

SEG response to the Govt's consultation on changes to the National Planning Policy Framework (NPPF) Consultation (Dec 2025 to Mar 2026)

Sent 7th March 2026 by email to PlanningPolicyConsultation@communities.gov.uk

To: Planning Policy Consultation Team
Planning Directorate – Planning Policy Division
Ministry of Housing, Communities and Local Government
Floor 3, Fry Building
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Question 38: Do you agree to the proposed approach to development within settlements?

SEG Answer: **Strongly disagree.**

If the proposed and, to be honest, undemocratic changes to the NPPF with the new policy S5(1)(j) are adopted by the Government, i.e. "development should be approved outside settlements", if no five-year housing land supply or below 75% Housing Delivery Test, then Local Planning Authorities that are unable to demonstrate a five-year housing land supply or meet the 75% Housing Delivery Test would lose the ability to refuse and thereby prevent speculative housing outside settlements. Yet that five-year housing calculation is based, for example, on a doubling of the housing target for BaNES Council, is undeliverable within the Government's unrealistic target deadlines due to the national shortage of construction workers thus allowing developers to pick and choose where they can most profitably build homes, not where they are genuinely needed, but where the profit margins are greatest for the developer, i.e. green field sites in the Green Belt regardless of the impacts on the existing community or what a local community actually needs, wants and seeks.

The current Government will be highly criticised by existing and future generations for weakening the protection of Green Belt from development yet again, especially when it is well proven that it is not necessary to destroy our countryside, parks and nature including wildlife habitats, to provide the homes we need as 'Homes for Everyone' can testify at <https://homesforeveryone.org/>.

Furthermore, SEG is concerned that, for policies S4 (Principle of development within settlements) and S5 (Principle of development outside settlements) or indeed any of the proposals that affect the Green Belt, there is no evidence in the proposed policies that the Government has followed its statutory duty to "have due regard" to the Environmental Principles Policy Statement (EPPS, November 2023) and therefore undertake its obligation to consider the impact its policies will have on the environment that came into effect on 1st November 2023 and remains in force.

The EPPS covers five environmental principles set out in law that are:-

- the integration principle (that environmental protection be integrated into the making of policies);
- the prevention principle;
- the precautionary principle;
- the rectification of environmental damage at source principle; and
- the polluter pays principle.

For the purpose of SEG's response to the NPPF consultation, the EPPS (and as defined in the Environment Act 2021 section 45), "environmental protection" means:-

- protection of the natural environment from the effects of human activity
- protection of people from the effects of human activity on the natural environment
- maintenance, restoration or enhancement of the natural environment
- monitoring, assessing, considering or reporting on anything in paragraphs (a) to (c).

Question 133: Do you agree with proposals to better enable development opportunities around suitable stations to be brought forward? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. Please provide your reasons, particularly if you disagree.

SEG Answer: **Strongly disagree.**

Salford Environment Group (SEG) is strongly opposed to the proposed changes to Green Belt policy contained in draft policy GB7 to allow more development on the simplistic single measure that it is close to a railway station. In practice this will create more sprawling urban development and increased car usage, as there is no guarantee that the development would be in or next to an existing town or city location with the necessary social facilities and other transport infrastructure. It would be a direct contradiction to policy GB5 on beneficial uses of Green Belt land, as building on land near stations would lead to the loss of open countryside that would be easiest for people from towns and cities to reach by train.

Of equal concern to SEG is that this simplistic approach to planning policy would create a very strong disincentive for communities like Salford to seek the re-opening of its closed local railway station. In fact, the desire of the community for a re-opened station in Salford has been greatly weakened once knowledge of this policy change was announced and become more widely known. Even Salford Parish Council changed its policy stance on re-opening Salford station in March 2025 after the Chancellor of the Exchequer ill-advisedly and seemingly without taking professional planning advice, announced "a new approach to planning decisions on land around stations, changing the default answer to yes."

This is a huge loss to public confidence in planning policy being driven by the Government with its proposals for the NPPF, taking a "Government knows best" and "one-size-fits-all" approach to planning policy rather than by what a local community needs, wants and seeks.

In rural villages that have already reached or passed the maximum peak of development this is such a negative proposal. For example, in Saltford's case, there has been a 100+% increase in the size of the village since the early 1950s with no new transport infrastructure, and where the re-opening of the local railway station could usefully help to overcome existing problems of road congestion due to past over-development of the area and insufficient public transport.

In summary, solving one problem, an absence of an alternative to travel by road, by creating another problem, overdevelopment of an area with resulting additional burden on local infrastructure, and loss of highly valued Green Belt or open landscapes with their wildlife habitats, would be counterproductive in many circumstances and have a negative effect on local communities who need these spaces for their health and well-being.

A policy that encourages more housing development on previously developed or brownfield land close to railway stations in towns would, however, be welcomed as this would help regenerate existing towns.

To destroy the rural nature of rural villages by forcing new housing developments on their rural landscape including the farmland that underpins the nation's food security (that is already under severe threat) would be reckless and irresponsible.

Question 136: Do you agree policies GB6 and GB7 [*develop near railway stations*] set out appropriate tests for considering development on Green Belt land? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. Please provide your reasons, particularly if you disagree.

SEG Answer: **Strongly disagree.**

Saltford Environment Group (SEG) strongly disagrees with the proposals affecting Green Belt policy contained in draft policy GB7 to allow more development on the basis that it is close to a railway station. Creating more sprawling suburban development and increased car usage, with no guarantee that the development would be in or next to an existing town and connected social facilities would represent poor town planning.

The proposed inclusion of policy GB7 h (i), that the new development "be within a reasonable walking distance of a railway station capable of providing a high level of connectivity to services and employment" is welcome as a safeguard, although no definition of "reasonable walking distance" is provided. Furthermore, this does not take account of the impact of station users arriving by car from out-lying towns and villages and the additional traffic congestion and park-and-ride implications for existing residential and main roads near the station.

Policy GB7 would also contradict policy GB5 on beneficial uses of Green Belt land, as building on land near stations would lead to the loss of open countryside in rural villages like Saltford whilst adding to road traffic in the general vicinity of the existing community and the new development itself.

SEG prefers a more common-sense approach to land use planning and would, therefore, support a policy that encourages housing development on previously developed land close to railway stations in towns and cities, as this would help regenerate existing towns and cities whilst protecting the nearby countryside which benefits rural and town/city dwellers alike.

Question 145: Do you agree that proposed changes to the grey belt definition will improve the operability of the grey belt definition, without undermining the general protections given to other footnote 7 areas? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

SEG Answer: **Strongly disagree.**

Salford Environment Group (SEG) agrees with the important concerns raised by CPRE and others about the 'grey belt' provisions introduced into Green Belt policy in the December 2024 NPPF. Despite claims made by the Prime Minister and other Government Ministers that the policy would only lead to the loss of supposedly 'poor quality' Green Belt land, we are aware from CPRE research findings that government planning inspectors have used the policy to permit development on high quality farmland and recognised local wildlife sites.

This seriously undermines the frequent senior Ministerial statements that the Government is taking a "brownfield first" approach to development in its planning policies, when clearly it is not. In particular, the Grey Belt definition of "land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in policy GB2" is likely to be harmful to communities. It will encourage development that is greenfield, not brownfield through speculative planning applications from developers.

Furthermore, SEG agrees with Salford Parish Council that there is no single, statutory legal definition of a "town", which means there is ambiguity on the protections of purposes (a), (b) or (d) in policy GB2 for large and historic rural villages like Salford that are larger than many towns. For this reason, SEG supports the sensible request from Salford Parish Council that the definition of towns should be amended to "include large villages near towns that in themselves help to prevent the merging of neighbouring towns with the villages in their vicinity thus preventing an urban sprawl and increasing road congestion through incremental developments".

In view of the above, we therefore support the CPRE's request that 'grey belt', rather than being widened, should be removed from national planning policy, with major development only being allowed in the Green Belt if it is agreed through the new spatial development strategies.

But if the grey belt policy is to be maintained, it should be narrowed to exclude high-quality farmland (or lower quality farmland that has the potential for future food production, grazing

or eco-system support for neighbouring farmland) and local wildlife sites from being designated as grey belt.

Furthermore, and this is crucial to prevent developers rather than communities who have to live with the consequences of poor planning decisions driven by profit rather than genuine need, making the decision on where new housing developments should be built.

There must be democratic protection of local planning decisions. So called “grey belt development” should not be allowed on appeal to the Secretary of State against local refusals of planning permission to protect the local democratic wishes and need for open green space for the health and well-being of communities as represented by their Local Planning Authority and Town/Parish Council.

www.saltfordenvironmentgroup.org.uk

7 March 2026

Footnote:

HMG consultation (deadline 10.3.2026) at

<https://www.gov.uk/government/consultations/national-planning-policy-framework-proposed-reforms-and-other-changes-to-the-planning-system/national-planning-policy-framework-proposed-reforms-and-other-changes-to-the-planning-system>