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Date: 9 March 2026

Dear Sir or Madam

REVISED NATIONAL PLANNING POLICY FRAMEWORK (NPPF) MARCH 2026

On behalf of Wandsworth Council, I am pleased to provide our detailed representations on the Government's consultation on a revised National Planning Policy Framework (NPPF).

As we set out in our [response and letters around the time of the 2024 NPPF consultation](#), the Council supports the principle of targeted and proportionate planning reforms that seek to increase the supply of housing, and which unlock growth more generally, in response to the national housing crisis and to assist with delivery of the Government's 1.5m homes target by the end of this parliament.

In this context, the Council considers it vital that the planning system remains plan-led and actively encourages universal local plan coverage. This remains the best way of planning for both growth and environmental enhancement, in a way that commands local support. Local Plans help give certainty and stability to local people and developers and reconcile between competing needs. It is also vital that any reforms are designed to help unlock the right types and tenures of housing, with a particular emphasis on supporting local authorities, and developers, to deliver more genuinely affordable housing and infrastructure.

For these reasons, the Council is concerned about a number of proposed measures within the consultation version of the NPPF that appear to undermine the primacy of Local Plans and severely weaken the certainty and stability that they aim to provide. For example, the Council notes that all development within settlements will now be subject to a permanent presumption in favour of sustainable development irrespective of how well a local authority, or its local plan, is meeting local needs. The criteria set out in Policy S4 appears to directly invite a race to the bottom in terms of development quality and will be interpreted by developers, like the current tilted balance is, as an invitation to seek to disapply as many



local plan policies as possible, particularly where these are not carbon copies of the NPPF. This will inevitably include policies that may have only very recently been found sound and well-justified by Inspectors, and which reflect years of hard work and local community engagement, reflecting the effective functioning of the democratic process. The Council does not oppose the principle of the NPPF encouraging the planning system to facilitate greater levels of growth, but would strongly encourage the Government to consider whether this particular measure is consistent with a plan-led system or providing appropriate incentives for plan preparation. We would strongly encourage the Government to re-establish the basis that a tilted balance will only apply where plans are measurably out of date or to at least make clear that conflicts with local plan policies, particularly those that are relatively recent, and not just the NPPF, should also be taken to provide a strong reason for refusal.

For similar reasons, the Council has concerns over the proposal that local plan policies which are inconsistent *in any way* with the revised NPPF should be afforded limited weight. This terminology is not clear but, worryingly, might suggest that policies that are merely written in a different style or order to the NPPF, or that include additional but otherwise justified criteria should be given limited weight. As above, this could include policies that have only very recently been found sound and justified by an Inspector, and which command community support and trust. The Council would encourage the Government to remove this provision or else make it much clearer that the reduced weight would apply only where there is a material contradiction in how the Local Plan and NPPF instruct a decision-maker to approach a specific policy requirement, and that the direction on weight only applies to that contradicted requirement, rather than to a local plan policy as a whole.

The Council also feels it is incredibly important that the NPPF provides a positive and genuinely ambitious framework for driving positive planning outcomes. Given the diversity of planning issues across the country, including market conditions, land values, the extent of planning constraints and levels of need, it is important that the NPPF does not seek to homogenise issues that are naturally diverse. Any attempt to do this will inevitably place a cap on ambition which means that the ability for the planning system to drive change will suffer in authorities with the greatest capacity for ambition, with no guarantee of improvement in areas with lower capacity. A good example of this is in relation to the Government's proposed restrictions on authorities setting quantitative standards on topics outside of a defined list, and their ability to set energy efficiency standards above Building Regulations. On the former, the Council notes with concern that economic development standards are not included on this list which in Wandsworth, and many parts of London, have been vitally important in driving the delivery of much-needed affordable workspace and employment and skills contributions in recent years. The particular characteristics of Wandsworth's economic markets, and indeed London's, necessitate these, yet the homogenisation of standards across the country risks these locally important standards being restricted. Likewise, London has played a crucial role in recent years on driving ambition on energy efficiency standards, consistent with the climate crisis. These ambitious policies are now well-embedded in land values and universally expected by developers.

Removing these policies would be a completely unnecessary backwards step on ambition in climate change policy which is inconsistent with local, regional and national climate change goals, and which is highly unlikely to materially improve output, but rather drive a reinflation of land values.

Similar to the above, we remain of the view that placing restrictions on the ability for local plans to modify or depart from national policies is unreasonable. We support the principle of making local plans more streamlined, both in terms of limiting unnecessary duplication and the wider new 30-month process. However, in light of the diversity of planning issues across the country as highlighted above, the NPPF cannot realistically address all of these planning issues comprehensively. Traditionally this would facilitate a sensible role for local plans to apply national policy in a local context, the justification for which would be assessed routinely through the examination process. However, the consultation NPPF implies this will not be allowed, even where justified. The Council would encourage the Government to consider whether having gaps in policy coverage or preventing the ability for local plans to elaborate upon how national policies will be interpreted in scenarios beyond those envisaged by the NPPF is consistent with the Government's ambition to make the planning system more predictable and consistent. The Council would be concerned that subjectivity would remain inherent to the decision-making process yet decision makers will have vaguer policies upon which to base their decisions, particularly outside of the core scenarios envisaged by the NPPF.

Beyond these core concerns, the Council's full response, which accompanies this letter, covers a full range of the questions set out. We hope it will be helpful in considering, and where relevant, improving the wording of the final document. The Council would be very happy to work with your teams to clarify or elaborate upon the detailed suggestions it has set out in its full response.

Yours faithfully

Cllr Aydin Dikerdem

Cabinet Member for Housing

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