

NPPF (August 2026): Key Changes for Neighbourhood Plans

Summary for Harberton Neighbourhood Plan Steering Group — October 2026

The revised National Planning Policy Framework (NPPF) was published on 17 August 2026, replacing the December 2024 version, and applies immediately to decision-making. It is a significant structural change: the previous numbered-paragraph format has been replaced by a set of named policies (referenced as S1, S2, S3 etc.), so guidance below is given by policy reference rather than paragraph number.

1. Presumption in favour restructured

The old "tilted balance" (formerly paragraph 11) has been replaced by a permanent presumption in favour of sustainable development, split across:

- Policy S3— directs decision-makers to S4 or S5 depending on site location.
- Policy S4 – sites within settlement boundaries: a "default yes," refused only if adverse effects substantially outweigh the benefits.
- Policy S5 – sites outside settlements: presumption applies only to specified categories (e.g. brownfield, well-connected sites), not a general default yes.

2. Neighbourhood plan protection — Policy S6

This is the key safeguard for neighbourhood plans. Where a proposal conflicts with a neighbourhood plan that:

- was adopted within the last 5 years, and
 - contains active housing allocations meeting its identified housing requirement,
- then the adverse effects of the conflicting development are likely to substantially outweigh the benefits — effectively protecting the plan from being overridden by S3–S5, even where those policies would otherwise favour approval.

3. Weight given to plan policies generally (Annex A)

Separately from S6, any development plan policy (including neighbourhood plan policies) that is materially inconsistent with the new national policies is to be given only very limited weight — unless the policy was itself adopted/examined against the August 2026 Framework. Transitional arrangements for plans at an advanced stage are set out in Annex A.

4. Important gap: plans unable to allocate for legitimate reasons

Policy S6's protection is conditional on housing allocations existing. A neighbourhood plan that has not allocated housing sites — including where this is because no suitable land is available in the area — does not meet the S6 test and therefore does not benefit from this specific safeguard, regardless of the reason.

This is a recognised gap, but it's worth noting what the Government has actually committed to. In its formal response to the NPPF consultation (Question 41), the Government confirmed it is not introducing any exemption or alternative test for plans that cannot allocate — it is taking forward the policy approach in policy S6 without further substantive change and does not propose to introduce alternative tests of policy status or additional flexibility. What it has committed to is narrower: Planning Practice Guidance will be updated to provide further clarity and support, including on preparing site allocations and addressing capacity constraints. A related commitment at Question 48 promises PPG clarity on "neighbourhood plan preparation, including site allocations and the consideration of local housing need, and on collaborative working between LPAs and neighbourhood planning groups.

In short: the promised guidance is aimed at helping groups prepare allocations, not at protecting plans where allocation genuinely isn't possible because no suitable land exists. There is no confirmed commitment yet to address that specific scenario.

As of early September 2026, this PPG update has not been published— the relevant PPG page ("Neighbourhood planning") remains dated 25 September 2020, unchanged since well before either the December 2024 or August 2026 NPPF.

Source: MHCLG, Government response to the proposed reforms to the National Planning Policy Framework and other changes to the planning system consultation (August 2026), Chapter 4, Questions 41 and 48:

https://assets.publishing.service.gov.uk/media/6a82fcec3bd75b81e2329a89/National_Planning_Policy_Framework_consultation_-_government_response.pdf

5. Design codes and character policies — a separate, still-available safeguard

Even without housing allocations (and without S6 protection), our plan's design code and character/settlement policies are not affected by this gap — they sit on a different footing:

- They remain part of the statutory development plan regardless of allocation status, and are weighed under the ordinary S3–S5 process, not S6.
- They are unlikely to be caught by the Annex A "very limited weight" rule, since the August 2026 Framework actively supports local design codes (its design chapter, and Policy PM5, explicitly confirm neighbourhood plans can set design requirements/codes). If our code is examined and adopted against the August 2026 Framework, Annex A's discount doesn't apply to it at all, whatever the age of the rest of the plan.
- Design is one of the few things that can genuinely challenge the S4/S5 presumption: conflict with an adopted design code can amount to the "substantial adverse impact" needed to refuse, rather than being just one factor weighed thinly against housing need.

Practical implications for our plan.

If we can't allocate, a robust, evidenced design code examined against the current Framework will provide potential safeguards, since it doesn't depend on allocation status.

If we are unable to allocate housing sites, S6 will not protect us, and based on the Government's own response we should not expect a future policy fix for this. The plan will be subject to the ordinary S3–S5 weighing exercise, like any other development plan policy. A clearly evidenced, reasoned policy explaining why allocation isn't possible strengthens our position even without formal S6 protection along with a robust Design code.

*Sources: MHCLG, NPPF (August 2026); Local Government Association briefing, 27 August 2026; GOV.UK Planning Practice Guidance collection (checked September 2026).

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