

NPPF August 2026 – Summary of Changes

1. Introduction

- 1.1. On the 17th August 2026 the Government confirmed publication of the revised National Planning Policy Framework. This publication followed the release of the draft revised National Planning Policy Framework on 16th December with a consultation running until March 2026.
- 1.2. As such, the below provides a summary of the key changes of relevance to the proposed development, as confirmed in the final version of the Framework.

2. Presumption in Favour of Sustainable Development

- 2.1. Policy S3 of the NPPF provides the revised approach to sustainable development, based on the location of the development site. It states:
 1. *Decisions on development proposal should apply a presumption in favour of sustainable development. This means:*
 - a. *Policy S4 in the Framework should be applied when considering development proposals within settlements;*
 - b. *Outside settlements, policy S5 should be applied; and*
 - c. *In all locations, development proposals that accord with an up-to-date development plan and also the decision-making policies in this Framework should be approved without delay.*
- 2.2. As the proposed development is located outside of a settlement, Policy S3b is applicable and therefore attention is averted to Policy S5 'Principle of development outside settlements'. This policy states that the certain forms of development located outside settlements and identified in Policy S5 should be approved unless the benefits of doing so would be substantially outweighed by adverse effects, when considered against the national decision-making policies set out in the Framework.
- 2.3. Of the forms of development confirmed by Policy S5, it is relevant that this includes within paragraph S5 (1)(a) development of infrastructure, including energy.
- 2.4. Part 5 of policy S5 however, outlines that:
 5. *This policy does not apply to development proposals in the Green Belt or on land designated as Local Green Space, which should instead be determined in accordance with policies HC8, GB6, GB7 and GB8 (as appropriate). However, where development would not be inappropriate in the Green Belt (through the application of HC8 and GB7), proposals should 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, and applying paragraph 2 of this policy.*

- 2.5. It is confirmed that the application site does not lie within the Green Belt or any Local Green Space. Therefore, as a proposal which will deliver energy development, the principle of the development is in accordance with Policy S5 of the new NPPF.
- 2.6. Annex A of the revised NPPF confirms the approach to be taken to decision making in the Implementation of the new Framework. Under this Annex, Paragraph 2 states that *"Development plan policies (or parts of those policies) which are materially inconsistent with national decision-making policies in this Framework should be given very limited weight"*.
- 2.7. For the reasons set out in the Alternative Sites Report accompanying the revised proposals, the Applicant considers that Policy LP25 of the local plan is one which is materially inconsistent with the Framework and it is appropriate for that policy to be accorded very limited weight.

3. Renewable and Clean Energy

- 3.1. Chapter 10 of the new NPPF deals with Securing clean energy and water. This chapter confirms in its opening paragraph that:

"The objective of the policies in this chapter is to support the development and operation of energy and water infrastructure in ways which align with wider development, clean power and net zero objectives (including the delivery of clean power by 2030)."

- 3.2. The policies within this chapter broadly reflect the supportive policy of the former NPPF, however there are a few significant changes to the national policy.
- 3.3. Policy W2 of the NPPF falls under plan making and states:

- 1. *The development plan should support the transition to clean power by planning positively for the increased supply and use of renewable and low carbon energy and electricity network infrastructure. This means that the development plan, should, at the most appropriate level, seek to maximise the potential for suitable development by identifying:*

- a *Areas which are suitable for renewable and low carbon energy development and electricity network infrastructure, including for future re-powering and life extension, where this would help secure their development*

- 3.4. With regard to determining applications for the renewable energy development the new NPPF Policy W3 'Renewable and low carbon energy development and electricity network infrastructure' states:

- 1. *In considering proposals for renewable and low-carbon energy development and electricity network infrastructure, substantial weight should be given to:*
 - a. *The benefits of such development for improving energy security, supporting economic development and/or moving to a net zero future;*
 - b. *In the case of applications for the re-powering and life-extension of existing sites, the additional benefit of utilising an established site for this purpose; and*

- c. *The contribution that small-scale and community-led renewable and low carbon energy projects can make to reducing emissions, along with their associated economic and social benefits.*

- 3.5. Whilst this echoes the outlined in the current NPPF, it is notable that the new policy increases the weight applied to renewable energy proposals to '**substantial**'. It also deals with the benefits of improving energy security, supporting economic development and moving to a net zero future as separate benefits to which the separate substantial weight should be applied.
- 3.6. The revisions to the NPPF also reaffirms that there should be no requirement on applicants to demonstrate the need for renewable or low carbon energy development as per the wording in Paragraph 168a of the previous version of the NPPF.
- 3.7. Paragraph W3.3 of the revised NPPF states that planning applications for time limited proposals should include details of decommissioning and site restoration. Such details are provided within section 3 of the planning statement submitted in support of the planning application. These matters can be appropriately secured in a planning permission by way of a planning condition which requires submission and approval of a detailed decommissioning strategy at an appropriate time shortly in advance of the end of the life of the planning permission.

4. Natural Environment

- 4.1. In the revised NPPF Policy N2 'Improving the natural environment' states:

- 1 *To contribute positively to the natural environment, and support nature's recovery, development proposals should:*
 - a) *Consider the environment qualities of land proposed for development, including habitats, landscape character and the natural beauty of the countryside, and identify opportunities for those qualities to be conserved or enhanced (including through requirements for biodiversity net gain where these apply)*
 - b) *Take into account the quality of agricultural land (including that classified as best and most versatile agricultural land, and its grade), and if significant development of agricultural land is necessary, use areas of poorer quality land where possible;*
 - c) *Take suitable opportunities to connect to and strengthen ecological networks that extend beyond the site, drawing on the measures proposed by Local Nature Recovery Strategies, National Forest Strategies and Community Forest Plans, where present, and other relevant assessments;*
 - d) *Conserve and enhance existing natural features of visual, historic or nature conservation value (such as established trees and hedgerows) wherever possible; and use appropriate landscaping to help create a well-designed place and integrate the development into its surroundings;*
 - e) *Use green infrastructure provided as part of the scheme and nature-based solutions to secure multiple benefits: such as for biodiversity; surface water and pollution management (including maintaining flow rates and water quality); climate change mitigation and adaptation, and recreation;*
 - f) *Minimise impacts on biodiversity and include features for species which support priority or threatened species such as swifts, bats and hedgehogs. Development proposals should incorporate integrated nest boxes (commonly known as swift*

bricks) into their construction unless there are compelling technical reasons which prevent their use, or would make them ineffective; and

- g) Ensure that green infrastructure and other features to support nature are located and designed to minimise risk of future failure, and that appropriate measures are in place for any necessary long-term management.*

- 4.2. It is noted that paragraph 1.b, which addresses agricultural land differs from the previous version of the NPPF which stated at paragraph 187 b that decisions should recognise the intrinsic character and beauty of the countryside and wider benefits from natural capital, including the economic and other benefits of agricultural land. In addition, the paragraph 10 of Annex 1 of the new NPPF sets out Written Ministerial Statements which have either been incorporated or superseded and are no longer relevant. These include the Ministerial Planning Update of 25th March 2015, which also addressed use of agricultural land for solar.
- 4.3. It is considered that the revised wording of the NPPF in respect of BMV land more closely reflects the guidance of the Renewable Energy NPPG paragraph 13. It is noted that 53.3% of the application site is lower grade, non BMV agricultural land. For the reasons explained already in the application planning statement and the applicant's earlier addendum submission, the proposal accords with the revised NPPF policy on agricultural land. The location of the proposal on agricultural land is shown to be necessary, to meet the requirement for new renewable energy generation in a location which benefits from a suitable and available grid connection and the design of the scheme has sought to prefer the use of poorer quality agricultural land where possible within the site.
- 4.4. For reasons set out within the wider submission, the scheme also complies with the other aims of Policy N2. It is noted in particular that the proposed drainage strategy for surface water, including vegetated swales which will provide appropriate drainage and result in biodiversity enhancement accord with sub paragraph (e) of this policy.

5. Flood Risk

- 5.1. Chapter 18 of the revised NPPF provides policy in respect of Managing Flood Risk and Coastal Change.
- 5.2. In terms of decision-making policies, Policy F4 confirms the circumstances where a site-specific flood risk assessment is required, stating:
 - 1. *To inform the assessment of flood risk and, where relevant, appropriate mitigation, a site-specific flood risk assessment should accompany all development proposals in Flood Zones 2, 3a, and 3b as defined in Annex F, table 1.*
 - 2. *In Flood Zone 1, a site-specific flood risk assessment should inform and accompany all development proposals involving:*
 - a. Sites of one hectare or more;*
 - b. Land which has been identified by the Environment Agency as having critical drainage problems; and*
 - c. Land identified in a strategic flood risk assessment or the Flood Map for Planning55 as being at risk of flooding from any source, whether now or in the future.*
 - 3. *Site-specific flood risk assessments should be appropriate to the scale, nature, and location of development and should, where relevant, support an assessment of*

whether a development proposal satisfies the sequential and exception tests set out in policies F5 and F6

- 5.3. The site is predominantly located in an area of Flood Zone 1 with a small area of Flood Zone 2, although no development is proposed in this area. It is also in excess of 1 hectare so the provision of the FRDA as part of the planning application meets this policy requirement.
- 5.4. An updated FRA has been prepared in respect of the proposal (Report ref R001v3_P21-2950-FRA) and is submitted. This meets the requirements of Policy F5\$ of the amended NPPF in supporting the planning application with an appropriate flood risk assessment.
- 5.5. Policy F5 of the new NPPF encompasses the sequential test, reflecting the policy of the previous NPPF. With reference to the LPA's SFRA, it is demonstrated in the FRA confirms that the development proposed lies in Flood Zone 1 and is not in an area at risk from other forms of flooding, therefore the sequential test is passed.
- 5.6. Policy F6 addresses the Exception Test. It is noted with reference to Annex F table 2 that the development of Solar Farms and utility infrastructure for electricity storage are classified as essential infrastructure. Annex F Table 3 confirms that such development in Flood zones 1 or 2 are not required to address the exception test.
- 5.7. Policy F7 addresses ensuring development is safe from flooding. This states:
 1. *Development proposals should not present a risk from flooding to potential occupiers, users, or visitors, and should not increase flood risk elsewhere.*
- 5.8. This policy has been addressed by the provision of the FRDA) and the additional statements provided by the Applicant including the latest version 3 of the FRA.
- 5.9. Policy F8 addresses sustainable drainage systems, stating:
 1. *Development proposals which could affect drainage on or around the development site should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, in ways which are proportionate to the nature and scale of the proposal. The systems employed should provide multifunctional benefits where possible, facilitating improvements in water quality, biodiversity and amenity.*
 2. *Sustainable Drainage Systems should:*
 - a. *Be designed in accordance with the National Standards for Sustainable Drainage Systems;*
 - b. *Have maintenance arrangements in place to ensure an acceptable standard of operation for the anticipated lifetime of the development; and*
 - c. *In the case of proposals for major development, take account of advice from the Lead Local Flood Authority.*
- 5.10. The latest version 3 of the FRA and Drainage Strategy Report provides the following conclusions:
 - The site is not considered to be at significant risk of flooding from any source and access, and egress is not predicted to be impeded during an extreme flood event.

- Surface water runoff from proposed infrastructure will be managed with a series of gravel trenches designed to manage surface water runoff from all storm events up until and including the 1 in 100 year plus 25% allowance for climate change. Additional perimeter swales have been included within the updated proposed drainage strategy drawing, to ensure that the risk of runoff entering neighbouring land is reduced, as per LLFA holding conditions.
- With mitigation measures and the proposed surface water drainage strategy in place, the proposed development will not increase flood risk on site or elsewhere.

5.11. Accordingly, it is considered that the Application meet the requirements of the new NPPF policy in respect of flood matters.

6. Heritage

6.1. When considering the impacts of a development on heritage assets there have been a number of changes in the revision of the NPPF.

6.2. When considering the assessment of effects on heritage assets, Policy HE5 sets out at Part 2 that proposals affecting heritage assets should be accompanied by an assessment of the significance of the asset and on the effect on significance. Policy HE5 states at Part 2 that:

- 2 *Assessments of the potential effects of development proposals on the significance of heritage assets (including through effects on their setting) should identify whether proposals would be likely to:*
 - a *Have a positive effect, which is where the significance of a heritage asset would be enhanced, or better revealed; or*
 - b *Have no effect on the significance of the asset; or*
 - c *Result in harm to the significance of the heritage asset, either from work affecting the asset itself or from development within its setting. The degree of harm should be identified: substantial harm would occur where the development proposal would seriously affect a key element of the asset's significance; or*
 - d *Cause the total loss of the significance of the heritage asset.*
- 3 *In making this assessment it is the effect on an asset's significance rather than the scale of the development which should be considered.*
- 4 *Decision makers should be satisfied that this assessment accurately reflects the effects on heritage assets caused by the proposals.*

6.3. When considering the potential impact on heritage assets, the revised NPPF removes reference made to 'less than substantial harm' as written under Paragraph 215 of the former NPPF. Instead under Policy HE6, Part 1 harm is defined as either 'positive effect, harm, substantial, or total loss of significance'.

6.4. In line with the former wording of the NPPF, reliance the balancing of harm against demonstrable public benefits is carried through into the wording of the revised Framework. Part 4 of Policy HE6 states that:

- 4 *Where a development proposal would harm the significance of a designated heritage asset the effect on the asset and its significance should be weighed against any public benefits resulting from the proposal. Important public benefits can*

include securing the long-term re-use of a vacant or underused listed building, and enabling energy efficiency and low carbon heating measures to be employed.

- 6.5. When considering the conservation of a heritage asset the message that weight should be applied is maintained in Paragraph 1 of Policy HE6 of NPPF; this is referred to as 'substantial weight'.
- 6.6. A Heritage Further Addendum, dated September 2026, has been prepared, addressing amendments to the scheme and considering further consultation comments received on the planning application. This document also considers the implications of the revised NPPF policy in respect of heritage.
- 6.7. The conclusions of the report find a low level of harm which is not considered to be substantial in respect of 2 of the heritage assets assessed, no effect on significance is found in respect of any other assets. In accordance with the policy of the NPPF, the harm identified is to be weighed against the public benefits of the proposal. This balance is considered further in the cover letter accompanying the planning application addendum reports.

7. Conclusions

- 7.1. It is considered that the Proposed Development, as presented, gains further support from the provisions made in the revised NPPF which are even more supportive of renewable energy development. None of the national policy changes arising from the revised NPPF change the overall conclusion that the proposal meets National and Local Planning policy as a whole and is therefore in accordance with Policy S3.1c of the revised NPPF. The proposal should therefore be approved without delay.