

# NATIONAL PLANNING POLICY FRAMEWORK CONSULTATION 2026

## Response from the Trees and Design Action Group



The Trees and Design Action Group (TDAG) was founded in 2007 as a not for profit and apolitical collaborative forum to promote best practice in the planning, planting and management of urban trees. TDAG was incorporated as a charitable trust in 2013.

The TDAG model was at the time of creation, and remains today, a unique and effective world leading model.

The group shares the collective vision that the location of trees, and all the benefits they bring, can be secured for future generations through strong collaboration in the planning, design, construction and management of our urban infrastructure and spaces.

The uniqueness of TDAG is that, as an organization, it crosses the boundaries associated with professional disciplines engaging with a wide range of professionals who have an interest in trees and the built environment. They include leading built environment practitioners and developers as well as organisations such as the Forestry Commission, the Woodland Trust, the Tree Council and the Community Forests. No other built environment organization in the UK provides such an effective forum or communicates with such a wide range of disciplines.

The key strength of TDAG is that those taking part in TDAG's work can do so in TDAG's name i.e., a neutral organisation with no commercial agenda influencing its guidance, proposals or actions.

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### TDAG COMMENTS WITH A FOCUS ON TREES AND THE NATURAL ENVIRONMENT

#### OVERALL

The new structure is more logical and the application of the Presumption in Favour of Sustainable Development and the introduction of Spatial Development Strategies offers the potential for a very necessary return to strategic planning at scale.

However, there two major concerns:

1. The NPPF consultation, along with the New Towns Report, the 10 Year Infrastructure Strategy et al has all been published ahead of a National Comprehensive Land Use Framework. The content of the proposed land use framework led by Defra is as yet unknown, but the concern is that it may not be sufficiently comprehensive with the

necessary real time, open source, interoperable data to inform effective interconnected decisions. The Edge Debate has held two round tables on this issue – the summary notes are here:

Round table 1: <https://edgedebate.com/edge-events/edge-roundtable-173-delivering-a-national-land-use-framework>

Round table 2: <https://edgedebate.com/edge-events/edge-roundtable-183-on-the-land-use-framework-8th-april-2025>

2. The document contains measures that impact on nature but those that are intended to protect the natural environment largely roll back existing protections or, at best render them ambiguous, while others place nature at greater risk. This is in spite of England now having one of the world’s most damaged and depleted ecosystems and the recent National Security Assessment of biodiversity loss and ecosystem collapse.  
<https://www.gov.uk/government/publications/nature-security-assessment-on-global-biodiversity-loss-ecosystem-collapse-and-national-security>

## **ANSWERS TO CONSULTATION QUESTIONS**

**Q5: Do you agree with the proposed approach to simplifying the terminology in the Framework where weight is intended to be applied?**

**Partly disagree:**

Nature protection and enhancement, for example, are greatly diminished by the provisions of the NPPF, when taken with the Planning and Infrastructure Act 2026.

**Q6: Do you agree with the role, purpose and content of spatial development strategies set out in Policy PM1?**

**Partly disagree:**

The Development Plans should include strategic infrastructure, but the definition does not include NSIPs and the relationship between SDS-brokered infrastructure and NSIPs should be more clearly defined.

The SDS should have regard to an overarching comprehensive land use framework to frame how infrastructure and proposed and existing land uses will interrelate.

Green Infrastructure (GI) should be included in the list of strategic infrastructure types in SDSs. GI is referred to in the context of local infrastructure later in the draft, but some GI is strategic in function and scale, and this should be acknowledged

**Q44: Do you agree with the approach to climate change adaptation through planning decisions in policy CC3**

**Strongly disagree:**

We support the response from CIWEM that there is a vital need for integrated water management strategies at all scales (which can include the role of trees).

**Q.159 – HC2: Do you agree that Local Green Space should be ‘close’ to the community it serves?**

**Strongly agree.**

The 3-30-300 principle (3 trees visible from every dwelling, 30% tree canopy cover, 300 metres to a local green space) should be applied as policy guidance. How to measure this is available here: <https://treeconomics.co.uk/our-services/3-30-300-rule/>

**Q.164 – HC8: do you agree with the clarification that Local Green Space should not fall into areas regarded as grey belt or where Green Belt policy on previously developed land apply?**

**Strongly agree.**

It is vital not to disturb existing green spaces that may provide established habitats for wild flora and fauna.

**Q.179 – N1: Do you agree that the proposed approach to planning for the natural environment in policy N1, including the proposed approach to biodiversity net gain, strikes the right balance between consistency, viability, deliverability, and supporting nature recovery?**

**Strongly disagree.**

There are too many potential loopholes in the wording. E.g.:

- *'Steer the location of development, including through site allocations, in ways which utilise land of least environmental value where that would be consistent with other policies in this Framework'* leaves open the possibility of overriding vital protections;
- *'This should include limiting the scale and extent of development within protected landscapes'* rather than imply that development within protected landscapes is usually de facto acceptable when it should in fact be the exception;
- *'Minimising harm to designated sites of importance for nature'* implies that it is OK to harm nature at a time when we have become almost the most nature-depleted country in the world;
- *'Areas which could become of particular importance for nature identified in Local Nature Recovery Strategies should be taken into account as opportunities to integrate development with environmental restoration but should not necessarily preclude the allocation of land for development'* is profoundly ambiguous, if not giving carte blanche to destroy what little remains of vital natural resources that should be conserved and enhanced.
- Local Nature Recovery Strategies should be integrated with Natural England's National Green Infrastructure Framework. The Framework should be referenced in the NPPF, not just the Design PPG.

**Q.180 – N1: In what circumstances would it be reasonable to seek more than 10% biodiversity net gain on sites being allocated in the development plan, especially where this could support meeting biodiversity net gain obligations on other neighbouring sites in a particular area?**

All sites should have a baseline of 10% BNG. A higher local level would be desirable where sites had particularly strong potential for BNG and could be included in a Local Nature Recovery

Strategy which would identify them, and/or where the site had potential to create or enhance a biodiversity corridor connecting habitats.

**Q.181 – N2: Do you agree policy N2 sets sufficiently clear expectations for how development proposals should consider and enhance the existing natural characteristics of sites proposed for development?**

**Partly disagree.**

This section is encouraging, but para. N2 1 f takes far too limited a view of the species which are threatened and need support in our massively depleted natural environment. Habitats are complex and species within them are interdependent. E.g., many types of flora depend on pollinating insects and vice versa. Pollinators are highly threatened across England. Natural England should be asked to provide further advice on strengthening this section.

No specific question has been asked of N3: Trees but linked to Q181 above on natural characteristics, while the continued inclusion for new streets to be tree-lined is welcome (and ways of doing this should be illustrated in the DPPP), it is also important on development sites to retain as many healthy, mature trees as possible especially with the need to increase urban tree canopy cover. There is now greater clarity about how to integrate tree roots with new buildings while protecting those tree roots and so, with good design, trees should be considered an essential part of the infrastructure, an asset that adds financial value to developments and quality of places for people and nature. Local planning authorities should be encouraged to have adopted tree strategies along with Local Nature Recovery Strategies.

**Q.182 – N4: Do you agree the policy in Policy N4 provides a sufficiently clear basis for considering development proposals affecting protected landscapes and reflecting the statutory duties which apply to them?**

**Partly disagree.**

The wording in the current NPPF that proposals should be refused in the given circumstances is clearer and less ambiguous.

**Q.183 – N6: Do you agree policy N6 provides clarity on the treatment of internationally, nationally and locally recognised site within the planning system?**

**Partly disagree.**

The wording in the current NPPF that in SSSIs development with an adverse effect should not normally be permitted is clearer and less ambiguous

**SUPPORT FOR OTHER SUBMISSIONS**

The Trees and Design Action Group supports the responses submitted by England's Community Forests, the Edge, CIHT and CIWEM

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