

# NATIONAL PLANNING POLICY FRAMEWORK (NPPF) 2025 (draft): Implications for NPN members

NPPF 2025 extracts in black. **Comments in red.**

Many of these points offer a small amount of positive mileage for added pressure from NPN members on emerging projects – at least in principle. (Other points in the NPPF, not covered here, may be a small step back!)

## PRE-APPLICATION ENGAGEMENT

### DM1: Preparing development proposals

Proposals for major development should:

- **Be informed by early engagement with neighbours and the local community**, as well as with the local planning authority, statutory consultees and other relevant bodies where appropriate, **to identify and seek to resolve key planning matters prior to the submission of a planning application**. This pre-application engagement should be proportionate to the nature of the scheme and those likely to be affected by it; and

Note the word '**should**'. This is a small step up from previous NPPFs that have only ever talked about 'encouraging' pre-application engagement.

- **Be accompanied by a concise planning statement setting out:**
  - how the proposals are consistent with relevant development plan and national decision-making policies;
  - the outcome of pre-application engagement and **the extent to which the proposals have changed in response to this engagement**; and

The bits in bold above are new (though they should now be considered standard practice).

- **Pre-application engagement may also be required where proposals raise complex planning matters, such as the potential effect on heritage assets.**

Note the (new) word '**required**', i.e. a step beyond '**should**'. 'Require' is likely to apply to many sites in Bristol, and 'should' would apply to all! This may be positive in principle but some key questions remain, for example:

- The word 'should' adds little in reality so applicants can ignore it
- Anything invoking the word 'required' will need legislative backing.
- That begs the question of defining what a complex site is.
- Even if that is clarified, who does the requiring? Bristol City Council obviously, but can NPN groups who know of applications on their way then notify the Council who then decide (or not) to require engagement?
- What to do with the majority of applications that arrive out of the blue with no prior awareness on the Council's or a community's behalf. Presumably engagement cannot be required retrospectively?

- And if applicants' reports must show "*the extent to which the proposals have changed in response to this engagement*", then the local authority must also show how the results noted in the report have been taken into consideration in the case officer's conclusions.

### **DM3: Determining development proposals**

When considering development proposals, local planning authorities should:

- **Take account of planning matters raised during any pre-application engagement**, including any positive responses to this engagement, as well as representations on the proposals;

This phrasing is new in NPPF 2025.

## **DESIGN**

### **PM4: Supplementary plans**

Supplementary plans may be used by relevant plan-making authorities to address specific issues, where these are not already covered in other parts of the development plan for the area or the policies in this Framework. They should be limited to:

- Setting out locally-specific **design standards** to provide clear design expectations that support the delivery of development; or ....

Supplementary Plans replace Supplementary Planning Documents. When done – with community engagement (see next point) – they are then formally examined using a more light touch approach as with Neighbourhood Plans and then become a full part of the development plan, i.e. with more status than just a material consideration.

### **DP2: Local Design Guides, Local Design Codes and Masterplans**

Where design guides, design codes and masterplans are necessary, these design tools should:

- Reflect a clear understanding of and address **the character of the site or area which they cover, the wider context and opportunities to strengthen existing character**;
- Be informed by an understanding of the economic, social and environmental context and conditions for implementation, including through **effective community engagement so that local aspirations are taken into account**;
- Include a level of detail and degree of prescription proportionate to the circumstances and scale of change proposed; and

Until we receive further clarification, this suggests a role for neighbourhood level Character Assessments and Guides, even perhaps Codes, to become Supplementary Plans as above, thus acquiring greater status. Some of the Assessments in Bristol prepared to date – including those done by/with local communities - have been 'adopted' by the Council and are therefore currently a material consideration. Some made Neighbourhood Plans include area assessments and design guides so have therefore passed examination. Future assessments etc. may well therefore be able to

become Supplementary Plans, if having to go through formal examination. This might also apply to design codes done by communities for specific (probably larger) sites.

Like some other authorities, Bristol City Council is preparing a less prescriptive Design Guide rather than a highly detailed (and extremely time-consuming and expensive!) Design Code. Consultation on a draft is expected during 2026.

## NEIGHBOURHOOD PLANS

The required parts of the development plan ..... may additionally include:

- **Neighbourhood plans**, produced by parish councils and **neighbourhood forums**.

Note the text in bold above about plans and forums. Anything in Bristol would have to be developed via an Urban Forum. The government want to see more urban Neighbourhood Plans and may change the requirements for a Forum. However, grant aid from the government, via Locality, for Neighbourhood Plans ceased in April 2025. This is particularly damaging for Urban Forums which (unlike Parish/Town Councils) lack access their own funds. It is currently unclear whether the financial support to authorities for their role in advancing and making Neighbourhood Plans will remain available into 2026/2027.

### PM5: Neighbourhood Plans

Neighbourhood plans allow local communities to plan positively for their areas by identifying and addressing community priorities that can be met or supported through the planning system. They should do this by:

- Allocating land to meet the development needs of their designated area, where it is appropriate to do so; and
- Setting out policies which address particular local issues, these should relate to site-specific matters or, where appropriate, may cover wider issues such as the provision of infrastructure and community facilities, regeneration opportunities, design requirements (including design codes), local environmental improvements and the conservation of local heritage assets.

Neighbourhood plans should not promote less development than provided for in other parts of the development plan for the area.

Although the general value of Neighbourhood Plans does not appear to have been reduced, the above is slightly different to and slightly less text than in NPPF 2024.

### In NPPF 2024 but not 2025:

*“Neighbourhood planning groups should also give particular consideration to the opportunities for allocating small and medium-sized sites (of a size consistent with paragraph 73a) suitable for housing in their area.*

*Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers.”*

## **NEIGHBOURHOOD PRIORITIES STATEMENTS**

These are not mentioned in the new NPPF but are now worth noting as a 'light-tough' alternative to full Neighbourhood Plans. They came in a while back and are being promoted by government as 'light-touch', so are very much targeted at urban (non-parished) places as in Bristol. In terms of the scope and level of detail of information/evidence, they are halfway between a wish-list and a Neighbourhood Plan. They can address housing sites but cannot allocate. They can also address design and other aspects. In urban areas they can only be done by a Neighbourhood Forum, something that has caused problems for years. They must be developed with community 'consultation' and then consulted on formally. All being well, the LPA must 'have regard' to the final version but it is not clear whether that is any better than 'material consideration'.

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