



Construction Industry Council (CIC) response to the National Planning and Policy Framework (2025)

<https://www.gov.uk/government/consultations/national-planning-policy-framework-proposed-reforms-and-other-changes-to-the-planning-system>

The importance of good planning to the CIC

The Construction Industry Council (CIC) is the representative forum for professional bodies, research organisations and specialist business associations in the construction industry.

Our members collectively support and represent circa 500,000 individual professionals and 25,000 firms of construction consultants. Effective delivery of high quality new housing, places and public infrastructure for the benefit of society is crucial to our membership.

Any change to the planning system is therefore of critical importance to the CIC and we are keen to input into these important consultations in the hope of providing constructive and informed comments, drawn from the wide expertise of our membership.

The CIC's response

We are not submitting a line-by-line response to the different parts of the consultations. Many of our member bodies will be submitting their own detailed response.

Given the broad church of professionals the CIC represents we are focusing on areas of concern where consensus has coalesced.

The new NPPF's strategic approach to planning, and the consideration of housing delivery in tandem with the provision of infrastructure and amenities, has been widely welcomed. So too has the emphasis on creating well-designed places while strengthening measures to bring forward development in places where it is needed. To this end, we are pleased to see the return of mandatory housing targets and strategic cross-boundary planning.

However, our members need further reassurance that measures intended to significantly increase the speed and quantity of development do not sacrifice design quality, sustainability and the ultimate aim of ensuring that the built environment actively improves people's quality of life. This is both through the quality of buildings and the quality of the landscape and environment in which they live.

Our members are concerned that in some instances the changes to the NPPF risk losing local voice and accountability, undermining progress on net zero and, if planning departments are not appropriately resourced and trained, will result in unchecked substandard development.

Given the measures government is taking to increase development, we feel that meaningful discussion and consideration around local plans is absolutely paramount, as are design skills within planning departments which play a critical role in allowing local authorities to set an ambitious bar for high quality placemaking. While the focus on plan-making is a positive step, it must be supported by a new coordinating section in the NPPF to help policy officers defend sustainable growth against speculative development, while the lack of design skills in local planning departments urgently needs addressing. Some of our members have gone as far as suggesting that the role of a chief planning officer be made mandatory across local planning authorities.

We set out below areas that members feel require more consideration to effectively generate high-quality placemaking outcomes.

The need to safeguard design and landscape quality in the presumption in favour of sustainable development

Our members welcome the general travel of direction of Chapter 4. But given fewer than a third of local planning authorities are thought to have up-to-date local plans, meaningful progress on the drawing up and updating of local plans will also be essential to make this approach work. This will give developers a clearer idea of what the expectations are for different locations and also allow an opportunity for local people to feed into the planning process.

As part of the move to promote truly sustainable development, good design must be an important material consideration. We believe that it should be made clearer that the design



process should incorporate meaningful and inclusive community engagement to ensure that design meets people's needs and expectations.

DP3 2 provides for refusal of development proposals that are not well-designed. We feel that the draft Framework needs to be rigorously clear that inadequate design quality is a legitimate ground for refusal in terms of development both inside and outside of settlements.

Additionally, we are concerned that the current phrasing, outlining that development proposals should be approved "unless the benefits of doing so would be substantially outweighed by any adverse effects", allows too much subjectivity in terms of the decision-making process. Some of our members are recommending that a definition of 'substantial' in this context is added to the draft Framework to avoid inadvertent impacts on the quality of development being brought forward.

If the public is to trust the planning process to deliver on design quality, planning authorities need to ensure what is approved gets delivered by developers. High profile incidences of developers ignoring planning officers and watering down plans on delivery has alienated local communities, and managing the successful building and maintenance of an approved scheme relies on adequately resourced LPAs with both appropriate knowledge and the capability to deliver proactive enforcement.

The planning, design and management of the landscape needs greater consideration as part of good placemaking. One of our members, the Landscape Institute, has emphasised the need for the NPPF (and the accompanying Design and Placemaking Planning Practice Guidance) to be more specific on this requirement. The Institute welcomes the draft policy's recognition of design as a key NPPF component. But it would like greater explicit reference to green infrastructure, such as local green space supporting the character and setting of historic settlements. It also points out that the emphasis on "easy to look after" may conflict with the management needs of complex, multifunctional green infrastructure including sustainable drainage systems, water features, mature trees, and biodiversity.

Lastly, the policy should highlight the design of views to historic and natural landmarks and the integration of distinctive landscape features to strengthen a sense of place.



The presumption in favour of development and the need to improve resilience against flooding and the impacts of climate change

Some of our members are concerned that as drafted the expanded presumption in favour of development would undermine strategic approaches to locating development in the most climate resilient locations, again weaken the application of local policy requirements on climate, and provide no avenue for refusing development on the grounds of creating unacceptably high levels of carbon emissions.

Whilst the opportunity for planning authorities to produce carbon assessments is acknowledged in draft policy CC1 (Planning for climate change), it frustratingly limits the scope of assessments to the spatial strategy and allocations, ignoring key sources of territorial emissions and energy demand, and the significant carbon impact of the qualitative and design aspects of development.

In addition, the draft framework will limit the information that planning authorities can ask for to help determine planning applications. Omitted from the prescribed list at Annex C are climate risk assessments, coastal vulnerability assessments, sequential and exception test evidence, and evidence on carbon emissions.

Given that we will face increasing stress from climate change over the next century, we think it vital to recognise the need for adaptation before it happens. This requires greater statutory monitoring and proactive enforcement of long-term landscape objectives. Our members would like to see more steps taken generally to support the successful growth of sustainable drainage systems including having them embedded directly into planning policy and made mandatory for all new housing developments. With surface water flooding affecting an increasing number of properties across England, and strong economic and environmental evidence in favour of consistent sustainable drainage systems delivery, we consider that a clear national requirement is now essential.

This also needs to be strengthened in the new Design & Placemaking Planning Practice Guidance.



Housing near stations and the need for safeguards against the ‘default yes’

Our members agree with the principle of more homes around infrastructure, including transport hubs, to ensure that all the services and provisions needed to achieve high quality placemaking are in place.

However there are concerns that establishing a "default yes" for high-density development (minimum 40–50 dwellings per hectare) around railway stations, even within the Green Belt if the station is "well-connected", does not have enough safeguards.

Density requirements

Policy L3 introduces a new, proactive approach to urban and suburban densification, requiring development proposals to increase site density, particularly around transport hubs. It sets minimum density standards of 40-50 dwellings per hectare for sites within 800m of stations, prioritising efficient land use over strict adherence to existing local character.

However, we do not think that minimum density standards should be nationally set. A national minimum density standard without clear understandings of local infrastructure, amenities, and mobility patterns provides an unacceptable risk in terms of quality of delivery. Any minimum density requirements need to take into account the urban design vision and prove the intensification is justified through layout, building form, daylight, amenity and public realm.

Where infrastructure, market demand, build typology and local context are ignored, higher density does not automatically equate to sustainable development. RIBA members have shared experiences of overdevelopment of constrained sites, reduced daylight, amenity and adaptability, which have led to growing public resistance to necessary new housing delivery.

They have suggested that if minimum density standards are used at all, they should be strictly limited to central urban locations with proven infrastructure capacity, applied only where public transport frequency, not proximity, supports them, expressed as broad, advisory ranges, not fixed targets, and explicitly subordinate to design quality, liveability and context.

Looking at transport more holistically



We also believe that there are some elements of the policy on development near stations which could benefit from further thought. The consideration of “reasonable walking distance” from a rail station as a metric for bringing forward development does not clarify what is in practice considered to be a reasonable walking distance.

This metric may not take into account mobility patterns in practice, as the assumption that rail is the most important form of public transport to access may not bear out into the reality of people’s lives. For example, if this is the metric used to deliver homes which are occupied by those with restricted mobility, such as older and disabled people or parents and carers, not taking into account other necessary transport options and mobility patterns may have the effect of contributing to social exclusion.

Retaining land for other purposes

There is also a need to ensure that proposals for housing and mixed-use development do not come at the cost of other land uses, for example those relating to minerals, freight and logistics with a clear and historic association.

Public realm

In addition, there were concerns that the quality of the public realm around rail stations does not appear to have been given adequate consideration in policy L3. Significant intensification can have a substantial impact on the immediate public realm, and as such, provisions must be included to ensure the quality of the streetscape. This should include the provision of amenities, cycle storage, and onward transport options. Provisions to guarantee quality are particularly crucial given that, as the Town and Country Planning Association has raised, there is no explicit development management policy included covering sustainable transport.

There is also concern that the proposals for development on greenbelt/grey belt land do not give enough consideration to how sustainable a development might be. We recommend that release in the Green Belt or grey belt should be tied to sustainable infrastructure and connectivity.

Policy Modification PM13: the need for local accountability

We understand that by restricting the ability of local authorities to demand higher standards than those in the Building Regulations (except in accessibility and water



efficiency), PM13 is intended to improve clarity, consistency and accountability in how planning policies are applied and delivered.

We acknowledge that this could be a tool in providing greater certainty for developers and local authorities and reducing delays and ambiguity in the planning process. Unfortunately there is no substantive evidence published to support this as yet.

Members including RIBA feel that there is clear contradiction between PM13 and the stated aims of the draft Framework to meet the challenges of climate change. PM13 in its current form does not align with or support this aim, and the focus of other policies within the draft Framework to support the transition to net zero. It is also inconsistent with the new draft Design and Placemaking Planning Practice Guidance, which has a much stronger emphasis on the need to address climate change and its impacts.

Additionally, the Government has not provided an assessment of the environmental, social and economic consequences of introducing PM13. Without this, it is unclear whether PM13 is compatible with the UK's legally binding carbon budgets under the Climate Change Act. This is particularly crucial given that analysis supporting the 6th and 7th Carbon Budgets shows that the buildings sector will need to reach close to zero carbon in the 2040s without offsetting.

Further, the potential social impacts of PM13 such as energy savings from building to higher efficiency standards, or health impacts for vulnerable populations, have not been subject to assessment.

Our members regard planning as one of the few mandatory drivers to achieve better environmental/energy performance. If a region had elected their representatives in order to improve environmental or energy efficiency standards, then it would in effect not be allowed to meet these local democratic expectations.

Without this lever, local authorities will be prevented from using policy to help residents reduce energy costs and address local air pollution issues beyond Building Regulations. Yet government has not evidenced how restricting the higher standards being set by local authorities would make a significant change to the viability equation.



One of our members, the Building Research Establishment, is particularly concerned that it would set an obstacle to the delivery of the resilient, new non-domestic buildings that England needs.

We understand that there is a careful balancing act to be made between setting local standards where appropriate whilst also driving national consistency. However, we note that a number of local authorities are disappointed by proposals to limit their ability to set high standards of energy efficiency. In the event of such proposals being taken forward, we would recommend that such building regulations at a national level reflect the level of ambition needed to drive significant progress towards our net-zero targets across the nation, including encouraging much needed innovation in this area.

If the Government wishes to bring more consistency to standards set across local authorities, we would urge it to be more ambitious in the minimum standards they set. Otherwise our view is that local authorities should retain the ability to go above this if they so wish.

Managing the transition arrangements

CIC members also recognise that Government's ambitions to move towards a plan-led system may not be achieved quickly. This will therefore necessitate interim provisions to ensure development comes forward that maintains and reinforces sustainable settlement patterns, in lieu of a local plan. CIC notes that there is currently no policy steer for plan making relating to train stations and would encourage one to come forward to better align the separate elements of the proposed Framework



Summing up

While our members are hugely positive on the reforms and a plan-based approach to decision making coupled with a return to regional planning strategies they are emphasising that for successful delivery to happen it has to be accompanied by a change of culture and greater safeguards to ensure that good design in quality and placemaking is actually delivered in practice.

Our members want to see

- Clear implementation guidance
- Adequate resources for local planning authorities which are bolstered with design skills
- Strong professional leadership which could include the introduction of a statutory chief planner in every local planning authority. This would help ensure that the NPPF and accompanying Design and Placemaking Planning Practice Guidance is followed and not watered down on delivery. It would also help to manage the transition arrangements.
- Good design protected in the strengthening of the presumption in favour of sustainable development. The NPPF needs to make it clear that inadequate design quality is a legitimate ground for refusal in terms of development both inside and outside of settlements.
- Clarity over the design process which should incorporate meaningful and inclusive community engagement to ensure that design meets people's needs and expectations.
- Greater consideration given to promoting sustainability and giving local people a voice by allowing local authorities to ask for higher green standards than those set out in the Building Regulations.

