

Aldersgate Gate Group response to proposed reforms to the National Planning Policy Framework and other changes to the planning system

March 2026

Background

The Aldersgate Group is an alliance of major businesses, academic institutions, professional institutes and civil society organisations driving action for a sustainable and competitive economy. Our corporate members believe that ambitious and stable net zero and nature-positive policies make clear economic sense for the UK. Our members have operations across the UK economy and include companies such as Associated British Ports, Wilmott Dixon, Turley, Turner & Townsend, National Grid, Suez, Scottish Power, and Siemens Energy.

We develop independent policy solutions based on research and the expertise and diversity of our members. Through our broad membership, we advocate change that delivers benefits to an every-growing spectrum of the economy. The response to this consultation draws on previous Aldersgate Group responses and input from members.

Planning Policy

Aldersgate Group has engaged on planning policy consistently with several briefings in the past few years. It is an important policy field for the furtherance of sustainable development, industrial and electrical system decarbonisation, and land use change. We believe in successive government's instinct to pursue planning system reforms to achieve the UK's Climate Change Act and Environment Act targets.

In 2024 we published [Electric Dreams: how the planning system can help deliver the UK's low-carbon energy](#) in collaboration with CPRE and RenewableUK. Therein, we made recommendations on comprehensive decarbonisation plans for the power system, community engagement with new renewable infrastructure rollout, and the development of the Strategic Spatial Energy Plan to front-load considerations of the natural environment.

In 2025, we published the briefing [Making the Nature Restoration Fund Work for Business and the Environment](#), in response to the Planning and Infrastructure Bill nearing royal assent. In this policy focussed briefing, we urged the government to provide confidence to businesses navigating the new planning reforms, argued for constrained use of EDPs to ecologically sound applications, asked for clarity on the role of nature markets in the NRF and advocated for a comprehensive digital infrastructure to help the NRF succeed.

We are pleased with the reception of our views on both publications and continue to be a critical friend and sounding board to the government when implementing policies that can be politically challenging. We hope to exercise the view that businesses are on the side of the climate and nature agenda and can lend expertise and support the government in policy design and implementation.

It is in this spirit that we contribute a response to the [NPPF consultation](#) published in December 2025.

Questions

Chapter 5: Meeting the challenge of climate change

Climate change presents an urgent and far-reaching challenge, with wide-ranging implications for communities, ecosystems, and the economy. The planning system has a vital role to play in reducing emissions and building resilience to its impacts. Recognising this, core policies on addressing climate change are proposed to be brought forward in the Framework, with the policies themselves setting out more comprehensively how planning policies and decisions can make a positive contribution. Policies on flood risk and energy are proposed to be addressed in separate chapters to ensure these topics receive appropriate coverage.

The policies aim to ensure that both climate change mitigation and adaptation are appropriately considered in both plan-making and decision-making. Given the crosscutting nature of climate issues, the policies signpost to other relevant chapters, such as those on design and sustainable transport, where appropriate, to ensure a holistic approach is taken.

Aldersgate Group High Level Chapter Response

- The Aldersgate Group broadly welcomes the decision to consolidate climate change policies under the NPPF into a dedicated chapter. This should provide a stronger foundation for plan-making and decision making nationally that fully reflects climate objectives. In particular, we hope it creates an opportunity for the NPPF to progressively integrate nature-based solutions, green infrastructure, and national carbon stock considerations within planning policy.

Plan-making policy

CC1: Planning for Climate Change

This policy consolidates and redrafts paragraphs 161, 162, and 164 of the current Framework to provide a clearer and more cohesive set of plan-making principles. The policy sets out how development plans should contribute to mitigating climate change and address climate-related risks.

The list of climate risks identified is illustrative rather than exhaustive and now includes wildfires to reflect their increased likelihood.

The policy highlights the role of baseline carbon assessments as tools that can be used to assess the potential impact of spatial strategies and allocations on future emissions and options for mitigation. It also sets out measures that may be needed to address current or future vulnerabilities and encourages opportunities to incorporate green infrastructure and nature-based solutions.

42) Do you agree with the approach to planning for climate change in policy CC1? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

- Partly agree.

a) Please provide your reasons, particularly if you disagree.

- Policy CC1 is broadly in line with the views of Aldersgate Group’s membership. We welcome the explicit inclusion of baseline carbon assessments as a plan-making tool, as well as the requirement to incorporate green infrastructure and nature-based solutions. Embedding climate resilience into spatial strategies is crucial and these are important steps towards that. Embedding climate resilience within spatial strategies is essential, and these provisions represent important progress towards that objective.
- CC1 could go further. We encourage the government to make climate risk assessments mandatory rather than discretionary, for plans above a certain scale. The illustrative list of climate risks should be reviewed periodically to reflect updated climate projections. CC1 should also make explicit reference to alignment with Local Nature Recovery Strategies, given their relevance to green infrastructure planning, the Nature Restoration Fund and nature/carbon sequestration market formation.

National decision-making policies

CC2: Mitigation of Climate Change

This policy would replace paragraph 163 of the current Framework and establishes a more comprehensive approach to assessing climate mitigation in planning decisions. It adopts a signposting approach by cross-referencing relevant policies elsewhere in the Framework, and draws on existing paragraphs 161, 166, and 167, as well as other parts of the current Framework.

The policy sets out key considerations for decision-making, including:

- Promoting sustainable transport and development patterns;
- Encouraging design approaches that conserve energy and other resources;
- Supporting opportunities to reuse existing structures and materials;
- Protecting and restoring habitats which can act as important carbon stores; and
- Restricting fossil fuel extraction.

The policy would also give substantial weight to the benefits of improving the energy efficiency of existing buildings or drawing energy from district heat networks, and renewable and low-carbon sources.

43) Do you agree with the approach to mitigating climate change through planning decisions in policy CC2? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

- Partly disagree

a) If not, what additional measures could be taken to ensure climate change mitigation is given appropriate consideration?

- The more comprehensive approach of CC2 is welcome. The explicit inclusion of habitat protection and restoration as carbon stores is a positive and progressive step, and the substantial weight given to energy efficiency improvements and low-carbon energy should help provide clear direction for the decarbonisation of the built environment. These are important signals for the businesses we work with, many of whom have been seeking greater planning certainty to support low-carbon investment.

- However, if the proposals in PM13 proceed to restrict the ability of local authorities to set higher energy efficiency standards, the effectiveness of CC2 may be limited. This highlights a tension between the ambition set out in CC2 and the proposed standardisation of local energy standards; creating a risk that a key lever for driving decarbonisation of the built environment at the local level is weakened. We therefore urge the government to ensure policy coherence and maintain ambition to support decarbonisation. We draw Ministers' attention to the [open letter from businesses, local authorities and NGOs calling for PM13 to be revised](#) to avoid incoherence between national policy and implementation. Energy-efficient homes represent a clear win for both the climate and households, helping to reduce emissions while also lowering energy bills and supporting efforts to address the cost of living.
- Aldersgate Group would welcome greater ambition to use the planning system to drive the uptake of lower-carbon construction products and increased circularity in the built environment. For example, under the London Plan (2021) the Greater London Authority (GLA) requires Whole Life Carbon (WLC) assessments and Circular Economy Statements for large or strategically significant developments that are referable to the Mayor. These requirements help ensure that the carbon impacts of materials and construction are considered early in the design process and encourage greater reuse, material efficiency and the uptake of lower-carbon products. We would welcome more explicit support within the NPPF for assessing and reducing whole-life carbon and embedding circular economy principles in development proposals through the planning system. Strengthening the policy framework in this way would be an important step towards making development more sustainable while also stimulating demand for low-carbon industrial products and circular economy solutions, supporting UK supply chains and the creation of new jobs and economic activity.¹

CC3: Adaptation to Climate Change

This policy would also replace paragraph 163 and sets out principles for climate adaptation in planning decisions. It goes further than the current Framework by requiring development proposals to consider both current and future climate impacts over the lifetime of the development. As with policy CC2, this policy establishes clear criteria that developments should meet to address key climate risks, linking to other national decision-making policies where appropriate, and providing a more consistent framework for decision-making. Sub-paragraph (e) of the policy highlights the particular importance of considering wildfire risks, due to the increasing prevalence of spells of hot and dry weather, and of changing vegetation patterns. It indicates when risks should be considered and outlines potential mitigation measures which may be appropriate. We welcome views on how such risks are identified and how mitigation measures can be integrated with wider principles for good design and what guidance is needed to support this.

44) Do you agree with the approach to climate change adaptation through planning decisions in policy CC3? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

¹ Aldersgate Group (2026). [Powering up public procurement to drive industrial decarbonisation and competitiveness.](#)

- Partly agree.

a) What additional measures could be taken to ensure climate change adaptation is given appropriate consideration?

- Requiring development proposals to consider both the current and future impacts over the full lifetime of the development is a step in the right direction and is an improvement to the current framework. We further recommend that the policy be strengthened in two ways:
 - The criteria for assessing climate risk should be explicitly tied to recognised climate scenarios (such as [UKCP18 High End](#)) to ensure consistent application and considerate of CCC adaptation committee report and advice.
 - The policy should be clearer about how adaptation requirements interact with water quality and flood risk mitigation, given the new chapter on water infrastructure.
- Cross-referencing must be pursued between CC3, W4 and Chapter 18 to improve policy coherence.

45) Does the policy on wildfire adaptation clearly explain when such risks should be considered and how these risks should be mitigated? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

- Partly agree.

a) Please provide your reasons

- Aldersgate Group recognise the landmark inclusion of wildfire risk in the framework for the first time. However, further detailed guidance will be required for this policy to be implemented effectively in practice. In particular, it is not yet sufficiently clear when wildfire risk assessments should be conducted as part of a planning application, or what the standard of mitigation would be where risks are identified.
- We encourage the government to develop accompanying Planning Practice Guidance to map wildfire risk areas, set out assessment methodologies, and provide examples of appropriate mitigation. The role of nature-based solutions in creating wildfire buffer zones, delivering co-benefits for people, biodiversity and carbon sequestration, should be explored.

46) How should wildfire adaptation measures be integrated with wider principles for good design, and what additional guidance would be helpful?

- Wildfire adaptation measures should be integrated into design frameworks. Where appropriate, nature-based solutions should be promoted as the preferred approach, given the multiple co-benefits that they provide, including for biodiversity, drainage, urban cooling, amenity and wellbeing. Guidance should cross-reference provisions of Chapter 19 on the natural environment and biodiversity, ensuring wildfire resilience measures are aligned with wider environmental objectives.
- Green infrastructure measures that reduce wildfire risks include defensible space around buildings (zones 0-2), for example graduated vegetation, non-combustible planting and landscape buffers that reduce fuel continuity across sites. These

approaches can reduce fire spread while maintaining ecological value where designed appropriately.

47) Do you have any other comments on actions that could be taken through national planning policy to address climate change?

- We have four additional priorities:
 - 1) The Frameworks should explicitly require plan-makers to assess the carbon implications for spatial strategies as a whole. At present the focus on individual sites risks overlooking the cumulative emissions associated with planning decisions, including those arising from land use change, transport patterns and supporting infrastructure. Requiring strategic-level carbon assessment would help ensure that local plans support the transition to net zero and enable planners to identify and mitigate emissions across the development strategy, rather than only at the project level.
 - 2) The Framework should go further in supporting nature-based solutions as a mainstream mitigation and adaptation tool. Private investment mechanisms for nature are a focus for Defra, and planning policy is a key demand driver for building nature markets. Voluntary carbon markets and BNG would benefit.
 - 3) The government must consider carefully the interaction between the pro-development presumptions in this consultation, and the environmental safeguards they are presenting in Chapter 5, 10 and 19. Without sufficiently ambitious policy and effective implementation, the drive to accelerate housing delivery risks undermining climate, nature and resilience outcomes, creating long-term costs and complexities that are far more difficult to address once development has taken place.
 - 4) Furthermore, the lack of formal channels to value and invest in natural capital in government decision making across all departments has led to a policy gap in restoring nature and ecosystems. An explicit Environmental Net Gain policy is something that Aldersgate would hope to see included in future iterations of the NPPF. This would allow developers and LPAs to sufficiently mitigate or adapt climate change and restore the natural systems which protect communities from the impacts of climate change.

Chapter 10: Securing Clean Energy and Water

This new chapter is proposed in recognition of the importance of improving energy and water infrastructure. It brings together existing policies on renewable and low carbon energy with two new policies on planning for energy and water infrastructure, and decision-making on water infrastructure.

Aldersgate Group High Level Chapter Response

- We strongly welcome the inclusion of a dedicated chapter on energy and water infrastructure. The water policies in the new W4 are directly relevant to our policy work on water regulation, water quality and private investment in catchment management. Our responses focus on ensuring these policies

support long-term resilience and unlock the investment needed for nature-positive water management.

Plan-making policies

W1: Planning for Energy and Water

This policy requires development plans to reflect the capacity of, and future requirements for, energy and water infrastructure. It emphasises the need for early engagement between relevant plan-making authorities, utility providers, regulators and network operators to establish a clear understanding of energy supply, network capacity, water supply, drainage, and wastewater capacity. The aim is to make sure that potential constraints caused by current or future deficits in capacity are identified and addressed proactively at the plan-making stage. The policy also expects plans to make appropriate provision for new and upgraded infrastructure, and to include measures to avoid constraining the operation or expansion of water and electricity networks.

96) Do you agree with the approach to planning for energy and water infrastructure in policy W1? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

- Partly agree

a) Please provide your reasons, particularly if you disagree, what alternative approach would you suggest?

We strongly welcome the inclusion of a dedicated chapter on energy and water infrastructure. It will assist in ensuring the importance of achieving the government's targets for energy and water are embedded in planning policy and decision-making.

- It is important that development plans proactively engage with energy and water infrastructure constraints and opportunities. Early engagement between planning authorities, utility providers and regulators is welcome. However, we note that this is already widely recognised as standard best practice across the planning system.
- We welcome the clarification that Development Plans should be consistent with, and support the delivery of, the emerging Strategic Spatial Energy Plan (SSEP), the Centralised Strategic Network Plan (CSNP) and Regional Energy Strategic Plans (RESPs) once these are adopted. This approach should help ensure that Development Plans both enable the deployment of renewable and low-carbon energy generation and storage, as well as the delivery of electricity network infrastructure. It should also support utility providers, regulators and network operators in identifying opportunities for strategic investment in energy infrastructure needed to facilitate wider development and the transition to a net-zero energy system.
- W1 could go further in three respects:
 1. It should explicitly reference water quality and catchment-scale planning, not just supply and drainage capacity. Without this, there is a risk that developments which contribute to the deterioration of water bodies at the catchment scale could be permitted without appropriate measures in place to mitigate these impacts. Strengthening the Framework in this way would

help ensure that planning decisions better support the protection and improvement of water environments.

2. It should require plans to consider the cumulative impacts of growth on water stress. This is particularly important in areas already identified by the Environment Agency as Water Stressed.
3. W1 should encourage plans that identify opportunities for nature-based solutions to water management challenges. Upstream wetland restoration and natural flood management are effective and reap a multitude of co-benefits. Restoration of saltmarshes are an important coastal protection measure that works to defend coastal communities and provide important wildlife habitats.

W2: Securing Renewable and Low Carbon Energy and Electricity Network Infrastructure

This policy updates paragraph 165 of the current Framework. In addition to renewable and low-carbon energy development, the policy now refers to electricity network infrastructure. This is because this type of infrastructure is commonly developed as standalone projects and not necessarily always in association with renewable and low carbon projects. A definition of electricity network infrastructure is proposed for inclusion in the glossary to ensure consistent interpretation. The definition of renewable and low-carbon energy has also been updated.

The policy requires development plans to identify areas suitable for renewable and low carbon energy development and electricity network infrastructure, including future re-powering and life extensions. Identification is only required where it would help secure development for these uses.

97) Do you agree with the amendments to current Framework policy on planning for renewable and low-carbon energy development and electricity network infrastructure in policy W2? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

- Partly agree

a) Please provide your reasons, particularly if you disagree.

- We welcome the inclusion of electricity network infrastructure alongside renewable and low-carbon energy in W2. This better reflects the reality that grid upgrade and expansion is a critical bottleneck for clean energy deployment. The requirement to identify areas suitable for future repowering and life extensions is an improvement.
- The policy could be clearer that the identification of suitable areas for renewable energy should be integrated with environmental baseline assessments, mapping onto Local Nature Recovery Strategies for example. This would ensure that clean energy development does not conflict with priority areas for nature recovery or habitat creation and connectivity.
- We note that the definition of “renewable and low carbon energy” omits CCUS. This is a necessity for meeting industrial decarbonisation targets and Clean Power 2030. The definition should also include Long Duration Energy Storage (LDES) as an important source of energy storage alongside Batteries (BESS).

National decision-making policies

W3: Renewable and Low Carbon Energy Development and Electricity Network Infrastructure

This policy consolidates current Framework paragraphs 168 and 169 and introduces references to electricity network infrastructure. This is because this type of infrastructure is commonly developed as standalone projects and not necessarily always in association with renewable and low-carbon technologies.

The re-cast policy goes beyond the existing by indicating that substantial weight should be given to benefits for energy security, economic development and net zero, the additional benefits from re-powering, and the contribution that small-scale and community-led developments can make.

Additionally, the policy clarifies the need for decommissioning and site restoration for time-limited developments, recognising that most renewable and low-carbon energy schemes are permitted on a temporary basis.

Current Framework paragraph 169 is proposed to be modified, so that where these types of development come forward outside areas identified in the development plan, they should be assessed against the national decision-making policies as a whole, rather than the criteria used for identifying suitable areas in the development plan. This is to reduce any uncertainty about how this policy should be applied in practice, and to reflect the more comprehensive role that national decision-making policies are intended to play in assessing development.

98) Do you agree with the proposed approach to supporting development for renewable and low carbon development and electricity network infrastructure in policy W3? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

- Strongly agree

a) Please provide your reasons, particularly if you disagree, and any changes you would make to improve the policy.

- We strongly support the substantial weight given in W3 to the benefits of renewable energy for energy security, economic development and net zero. Small-scale generation can play an important role in supporting local decarbonisation and energy system resilience.
- We encourage the government to ensure that W3 operates in practice in a way that supports the timely delivery of nationally important clean energy infrastructure. We also recommend that W3 explicitly cross-reference decommissioning and restoration requirements with BNG obligations. This would ensure that end-of-life restoration delivers measurable environmental improvements rather than simply returning the land to its previous condition.

W4: Water Infrastructure

This new policy supports the delivery of water supply, drainage and wastewater infrastructure where it is not already covered by permitted development rights, and does not require approval through the Nationally Significant Infrastructure Projects regime. The policy gives substantial

weight to proposals that increase capacity to support planned development, strengthen the security of supply for existing users, improve water quality, and reduce water-borne pollution.

99) Do you agree with the proposed approach to supporting development for water infrastructure in policy W4? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

- Partly agree

a) Please provide your reasons, particularly if you disagree.

- Aldersgate Group members strongly support the inclusion of W4 as a new policy. It appropriately gives significant weight to proposals that increase capacity, strengthen supply security and improve water quality. Its inclusion is long overdue and meets the concerns raised by our business members, which we have outlined in [our recent water blog](#).
- However, this policy could be strengthened in several ways.
 - 1) It should explicitly support nature-based water infrastructure, such as constructed wetlands, floodplain restoration and catchment management schemes, alongside grey infrastructure. A mix of grey and green infrastructure can often deliver equivalent or greater benefits for supply security and water quality at a lower lifetime cost. Nature-based solutions also generate important co-benefits for biodiversity, climate adaptation and carbon sequestration.
 - 2) W4 should provide clearer support for water-related nature markets. Mechanisms such as nutrient neutrality markets, water quality trading and catchment partnership payment schemes are important channels through which private finance can contribute to improvements in water supply resilience, water quality and catchment health.
 - 3) W4 should reference the need for water infrastructure planning to be consistent with the targets established under the Environment Act, as well as the overarching objectives expected to be set out in the forthcoming Water Reform Bill. This would help ensure greater coherence across the water regulatory and planning landscape.

Chapter 19: Conserving and enhancing the natural environment

This section would replace Chapter 15 of the current Framework on safeguarding and enhancing the natural environment, excluding policies on ground conditions and pollution. Those policies would be incorporated into the new chapter on pollution, public protection and security.

The chapter has been revised to incorporate new legal requirements within the planning system and align with current approaches to working with nature, including a stronger focus on green infrastructure and nature-based solutions.

Aldersgate Group High Level Chapter Response

- The requirement to reflect Local Nature Recovery Strategies (LNRS) in development plans is welcome and an important step towards a coherent national nature strategy. This will ensure that the planning system contributes to nature recovery, rather than simply mitigating harm. We would urge the government to make LNRS alignment a mandatory requirement for plans to pass the soundness test at examination. This would have the knock-on effect of focussing the minds of local authorities on developing robust LNRSs which have been lacking up until now.

Plan-making policies

N1: Identifying environmental opportunities and safeguards

This policy brings together elements of current Framework paragraphs 187, 188 and 192 to set out the key considerations for how the natural environment should be considered in plan-making. It highlights the importance of using relevant environmental evidence, including Local Nature Recovery Strategies, to set out areas which need safeguarding from development because of their importance for nature; balancing the need to safeguard areas because of their potential for nature with the need to deliver development, pursue opportunities for nature recovery, and direct development away from sensitive locations.

New provisions include requirements for plan-makers to set clear standards for green infrastructure, drawing upon national benchmarks. A policy change is also proposed to limit the circumstances in which plans may seek biodiversity net gain contributions which exceed the statutory requirement. Biodiversity net gain plays an important contribution to nature recovery, but needs to be applied in a proportionate and consistent manner across local planning authorities. Reflecting this, requirements which exceed the statutory expectations are proposed to be limited to circumstances in which higher levels of gain can be justified on specific sites being allocated in the development plan, where this would not be on sites that are exempt from the statutory requirement. We are interested in views on how opportunities to provide more net gain from particular sites could also contribute to providing off-site gains for other neighbouring sites in the area, where those other sites are unable to meet the statutory requirement through their own on-site provision.

179) Do you agree that the proposed approach to planning for the natural environment in policy N1, including the proposed approach to biodiversity net gain, strikes the right balance between consistency, viability, deliverability, and supporting nature recovery? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

- Partly disagree

a) Please provide your reasons, particularly if you disagree.

- We welcome the consolidation of environmental considerations into a single policy and the stronger requirement for plans to draw on Local Nature Recovery Strategies (assuming they are published and robust). The emphasis on green infrastructure standards is a positive step forward. Embedding nature into plan-making can help avoid situations where environmental features are under-delivered, nature-value engineered out at later stages, or only addressed through costly compliance measures late in the development process. This represents good planning practice and is important for ensuring that new developments are environmentally resilient and attractive places to live and work.
- However, we have reservations about the proposed restrictions on exceeding 10% BNG requirement. While it is important for Local Planning Authorities (LPAs) to provide clarity and consistency for developers, placing a strict cap on ambition risks undermining the potential for private investment in nature recovery and biodiversity markets. In practice, many companies are increasingly looking to planning policy as a mechanism for generating high-integrity biodiversity units and supporting nature-positive outcomes. Limiting the ability to go beyond the 10% baseline, without appropriate flexibility, could therefore constrain opportunities to scale investment in nature markets and deliver greater environmental benefits.
- We would go further to point out that the government's own [impact assessment](#) and the [Environmental Audit Committee](#) both found that there is little evidence that nature requirements meaningfully delay development, with other factors outside of environmental regulations being more significant blockers (access to finance, high land/house prices, lack of skills).

180) In what circumstances would it be reasonable to seek more than 10% biodiversity net gain on sites being allocated in the development plan, especially where this could support meeting biodiversity net gain obligations on other neighbouring sites in a particular area?

- Higher BNG thresholds should be permitted where there is a strong evidence base, including LNRS mapping, demonstrating that a site sits within or adjacent to a strategic nature recovery priority area. In such cases additional biodiversity gains could generate tradeable off-site units that may be used by neighbouring developments that face greater constraints in delivering biodiversity improvements on their own sites.
- For businesses investing in large mixed-use or infrastructure-adjacent developments, the ability to generate surplus units can create a viable nature market mechanism and provide additional sources of revenue. Planning policy should enable this where appropriate rather than treat it as an exceptional circumstance, provided that development viability is not unreasonably compromised.

National decision-making policies

N2: Improving the natural environment

This policy consolidates and adds to aspects of current Framework paragraphs 187, 192 and 193 to provide clearer and more comprehensive expectations for how new development should contribute positively to the natural environment.

It now makes explicit that landscape character and existing natural features are matters to be considered. New development should also include improvements for nature, through the application of biodiversity net gain where relevant, using actions from Local Nature Recovery Strategies, green infrastructure and nature-based solutions, and adding features for wildlife – with a new requirement for swift bricks in developments.

181) Do you agree policy N2 sets sufficiently clear expectations for how development proposals should consider and enhance the existing natural characteristics of sites proposed for development? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

- Partly agree

a) Please provide your reasons, particularly if you disagree.

- We support the explicit inclusion of landscape character, nature-based solutions and wildlife features as development expectations. These standards align with community expectations and the practices already being adopted voluntarily by many high-integrity businesses. Embedding them in national policy helps create a level playing field for developers across the market, while also supporting the delivery of high-quality, attractive and environmentally resilient places for people to live and work.
- There are circumstances where changes to land use can enhance landscape character, provided there is appropriate local engagement and support. For example, the creation of biodiversity habitats or renewable energy projects within intensively farmed landscapes may alter existing landscape characteristics but can deliver significant benefits for nature recovery, climate mitigation and resilience, and community wellbeing. In such cases, enhancing the character of an area may involve evolving the landscape over time, rather than simply preserving its current condition.
- The policy would benefit from stronger language encouraging developers to go beyond minimum compliance, particularly in relation to green infrastructure and habitat connectivity, where private sector leadership can deliver additional environmental value. Clear guidance on how these requirements interact with BNG accounting would help reduce uncertainty or confusion for applicants and planning authorities. Overall, N2 is a welcome step towards greener, more biodiverse and more attractive towns and places.

N3: Trees in new development

Redrafted from paragraph 136 of the Achieving well-designed places chapter in the current Framework, this policy addresses the integration of trees within new development. It is proposed for inclusion within the natural environment section to ensure consistency and alignment with wider environmental objectives.

N4: Protected Landscapes

This policy revises current Framework paragraphs 189 and 190 on development within protected landscapes. In line with the wider drafting principles proposed across the draft Framework, the term “substantial weight” replaces “great weight” for consistency across policies. An additional provision emphasises the importance of mitigation measures which consider the special qualities of these landscapes where major development is permitted, and the use of compensation where significant harm cannot be mitigated. The latter reflects

changes which we think are needed following the amended legal duty in the Levelling Up and Regeneration Act 2023 that relevant authorities should ‘seek to further’ the purposes of these areas in exercising their functions.

182) Do you agree the policy in Policy N4 provides a sufficiently clear basis for considering development proposals affecting protected landscapes and reflecting the statutory duties which apply to them? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

- Partly agree

a) Please provide your reasons, including how policy can be improved to ensure compliance.

- The Aldersgate Group recognises the need to update policy in light of the amended duty under the Levelling Up and Regeneration Act 2023. The shift from “great weight” to “substantial weight”, alongside the introduction of compensation provisions, is a sensible and pragmatic step.
- However, the policy would benefit from greater clarity about what constitutes adequate mitigation and compensation, particularly for infrastructure and renewable energy projects located in or adjacent to protected landscapes. Businesses require greater certainty and clarity on how competing national priorities, including climate, energy security, resilience and nature, are balanced in planning decisions.

N5: Maintaining the character of the coast

This policy combines current Framework paragraph 191 with 187(c) to consolidate provisions on conserving the character of coastal areas, including those defined as Heritage Coast. It also cross-references relevant policies on coastal change and flood risk to provide a coherent approach.

N6: Areas of particular importance for biodiversity

This policy clarifies the hierarchy of internationally, nationally and locally designated areas of importance for biodiversity, as well as irreplaceable habitats, drawing on current Framework paragraphs 193(b) and (c), 194 and 195. It anticipates the introduction of Environmental Delivery Plans and introduces new national policy clarifying protections for sites which are designated locally, addressing a gap in the current Framework. Local Nature Recovery Strategies will enable local authorities to more easily identify where these areas are, as they align with the guidance for responsible authorities to map areas which are of particular importance for nature.

183) Do you agree policy N6 provides clarity on the treatment of internationally, nationally and locally recognised site within the planning system? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

- Partly agree

a) Please provide your reasons, particularly if you disagree.

- Greater clarity on the hierarchy of designated sites and the new provisions for locally designated areas, which have previously lacked national policy coverage, are welcomed. The anticipated integration of Environmental Delivery Plans (EDPs) is an

opportunity to provide more strategic, landscape-scale protection that supports the ability for the private sector to invest in nature.

- We would, however, flag the importance of ensuring the EDPs do not inadvertently create uncertainty during the transition period. Businesses and developers need clear guidance on how existing designations interact with emerging EDP geographies and delivery mechanisms.

184) Are there any further issues for planning policy that we need to consider as we take forward the implementation of Environmental Delivery Plans?

- The Aldersgate Group would highlight two key issues:
 - EDPs must be designed with private finance in mind. They should provide spatial certainty and timeframes which allow cross-comparison to other forms of nature investment to attract corporate and institutional investment into nature recovery and environmental improvement.
 - The governance and accountability frameworks for EDPs must be clear from the outset, including how they interact with existing processes such as the Habitats Regulation Assessment and BNG accounting. Without this clarity, there is a risk of duplication, regulatory complexity and increased transaction cost for businesses seeking to invest in nature alongside development, which should be encouraged.