that plans, design codes etc will be delayed and decisions will default to the NPPF. That said, investment by LPAs in more ‘strategic’ planning, such as planning guidance and design codes, could mean more efficiencies in the development control process, as well as higher quality outcomes. While additional staff would be welcome, resources are not the only limiting factor.

#### **Q31:**

“...As a result the system is brought into disrepute. If the action proposed in the revised NPPF were to be put in place, we don’t think this would happen.”

#### **Q88:**

“the need for a high quality public realm. You can have all the private investment you like, if the pavements are neglected or graffiti and litter are left unaddressed, the economic success of the centre will be jeopardised. While the responsibility for execution lies with highway authorities and others, town centre plans should set high standards.”

CHANGE TO:

“the need for a high quality public realm. You can have all the private investment you like, if the pavements are neglected or graffiti and litter are left unaddressed, the economic success of the centre will be jeopardised and, conversely, a high-quality public realm attracts private investment, creates a ‘pride in place’ effect, and acts as an economic multiplier. While the responsibility for execution lies with highway authorities and others, town centre plans should set high standards.”