Draft National Planning Policy Framework (NPPF) Consultation (December 2025) – Good Homes Alliance Response

Question 1

Do you have any views on how statutory National Development Management Policies could be introduced in the most effective manner?

National policy already carries significant weight in decision-making. Should statutory National Development Management Policies be introduced, it is essential that they operate as a minimum national baseline, not a ceiling.

Local planning authorities must retain the ability to respond to locally specific circumstances including:

- climate risk
- housing typology
- grid capacity
- demographics and fuel poverty
- health inequalities.

NDMPs should therefore:

- establish minimum expectations
- explicitly allow locally evidenced policies that exceed national standards
- avoid constraining locally justified climate mitigation and adaptation measures.

Question 2

Do you agree with the new format and structure of the draft Framework?

Response: **Neither agree nor disagree**

Separating plan-making and decision-making policies may provide clarity for practitioners. However, the new structure must not reduce the ability of local authorities to exceed national minimum standards.

National policy should clearly state that:

- national standards represent a minimum baseline
- local authorities may adopt more ambitious policies where supported by evidence
- development should demonstrate compatibility with the UK's legally binding carbon budgets.

Question 11

Do you agree with the principles set out in policy PM6(1c), including its provisions for preventing duplication of national decision-making policies?

Response: **Partly disagree**

Avoiding unnecessary duplication is sensible. However, preventing local authorities from setting energy efficiency standards beyond Building Regulations would be highly problematic.

Building Regulations establish minimum national performance requirements. They do not adequately address:

- local climate risks
- fuel poverty conditions
- local carbon reduction pathways
- infrastructure capacity constraints.

Restricting local ambition would conflict with the statutory duty under the Planning and Compulsory Purchase Act 2004 (s.19(1A)), which requires development plans to contribute to mitigation of and adaptation to climate change.

Question 13

Do you agree with the approach to the preparation of plan evidence set out in policy PM8?

Response: **Strongly agree**

Evidence supporting local plans should be proportionate, up to date and clearly linked to policy outcomes.

Collaboration between neighbouring authorities is particularly beneficial for addressing cross-boundary challenges such as:

- climate mitigation strategies
- infrastructure planning
- biodiversity recovery

Shared evidence bases can strengthen policy consistency while reducing duplication of effort and cost.

Question 18

The Good Homes Alliance strongly disagrees with the proposal to restrict Local Planning Authorities from setting local standards beyond Building Regulations.
PM13 would significantly weaken the ability of local authorities to deliver high-performance, low-carbon and healthy homes, undermine statutory climate duties, and restrict innovation that is already occurring across the housing sector.

Through its work with developers, housing associations and local authorities, the Good Homes Alliance sees clear evidence that there is strong ambition across the industry to go further than minimum national standards, particularly in relation to operational energy performance, climate resilience and healthy indoor environments.

Restricting local standards would also weaken efforts to ensure homes are designed to support healthy indoor environments, including good air quality, thermal comfort and resilience to overheating.

If the proposal set out in PM13 is implemented, it will be damaging locally and nationally and will impact residents (especially the most vulnerable):

1. It will prevent Local Authorities from using policy to reduce energy bills for residents (particularly necessary for affordable homes) and deliver other co-benefits (e.g. improved air quality, thermal comfort and healthier indoor environments).
2. It conflicts with Local Authorities' statutory climate change duties, will prevent them meeting local carbon budgets and slow down Local Plan making by causing confusion.
3. It will undermine local democracy and the Government's devolution agenda.
4. It will negatively impact policies across other areas of sustainable development such as embodied carbon, healthy homes and climate change resilience.
5. It would constrain development by reducing Local Authorities' ability to address local issues including grid capacity and energy infrastructure planning.
6. It would reduce community support for development in key growth areas.

We are also concerned about the lack of justification and evidence provided to explain why PM13 is proposed.

A. The impact of PM13 on carbon emissions, equality and health has not been assessed and shared publicly.
B. PM13 states that there is a wide variance in local energy efficiency standards. However, all recently adopted local policies use the same energy metrics, which are also the industry preference due to their transparency and simplicity.
C. There is no evidence that local standards create viability issues or that they affect the delivery of housing.
D. Contrary to the justification used, local energy efficiency standards do not prevent the deployment of energy efficiency measures. In fact, PM13 would be an unnecessary blocker to the innovations already being delivered to decarbonise the construction industry and improve housing quality.

There is a simple win-win alternative to PM13: enable local authorities to adopt an 'optional' standard based on energy metrics. This would be similar to the approach to water efficiency standards already allowed. We would support this alternative.

The Good Homes Alliance works with developers, housing associations, consultants and local authorities across the housing sector to accelerate the delivery of net zero, climate-resilient and healthy homes. Through our research, industry collaboration and published guidance and case studies on healthy, comfortable, high-performance homes, we see strong evidence that there is significant ambition across the sector to go beyond minimum national requirements where viable and appropriate. PM13 risks constraining this ambition and slowing progress already underway across the housing sector.

PM13 introduces significant issues and risks

PM13, if implemented, will be damaging locally and nationally and will impact residents (especially the most vulnerable).

1. PM13 will prevent Local Authorities from using policy to reduce energy bills for residents and deliver co-benefits (e.g. air quality and healthier homes)

The cost of energy has been highly volatile and is unlikely to reduce. Vulnerable populations, particularly those with health conditions, are disproportionately less able to pay for energy to meet their daily needs.

While the Future Homes Standard is expected to mark a shift away from fossil fuel heating, local authorities should retain the ability to test its efficiency outcomes against locally specific factors. In particular, when it is viable to do so, local authorities should be able to set higher energy efficiency standards which will also have co-benefits such as improved indoor air quality, better thermal comfort and reduced overheating risk.

These factors are increasingly recognised as essential to delivering healthy homes that support occupant wellbeing and long-term housing quality.

Without this lever local authorities will be prevented from using policy to help residents reduce energy costs and address local air pollution issues, beyond Building Regulations (a minimum performance requirement set at the national level without considerations of specific social and environmental circumstances, including vulnerability to fuel poverty and local air-quality pressures).

Where it can be proven locally that higher standards are viable and feasible for developers it should be possible to dramatically ease the cost-of-living pressures for UK citizens. Our analysis suggests that this could save £240 a year for residents living in semi-detached houses.

The Good Homes Alliance has consistently promoted fabric-first approaches and measurable operational energy targets, and our work with industry partners demonstrates that high-performance building fabric and low-carbon design can deliver homes that are more comfortable, affordable to run and healthier for occupants.

2. PM13 conflicts with Local Authorities' statutory climate change duties, will prevent them meeting local carbon budgets and slow down Local Plan making by causing confusion

The December 2025 consultation draft NPPF states that one purpose of the planning system is to "mitigate and adapt to climate change". The consultation document lists key national policies that support the transition to net zero and ensure resilient development:

- CC2 Mitigation of climate change
- CC3 Adaptation to climate change
- S1 Positive plan-making
- DP3 Key principles for well designed places

As drafted, PM13 prevents LPAs from fulfilling their legal duties. It states that "quantitative standards set through development plan policies should be limited to infrastructure provision,

affordable housing requirements, parking" and "not cover matters which are already addressed by Building Regulations."

As drafted, it does not align with or support the wider NPPF purpose and is inconsistent with the Government's Design and Placemaking Planning Practice Guidance, which places stronger emphasis on addressing climate change impacts.

While the Climate Change Act does not legislate sectoral limits, all sectors must significantly reduce emissions. Analysis supporting the 6th and 7th Carbon Budgets shows that the buildings sector will need to reach close to zero carbon in the 2040s without offsetting.

A number of Local Authorities have Net Zero targets ahead of the national 2050 target and PM13 would remove their ability to influence the performance of new homes.

Members of the Good Homes Alliance Local Authority Network are already developing policies and evidence bases to support higher-performance homes aligned with local net-zero strategies. PM13 would significantly limit their ability to implement these locally justified policies.

Local authorities have been undertaking analysis based on national Carbon Budget information. A growth study undertaken in Greater Cambridge compared the expected FHS performance with an emerging net zero operational performance standard based on high-performance fabric and on-site renewable energy generation. A PM13-compliant approach would lead to a 15–22% exceedance for new homes, whether assessed against a 2030 or 2050 target.

Parliament has placed a clear legal duty on Local Planning Authorities through the Planning and Compulsory Purchase Act 2004 (s.19(1A)) to ensure development plans secure mitigation of, and adaptation to, climate change.

3. PM13 will undermine local democracy and the Government's devolution agenda

Where local policies are to receive 'very limited weight' it goes against devolution and regional planning.

In the English Devolution White Paper (December 2024) the Deputy Prime Minister wrote:

"If we are going to build an economy that works for everyone, we need nothing less than a completely new way of governing – a generational project of determined devolution."

This includes functions in housing, strategic planning and environment and net zero policy.

4. PM13 will negatively impact policies across other areas of sustainable development such as embodied carbon, healthy homes and climate change resilience

Several additional sustainable development factors require local quantification and PM13 risks constraining these policies despite their contribution to viable net zero pathways.

Embodied carbon is a major unregulated contributor to emissions. Many local authorities already require the reporting of embodied and whole life carbon to increase material efficiency, drive the development of low carbon materials and deliver proven cost efficiencies.

Managing overheating in homes also requires region-specific, metric-based approaches that prioritise passive design before mechanical cooling. The Good Homes Alliance has undertaken significant work on overheating and climate-resilient housing design, highlighting the importance of design-stage interventions such as shading, ventilation and building orientation to maintain comfortable and healthy indoor environments.

Waste management and circularity policies could also be at risk. These policies encourage retrofit, material reuse, recycled content and design for disassembly, delivering clear health, economic and environmental benefits.

Embodied carbon, overheating and circular economy objectives cannot be delivered through Building Regulations alone. They rely on local policy tools that PM13 would constrain.

5. PM13 would constrain development by reducing Local Authorities' ability to address local issues including grid capacity and infrastructure investment

Planning for new homes and decarbonisation are inherently linked to local infrastructure capacities.

The local grid must support increasing demands from buildings, industry and electric vehicles. Local Area Energy Planning and Local Plan Policy can identify these issues and plan for energy efficient homes and renewable electricity generation.

There is already evidence of severe grid constraints in parts of the UK temporarily pausing new connections.

A local approach to energy standards recognises regional variation in housing typologies, densities, climates, demographics, viability and supply chains.

6. PM13 would reduce community support for development in key growth areas

Energy efficient homes and developments are more popular with local communities and home buyers because of the benefits they bring in terms of reduced carbon emissions, better health outcomes, improved indoor environments and lower running costs.

High-performance homes also improve comfort, reduce overheating risk and support healthier indoor environments.

Net zero developments typically garner more support from the local community. In areas where there may be objections to increased development, such as in Growth Areas, this additional support can be valuable in supporting the streamlined delivery of more homes.

PM13 would negate this support by homogenising the requirements to a single national minimum standard.

Lack of justification and evidence

A. The impact of PM13 on carbon emissions, equality, health and biodiversity has not been assessed and shared publicly.

B. PM13 references wide variance in energy efficiency standards; this is not the case with recently adopted local policies. The metrics match those recommended by the Climate Change

Committee and those incorporated into the industry-backed UK Net Zero Carbon Buildings Standard. The development of this standard demonstrates that the sector is already aligning around consistent, measurable performance metrics for low-carbon buildings and homes.

C. There is no evidence that local standards create viability issues or that they affect the delivery of housing.

D. Local energy efficiency standards and policies supporting sustainable development are proven to drive innovation, upskilling and economic growth.

Where justified and viable, Local Authorities should be able to adopt an optional Zero Carbon Homes policy for new housing.

This optional standard could include requirements such as:

- Space Heating Demand limits
- Energy Use Intensity targets
- Upfront embodied carbon limits

Such an approach would enable consistency while allowing local authorities to respond to local climate goals, infrastructure constraints and housing needs.

Given the strong appetite across the housing sector to deliver high-performance, low-carbon homes, reflected in the work of the Good Homes Alliance and its members, enabling rather than restricting local ambition would support innovation, skills development and the scaling up of high-quality **housing delivery.**

We would strongly support this alternative.

Question 19

Do you agree with the principles set out in policy DM1?

Response: **Strongly agree**

A proportional approach supports SME developers.

SMEs are often leading innovation in sustainable housing and high-performance building design, as demonstrated by developers in the GHA membership. Clear and predictable sustainability expectations are essential to support investment in better-performing homes.

Question 20

Do you agree with the policy DM2 on information requirements for planning applications?

Response: **Partly disagree**

Proportionality is appropriate.

However climate-related risks such as overheating, flooding and energy performance require robust assessment regardless of scheme size.

Major residential developments should include:

- whole-life carbon assessment
- overheating risk modelling
- operational energy modelling.

Question 42

Do you agree with the approach to planning for climate change in policy CC1?

Response: **Partly disagree**

Recognition of climate change mitigation within planning policy is welcome.

However the policy should explicitly require **whole-life carbon assessment**, including embodied emissions associated with construction materials and building processes.

Planning decisions strongly influence these emissions through:

- structural design
- material selection
- building reuse versus demolition.

Question 43

Do you agree with the approach to mitigating climate change through planning decisions in policy CC2?

Response: **Partly disagree**

while we are supportive of the principal and general approach taken in policy CC2 it needs to be strengthened.

It should be strengthened by:

- requiring whole-life carbon assessment for major developments
- prioritising fabric-first energy efficiency
- encouraging post-occupancy performance monitoring
- supporting on-site renewable energy generation.

Operational energy performance should be assessed using measurable metrics such as energy use intensity and space heating demand.

PM13 is also in conflict with this approach, a further reason why PM13 is not supported and needs to be changed to allow for us to set higher standards where we have the evidence to support that it is technically feasible and viable to do so.

Question 44

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

Response: **Strongly agree**

Climate adaptation is essential to ensure homes remain safe and comfortable under future climate conditions.

Policy CC3 should emphasise:

- overheating risk assessments using future climate projections
- passive cooling strategies
- urban greening and tree canopy
- sustainable drainage systems.

Passive design measures should be prioritised before reliance on mechanical cooling.

Question 97

Do you agree with the amendments to current Framework policy on planning for renewable and low-carbon energy development in policy W2?

Response: **Strongly agree**

Accelerating renewable energy deployment is essential for:

- decarbonising electricity supply
- enabling electrification of heat in homes
- improving long-term energy security.

Question 98

Do you agree with the proposed approach to supporting development for renewable and low-carbon energy in policy W3?

Response: **Partly disagree**

Renewable energy should be recognised as a core component of sustainable development.

Policy should also encourage:

- rooftop solar on new housing
- community energy schemes
- integration with Local Area Energy Planning.

Question 99

Do you agree with the proposed approach to supporting development for water infrastructure in policy W4?

Response: **Partly disagree**

Water efficiency is an important element of climate resilience.

Policy should recognise regional variation in water stress and allow higher water efficiency standards where necessary.

Rainwater harvesting and water reuse systems should also be encouraged.

See GHA guide for reference https://kb.goodhomes.org.uk/guidance/water-efficiency-and-reuse-in-housing/

Question 146

Do you agree policy DP1 provides sufficient clarity on how development plans should deliver high quality design and placemaking outcomes?

Response: **Strongly agree**

Design quality should address:

- energy efficiency
- climate resilience
- biodiversity
- material efficiency
- long-term adaptability of homes.

Question 147

Do you agree with the approach to design tools set out in policy DP2?

Response: **Strongly agree**

Design codes should include measurable environmental criteria including:

- energy performance metrics
- overheating mitigation https://goodhomes.org.uk/overheating-in-new-homes
- water efficiency
- biodiversity enhancement.

Question 121

Do you agree policy L3 provides clear guidance on achieving appropriate densities for residential and mixed-use schemes?

Response: **Partly disagree**

Higher densities should not compromise:

- daylight access
- ventilation
- access to green space
- https://goodhomes.org.uk/overheating-in-new-homes risk.

Question 165

Do you agree with the approach to planning for healthy communities in policy HC1?

Response: **Strongly agree**

- Planning policy should ensure development supports healthy communities.

- Indoor environmental quality in homes should be recognised as a key determinant of health, including:
- ventilation
- overheating prevention
- daylight access
- moisture and mould prevention.

Question 193

Do you have any further thoughts on the policies outlined in this consultation?

Homes built today will determine energy costs, carbon emissions and health outcomes for decades.

The planning system therefore has a critical role in ensuring new housing is:

- low-carbon across its lifecycle
- energy efficient and affordable to run
- resilient to climate change
- healthy and comfortable to live in.

The NPPF should explicitly recognise:

- whole-life carbon assessment
- healthy homes principles
- climate resilience
- circular economy approaches in construction.

Strengthening these elements will help ensure that homes built today remain sustainable, affordable and healthy for generations to come.