DAC Planning

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Planning Policy Consultation Team
Planning Directorate – Planning Policy Division
Ministry of Housing, Communities and Local Government
Floor 3, Fry Building
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London
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National Planning Policy Framework (NPPF) Consultation 2026

Dear Sir/Madam

I am pleased to provide DAC Planning's response in relation to the above consultation.

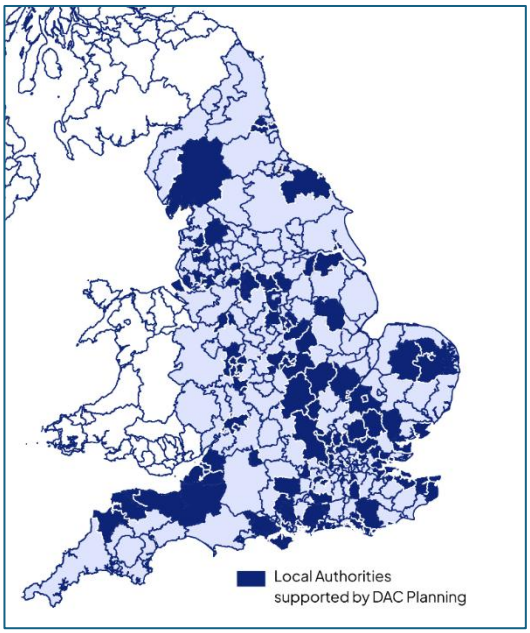
About Us

DAC was founded in 2016 by Managing Director David Coleman. DAC is a highly professional and award-winning planning consultancy specialising in working with public sector clients. DAC upholds a public service ethos and we are passionate about promoting a plan-led planning system for the benefit of local communities.

To date we have provided support to over 150 local authorities nationally in various capacities. The figure below illustrates the authorities that DAC has worked with (correct up until August 2025).

Our key services include:

- Local plan production and implementation
- Project management, capacity building and programme development
- Infrastructure planning and developer contributions
- Strategic planning and duty to cooperate
- Research and evidence base gathering
- Independent examination
- Development management and planning appeals
- Neighbourhood plan production
- Training delivery
- Facilitation of community and stakeholder engagement.



Our team incorporates considerable experience and understanding of plan making and examination, both from an advisory perspective having worked with over 120 local authorities on behalf of the Planning Advisory Service (PAS) since 2019, but also through the work that we undertake directly with local authorities. We have up to date and ongoing experience of production and examination of high profile and complex local plans, and we are actively engaged in discussions relating to the introduction of the new plan making system. Our work to develop the Local Plan Route Mapper and Toolkit on behalf of PAS (with the latest update in May 2025) remains topical and continues to provide best practice for plan-makers under the current plan-making approach:

https://www.local.gov.uk/pas/plans/local-plan-route-mapper-and-toolkit-may-2025

We have also recently produced project management guidance and templates on behalf of PAS for local planning authorities that are seeking to submit a local plan under the 'legacy' local plan making system:

https://www.local.gov.uk/pas/plans/project-managing-local-plan

We are currently providing direct plan-making support, masterclasses, updated project management guidance and training to a wide range of local authorities nationally on behalf of PAS. This support and advice is being provided both to local planning authorities working to produce local plans under the 'legacy' plan making system and to those that are seeking to progress support under the 'new' plan making system currently being introduced.

DAC has recently established The Planning Academy (TPA) which offers clear, practical CPD accredited training design to support people working in and around the planning system. Further information can be found via the website www.theplanningacademy.com

Context for Our Consultation Response

DAC has provided extensive responses to a range of consultations undertaken by the Government in relation to proposed planning reform over recent years. These include:

- Response to the Planning White Paper in October 2020
- The LURB Consultation on the Implementation of Plan Making Reforms in October 2023
- NPPF Consultation in September 2024

In response to this consultation, we have provided extensive inputs into the response submitted by the Royal Town Planning Institute (RTPI). As a result, we do not seek to replicate detailed responses already set out by the RTPI. Instead, we wish to make some specific and important observations founded on our particular experience and expertise in plan-making which we trust will assist in finalising the revised NPPF.

DAC Planning Response

The draft National Planning Policy Framework (NPPF) (Plan-making and national decision-making policies) December 2025 marks a significant change to the planning system and DAC welcomes the return of regional planning in the form of spatial development strategies (SDS), and in particular, the continued emphasis given to a "genuinely plan-led" system which prioritises the preparation of development plans. We also welcome:

- Paragraph 14 which explains the purpose of the planning system
- The revised structure of the draft NPPF which separates plan-making and decision-making policies.
- Increased clarification regarding where substantial weight may be given to particular considerations in decision making[1].

Despite our support outlined above, we do wish to draw out some concerns regarding the details outlined in the draft NPPF and how it aligns with the new Local Plan Regulations 2026 (published on 4 March 2026). The remainder of our response draws out key points which we wish to raise and draw to your attention with regard to the following elements of the draft NPPF:

- Non-statutory National Decision Making Policies
- Separating Plan-making and decision-making policies
- Comments in relation to specific plan-making (PM) policies

Non-statutory National Decision Making Policies

- We consider that the decision not to prepare national development management policies (NDMPs) in the statutory form envisaged by the Levelling-up and Regeneration Act 2023 (LURA 2023), and instead publish a serious of non-statutory national decision-making policies in a manner consistent with the Government's publication of the NPPF over many years, may negatively impact plan making under the new system, in two ways:
    - Further stretch the resources of local planning authorities and their partners
    - Impact the 30-month plan making timeframe
- Under the LURA 2023, it would not be legally open to local planning authorities to prepare local plan policies that are "inconsistent with or (in substance) repeat any national development management policy"[2]. This has potential to effectively prevent local plans from addressing matters covered by NDMPs. Although this approach has some drawbacks, it would free up LPAs to focus attention on locally specific matters including the design quality and deliverability of development sites.
- Regardless of draft NPPF Policies PM6(1)(c) and PM15(1)(d), non-statutory development management policies allow for local plans to include matters covered by national decision-making policies, whether through duplication or inconsistency, so long as justified by sufficient evidence. The consequential outcome of this may be a situation where LPAs commission more locally specific evidence to seek to justify more detailed policies. This may result in prolonged evidence preparation and/or procurement as local authorities and their consultants seek to devise strategies that satisfy a higher evidential threshold.
- We therefore recommend that national decision-making policies be made statutory national development management policies. Such policies should be truly national in

[1] However we note that only instances where 'substantial' weight is afforded to a consideration, is set out. There is an argument that it would be helpful to indicate where on a scale that 'substantial' sits in comparison to other terms used to afford weight, for example, limited; moderate, for example. This may be an opportunity to promote a consistent approach to measuring weight.
[2] Levelling-up and Regeneration Act 2023, Sch 7 (Plan making), Paragraph 15C(9)(b)

nature and provide clear guidelines in situations where local plans may deviate from national development management policies.

Separate Plan Making and Decision Making Policies

- In general we support the separation of plan making and decision making policies, but we do wish to flag up possible inconsistencies and challenges that could arise as a result of dealing with the two separately.
- For example, Policy PM9 states *"*For plans that allocate specific sites for development the assessment should be undertaken with reference to national guidance [footnote 15] and include:…". Footnote 15 directly references relevant tools and templates in Create or update a local plan using the new system - GOV.UK (CULP) for undertaking site specific assessment, for plan making.
- Upon reviewing the relevant tools and templates, within CULP, we note that it defines 'deliverable' sites as "For a housing site to be considered deliverable it should be suitable for development, available now, **with at least some development achievable within 5 years of the likely adoption date of the plan**." [our emphasis].
- However, the draft NPPF definition, as provided in Annex B: Glossary is: "sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within 5 years.".
- Furthermore, CULP guidance differs from the PPG guidance with regard to land availability assessment.
- The above example raises a number of questions:
    - Will the current Planning Practice Guidance be replaced by CULP?
    - Will the draft NPPF Annex B be updated to align with CULP or vice versa?
    - Are the differences between the definition of 'deliverable' for the purposes of decision making and plan making deliberate in order to mark a difference between the two processes? If so, this could result in significant complexity and we recommend that these inconsistencies are rectified or clearly explained.

Comments in relation to specific plan-making (PM) policies

PM1: Spatial development strategies

- 2a) we support the requirement for an SDS to cover at least 20 years. It would be helpful to clarify whether or not 'objectively assessed needs for housing' equates to the total local housing need (calculated using the standard method) for each local authority area within the SDS in order to avoid any ambiguity. It would also be helpful to clarify what 'other uses' are best considered at a strategic level rather than leaving it subject to interpretation.
- 2b) what scale of allocations are considered to be 'large'? The policy would benefit from clarifying how an SDS should seek to plan for large scale growth and infrastructure which is located across SDS borders – both in terms of cooperation between plan-makers and in terms of content. A current example of this would be Harlow and Gilston Garden Town which is located across the Essex and Herts border

and would in the future therefore need to be considered equally by an SDS for Herts and an SDS for Greater Essex.

- 2d) there is an opportunity here to clarify the expectation that Green Belt Assessment should be undertaken across local planning authority boundaries to inform SDS production. Whilst there may sometimes be a requirement for more detailed of locally specific assessment to be undertaken at an LPA level, strategic Green Belt Assessment over a wider area would provide for a consistency of approach and economies of scale. Green Belts do not stop at the LPA boundary.
- 2f) we feel strongly that an SDS should be underpinned by an Infrastructure Delivery Plan or Strategy. This in turn can then provide a positive and constructive basis for infrastructure planning and delivery associated with local plans. The text lacks clarity in this regard and there is an opportunity to clearly state that an IDP or IDS should be produced and what it should cover. This leads to ambiguity for plan-makers.
- 2g) does this mean that an SDS should provide a Policies Map? It is currently unclear.
- 2i) the text states 'adopting a replacement no later than 10 years after the current version was adopted'. It would be more logical to refer to the timescale for submitting an SDS for Examination, as you cannot have control over the timescales of the Examination process. What are the repercussions if this requirement is not met? On a wider point, careful consideration should be given to ensure that the wording of this clause does not lead to reviews and updates being undertaken of an SDS too frequently or as a result of a change in political administration. For SDS's to be effective they must be stable and relatively long-term in nature. Otherwise, the plan-led system could be undermined. The wording 'to respond to significant change or evidence of needs, opportunities or development constraints' is too vague and open to interpretation in our view.
- 3) this paragraph appears to overlap with and potentially contradict 2i).

PM2: Local plans

- We strongly feel that PM2 should recognise the significant importance and role of infrastructure planning in informing and supporting local plans. This is a gap in the current NPPF which should be filled. At present national planning policy is relatively silent about the need to produce an Infrastructure Delivery Plan or Strategy. In our view this is a major oversight and it would be highly beneficial to clearly state the expectation that infrastructure plans should be produced to supplement a local plan.
- 1) there is no reference here to protecting the natural environment or to mitigating climate change.
- 1b) there appears to be a typo here – 'setting out a spatial strategy, policies for….'. We would suggest that the timescale for a local plan should be reduced to 'no less than 10 years from the point of adoption of the plan' in order to avoid too much potential overlap or duplication with SDS's which should be longer term in nature.
- 2) Local plans must be prepared and adopted within 30 months of publishing Gateway 1 self-assessment. In reviewing Create or Update a Local Plan (CULP)[3] it is clear that Local Planning Authorities (LPA) have 23 months to prepare a Local Plan, with the remaining time (24 – 30 months allowed for submission, examination

[3] 30-month local plan process: an overview - GOV.UK

and adoption). It may provide more clarity within PM2 if this paragraph notes that the plan must be prepared for submission in 24 months, followed by six months for submission, examination and adoption. Furthermore we suggest it would be more accurate to explain within PM2 that a "modifications stage" during the Examination "will extend the 30 month timeline"[4].

- 2) what are the repercussions if a local plan is not prepared and adopted within 30 months or publishing a Gateway 1 self-assessment?

PM4: Supplementary plans

- 1) There may be other situations where the production of a Supplementary Plan may be beneficial. For instance, in setting out more detailed policies covering a period of longer-term growth or change it may be necessary for a further plan to follow the Local Plan at a later date once more information is available. This would essentially replace the role of an Area Action Plan. It is simply not always possible to be able to set out detailed policy requirements for all longer-term allocations within a Local Plan at the point of production.

PM6: General principles for plan-making

- There is an absence of guidance here on how planning policies should be written to ensure that they can be effective and easily implemented. A disproportionate amount of time is spent at local plan examinations seeking to rewrite policies through main modifications that have not been well drafted. This policy could easily incorporate a number of basic 'rules' to help ensure that policies are well written before they reach the examination stage. We would be pleased to provide further suggestions in this regard based upon training that we undertake with LPAs on this matter.

PM7: Initiating plan-making for local plans and minerals and waste plans

- This is supported. It should be noted that DAC Planning has produced a range of guidance and best practice on behalf of the Planning Advisory Service in relation to effective project management of local plans. We consider that the 30 month timeframe (or 23 months as noted above) will be very challenging for LPAs to meet and we would welcome further discussion around how processes can be streamlined and in some cases standardised to support the achievement of this.

PM9: Identifying land for development

- As drafted we assume that this is intended to relate to the production of Neighbourhood Plans, Local Plans and SDSs. Do the CULP tools and templates relate to NPs and SDSs? We would suggest that the policy should be clear that the requirements should be carried out proportionately having regard to the type of development plan being produced.

[4] 30-month local plan process: an overview - GOV.UK

PM10: Maintaining cooperation between plan-making authorities

- 3) Presumably the same applies to Local Plans and Neighbourhood Plans? So in other words, matters that are addressed by an adopted Local Plan do not need to be revisited by a Neighbourhood Plan.
- 4) we welcome the requirement for 'pragmatic decisions' to be taken 'on the basis of available information'. However, can it be made clear that this is based on available information at the time of plan preparation? Local Plan examinations are frequently subject to delay when new information becomes available at a late stage which simply was not available at the time of plan preparation.

PM11: Demonstrating cooperation between plan-making authorities

- 1) we assume that the term 'plan-making authorities' relates to both SDS production and Local Plan production but not Neighbourhood Plan production? It is important to define and clarify this in order to avoid confusion. Perhaps the term could be defined in the glossary.

PM14: Examining spatial development strategiies

- 1) to be consistent with PM15 the text should read 'by an examiner (or panel of examiners) appointed by….'
- 2a) does the wording 'is based on effective joint working on cross-boundary strategic matters' relate to joint working across boundaries within the SDS area, outside the SDS area or both? What does the term 'stringent efforts' mean? This is highly subjective which could lead to significant ambiguity, debate and delay.
- 2c) we strongly suggest that the wording 'reasonable prospect that local plans will be capable of identifying site allocations to implement its spatial strategy' is deficient at present. We suggest that it should include reference to infrastructure. What is meant by a 'reasonable prospect'? This is highly subjective which could lead to significant ambiguity, debate and delay.
- 3) Rather than assessing whether or not 'reasonable assumptions' have been made we would suggest that it would be clearer and more appropriate to assess whether or not there is a 'reasonable prospect that the infrastructure will be delivered as planned'.

PM15: Examining local plans and minerals and waste plans

- The purpose of the examination is to assess whether the plan is sound and legally compliant. The words 'legally compliant' are missing.
- 1c) It is not clear why this differs from the approach here differs considerably from the equivalent 'effective' test for an SDS. What is meant by a 'realistic' policy? This is highly subjective which could lead to significant ambiguity, debate and delay. We would strongly suggest that the test should relate to a reasonable prospect that site allocations and infrastructure are capable of being deliverable at the time envisioned. If supporting infrastructure cannot be delivered then the allocation should not be going forward.
- 1d) not clear why this test of soundness differs to that for the SDS.

PM16: Examining supplementary plans

- Who will undertake the examination?
- 1) if a Supplementary Plan is to have DPD status and the ability to allocate sites, should the relevant tests of soundness not be applied as well? It does not make sense that it would potentially be much easier to allocate a site through a Supplementary Plan process than through a local plan. Does the Plan not need to be realistic or effective?
- 1a) the wording 'are nearby to each other' appears to us to be very ambiguous and subject to interpretation.
- 1b) the wording does not consider the relationship between the Supplementary Plan and any made, adopted or emerging plans in the area.

PM17: Examining neighbourhood plans

- Who undertakes the examination?

We hope that the above response is helpful to inform the finalisation of changes to the Framework. Please do not hesitate to contact us should you require further discussion on any of the points or suggestions that we have made in our response.

Yours faithfully

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