



Basingstoke
and Deane

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Matthew Pennycook MP
Minister of State for Housing, Communities and Local Government

By email: matthew.pennycook.mp@parliament.uk /
ministerial.correspondence@communities.gov.uk and
PlanningPolicyConsultation@communities.gov.uk

5 March 2026

Dear Matthew,

Consultation Response on Proposed National Planning Policy Framework (NPPF)

Basingstoke and Deane Borough Council welcomes the opportunity to comment on the Government's proposed new National Planning Policy Framework (NPPF). We support the ambition to create a clearer and more effective planning system. We also support some of the proposed updates to key policy areas such as the recognition of the importance of our chalk streams. However, we have significant concerns that the proposed framework will adversely affect our ability to plan positively for our borough, respond to local circumstances, and achieve the spatial, environmental and community-focused outcomes our residents expect. Whilst the council has submitted a technical response to many of the individual consultation questions, this letter outlines a number of in principle concerns that we would like to raise with you direct.

The introduction of National Decision-Making Policies (NDMPs), combined with the direction that local plans should not "duplicate, substantively restate or modify" these policies, severely restricts the scope of local plans to address locally specific issues. Many of the draft NDMPs leave limited room for local policies which respond to the borough's unique environmental constraints and character. The proposed removal of the ability to set local climate change related policies, for example the setting of local energy-efficiency standard limits, is of particular concern and restricts our ability to support the council's climate related commitments which respond directly to our climate emergency declaration made in 2019.

Similarly, our ecological emergency declaration in 2021 highlights the importance of the natural environment within the borough. The ability to have local planning policies which address important local issues is vital to ensuring that nature across the borough is appropriately managed, protected, enhanced and restored. Our evolving plan also aimed to introduce a local liveability standard to deliver high quality development with measures to address such issues as the provision of adequate ventilation and adequate space to

Chief Executive Russell O'Keefe
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support day to day needs including buggy and bin storage. Such approaches appear to be completely undermined by the NDMPs. Whilst the draft NPPF indicates that there may be opportunities to include limited local policies as an exception and where this is justified, further information is required to provide clarity on the areas that local communities can truly influence.

The proposed NPPF also materially reduces the role and influence of neighbourhood plans by centralising policy detail nationally, leaving less scope for meaningful neighbourhood-specific policies. Also, whilst the proposed guidance states that local plans should allocate sites which will support and enhance the vitality of rural communities, the role of neighbourhood plans is not reflected. Given the considerable time and voluntary effort required to prepare neighbourhood plans, the reduced influence is likely to discourage communities from engaging in the planning process and successfully guiding development and change in their local areas. The future role of neighbourhood planning should be clarified by the government and reflected more fully in the NPPF.

While the council acknowledges the national housing challenge, there is concern about the extent to which the proposed NPPF places housing delivery at the centre of most strategic policy decisions, at the expense of balanced place-making. This narrow emphasis risks encouraging development in unsustainable rural locations, placing additional pressure on rural villages and undermining local strategies to protect local assets. The NDMP are more permissive in nature as a result of the housing delivery agenda, to the expense of other important issues. In particular, the requirement to apply a “tilted balance” in favour of development across a wide range of circumstances, combined with a broader definition of settlements could significantly increase speculative development in areas with environmental or infrastructure constraints. The changes also diminish the ability to manage growth in a way that aligns with both strategic and local infrastructure capacity – this is not adequately addressed in the proposed new guidance.

The impact of the draft NPPF on our evolving new Local Plan is also of significant concern. The government has encouraged councils to progress quickly with plan making and the council is working to a very tight timetable to adopt a legacy plan under the existing planning system and the 2024 NPPF. Whilst this was already extremely challenging, particularly in light of the significantly increased housing numbers that were published in December 2024, the new NPPF causes a huge amount of further uncertainty and complication. The role of legacy plans, and their ability to include local decision-making policies, is not adequately addressed in the transitional arrangements and this leaves councils in the position where it is unclear to what extent due regard should be had to the new NPPF and to what extent policies should be redrafted in a short timescale and whether they must be reconsulted on. The NPPF states that policies that are “in any way inconsistent” with NDMPs must be given very limited weight but given that the final NPPF is not due to be published until at least the summer, it is queried how councils are able to respond to this by amending or removing policies, undertake further consultation and then submit a plan by the end of the year. This appears unachievable and the council therefore requests further clarity on this point at your earliest convenience and through any updates to the NPPF

Some more specific points that we would also like to raise with you are as follows:

- In terms of the provision of affordable housing, although on-site provision is still preferred, off-site delivery options are not adequately discouraged and this should be strengthened
- The strengthening of infrastructure requirements within local plans is supported but mechanisms need to be put in place to ensure that developers plan and build infrastructure upfront (and with realistic budgets) rather than it being considered as a nice to have or an afterthought. The timely delivery of adequate infrastructure to fully meet needs is vital to support the government's housing building agenda.
- The draft NPPF appears to provide an option for local authorities to interact with other regulatory frameworks, such as those relating to water quality, where they have failed. Additional clarification is needed regarding what the new wording means in practice in terms of the role of a LPA, especially given current national issues relating to water infrastructure and the ability of water companies to meet needs, both current and future. The ability to interact should be strengthened so that it can be used in practice.
- The requirement for minimum densities on sites within a reasonable walking distance of stations (40 or 50 dph) should recognise that such stations could lie within rural areas where lower densities would suitably reflect local circumstances and constraints
- The draft guidance calls for flexibility on the application of any development plan requirements relating to the size of market homes, taking into account prevailing market conditions. This could undermine the ability for local plans to set a housing mix policy and ensure that local housing needs are adequately provided for.
- The draft guidance only protects key community facilities where the facility would be the last of its type in that area. The protection of all essential community facilities should be the policy starting point when considering proposals, with relevant criteria included to enable redevelopment only where this is suitable and after an appropriate marketing exercise.
- Whilst all open space and recreation facilities are protected, the draft policy allows loss where there would be equivalent or better provision in terms of quantity and/or quality. Both quantity and quality should be improved because, as written, open spaces could be lost to redevelopment when proposals simply improve other existing spaces.

In summary, we strongly urge the Government to:

- allow local plans greater scope to reflect local constraints and priorities;
- ensure transitional arrangements that do not render emerging plans obsolete;
- provide stronger protections for rural communities, community facilities, open spaces, and sensitive environments;
- retain meaningful influence for neighbourhood planning; and

- ensure more ambitious environmental and climate obligations are fully integrated into the framework.

Yours sincerely

A handwritten signature in black ink, appearing to read 'P Harvey'.

Councillor Paul Harvey
Leader of the Council

A handwritten signature in black ink, appearing to read 'Gavin James'.

Councillor Gavin James
Co Leader of the Council