

MHCLG consultation on National Planning Policy Framework: proposed reform and other changes to the planning system

March 2026

About the Institute of Chartered Foresters (ICF)

The Institute of Chartered Foresters is the Royal Chartered body for foresters and arboriculturists in the UK. We represent over 2,300 members working across forestry, arboriculture, and related disciplines in the private and public sectors, academia, and research institutions. Our mission is to uphold professional standards, provide guidance, and support sustainable management of trees and forests.

Acknowledgement of Consultation

We appreciate the opportunity to respond to this consultation and recognise its importance in shaping policy. We support the overarching objectives of evidence-based policymaking and integrated approaches to land and resource management. Where relevant, we advocate collaboration across sectors to ensure holistic outcomes that benefit society and the environment.

The ICF has not submitted a response via the Citizen Space portal but requests that the Planning Policy Consultation Team accepts this statement as our response. This statement has been produced in consultation with our membership.

Position Statement

Overall, while we welcome several positive proposals within the consultation, we remain concerned that the reforms collectively risk weakening environmental protections, limiting local ambition and slowing progress toward national climate and nature recovery commitments. A more holistic and integrated approach to sustainable placemaking is needed, one that recognises the interconnected benefits of well designed communities, sustainably constructed homes, effective water and soil management, sustainable transport, community spaces, waste and recycling provision, and high-quality green infrastructure. These elements underpin national health, climate resilience, environmental recovery and long-term prosperity.

National minimum standards aligned with net zero trajectories can give industry certainty, but local authorities must retain the ability to set evidence based, ambitious policies that drive innovation and accelerate progress, particularly in areas like embodied carbon, overheating and climate adaptation. Without this local leadership, national climate goals become unattainable.

We also stress the importance of skills, expertise and robust assessment. While we support a brownfield first approach, brownfield sites can hold significant biodiversity and community

value. Expert-led ecological, tree and landscape assessments must therefore inform development decisions, and local authorities must be resourced to access relevant specialist expertise.

Finally, restricting local powers on energy efficiency may reduce economic opportunities associated with scaling low carbon technologies, lock in higher emissions for decades and create costly future retrofit challenges. The proposed changes to flood-risk policy also underestimate long-term climate costs and fall short of the precautionary, nature based, resilience focused approach required.

This consultation therefore risks missing opportunities to support sustainable placemaking, resilient communities and a low carbon--built environment. We urge Government to ensure reforms strengthen, not dilute, climate ambition, environmental stewardship and holistic planning practice.

As part of this response, we emphasise the critical importance of:

- Embedding the UK Forestry Standard (UKFS) within the NPPF as the benchmark for sustainable forestry practice.
- Requiring design codes to support greater use of home-grown timber in line with the Timber in Construction Roadmap.
- A Supplementary Planning Guidance Template enabling a clear, consistent ‘presumption in favour of approval’ for forestry-related planning applications that demonstrate UKFS compliance.
- Strengthening climate-related sections of the NPPF, removing loopholes that allow dismissal of woodland creation as ‘not relevant’, and ensuring clear definitions of climate-resilient tree planting.
- Ensuring wildfire adaptation measures are based on specialist expertise and do not become a justification for avoiding tree planting.

Response – answered questions

Question 30

Do you agree that policy DM7 clarifies the relationship between planning decisions and other regulatory regimes? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

The ICF partly disagrees. The planning system continues to demonstrate a weak alignment with the requirements and sustainable landuse objectives of forestry. The revised policy should explicitly state that a more supportive approach must be taken toward forestry related development proposals that are accompanied by a Forestry Commission approved felling licence and/or a Forestry Commission approved Woodland Management Plan. These documents provide assurance of compliance with the Forestry Act and the UK Forestry Standard (UKFS), confirming that the statutory forestry authority considers the proposed land use lawful and sustainably managed.

Question 39

Do you have any views on the specific categories of development which the policy would allow to take place outside settlements, and the associated criteria? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

The ICF partly disagrees. The revised policy should explicitly refer to the creation of a Supplementary Planning Document (SPD) or template that sets out the criteria and circumstances under which a 'presumption in favour of development' can be applied to planning applications from woodland owners and forestry businesses, many of which fall outside settlement boundaries. Such guidance would help reduce the barriers these land managers frequently encounter when seeking consent to manage or restore woodlands.

Question 42

Do you agree with the approach to planning for climate change in policy CC1? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

The ICF strongly agrees. Planning must embed climate-aligned land use with trees and woodlands central to mitigation (sequestration and material substitution) and adaptation (cooling, flood management, soil protection, biodiversity and resource resilience). NPPF should reference the UK Forestry Standard (UKFS) as the benchmark for woodland creation/management (e.g. demonstrated by having a Forestry Commission approved felling licence or Woodland Management Plan in place) and ensure LNRS are implemented with professional forestry input.

Key asks: (1) Embed UKFS in policy and conditions; (2) Resource local authority capacity to access chartered forestry expertise; (3) Align plan policies with LNRS so woodland creation and restoration deliver both climate and nature outcomes.

Question 43

Do you agree with the approach to mitigating climate change through planning decisions in policy CC2? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

The ICF partly agrees; strengthen policy. Require decision-makers to favour nature-positive land uses (woodland creation, riparian buffers, agroforestry) where these deliver measurable carbon and biodiversity gains, and to apply UKFS where woodland is conditioned. Address capacity gaps by mandating access to professional forestry expertise in planning authorities to ensure robust carbon assessments and long-term management.

Additional measures: (i) Explicit cross-reference to UKFS for any woodland creation/management via planning; (ii) Require whole-life carbon statements that recognise substitution benefits of home-grown timber; (iii) Secure long-term management via conditions or legal agreements with professional oversight; (iv) Ensure alignment with LNRS opportunity mapping.

Question 44

Do you agree with the approach to climate change adaptation through planning decisions in policy CC3? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

The ICF strongly agrees. Adaptation should require species, provenance and structural (age) diversity, resilient seed origins, riparian woodland and shelterbelts, and soil protection—planned and verified by professional foresters to UKFS. Local plans should include forest resilience strategies (pests, disease, drought, fire) and promote multi-functional green infrastructure using trees to cool streets, reduce runoff and improve health.

Question 45

Does the policy on wildfire adaptation clearly explain when such risks should be considered and how these risks should be mitigated? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

The ICF agrees. Clarify triggers for Wildfire Risk Assessment on developments adjoining or within 1 km of significant woodland/heath. Require defensible space design, access for emergency services, and management plans addressing fuel loads and drought stress. Professional forestry input should guide species selection, thinning, and edge design to reduce ignition potential while maintaining ecological value.

Question 46

How should wildfire adaptation measures be integrated with wider principles for good design, and what additional guidance would be helpful?

Integrate wildfire measures with design codes and landscape frameworks: specify fire-resilient planting, surface materials and access; maintain shaded fuel breaks and managed woodland edges; and require management plans reviewed by qualified forestry professionals. Provide national guidance drawing on climate-oriented forest management principles and UK experience.

Question 47

Do you have any other comments on actions that could be taken through national planning policy to address climate change?

The new NPPF must reference the Government's Timber in Construction Roadmap and require design codes to specify new development applications include greater volumes of home grown (UK-sourced timber).

Question 82

Are any more specific approaches or definitions needed to support the delivery of very large (super strategic) sites, including new towns? Yes, no

Yes - larger developments are a great opportunity to implement the Government's Timber in Construction Roadmap. Design codes for such developments must specify that new development applications include greater volumes of home grown (UK-sourced timber).

Question 87

Do you agree with the approach to rural business development in policy E4? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

The ICF partly disagrees. The revised policy should explicitly refer to the creation of a Supplementary Planning Document (SPD) or template that sets out the criteria and circumstances under which a 'presumption in favour of development' can be applied to planning applications from woodland owners and forestry businesses, many of which fall outside settlement boundaries. Such guidance would help reduce the barriers these land managers frequently encounter when seeking consent to manage or restore woodlands.

Question 147

Do you agree with the approach to design tools set out in policy DP2? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

The ICF partly disagrees. The revised policy should reference the Government's Timber in Construction Roadmap and require design codes to mandate that new development applications incorporate greater volumes of homegrown (UK sourced) timber. We are concerned that relaxing the legal requirement for design codes would significantly reduce the likelihood that such codes are produced and effectively implemented.

Question 149

Do you agree with the proposed approach to using design review and other design processes in policy DP4? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

The ICF partly disagrees. The revised policy should reference the Government's Timber in Construction Roadmap and require design codes to mandate that new development applications incorporate greater volumes of homegrown (UK sourced) timber. We are concerned that relaxing the legal requirement for design codes would significantly reduce the likelihood that such codes are produced and effectively implemented.

Question 179

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 agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

The ICF strongly agrees. National planning policy should explicitly recognise that professionally and sustainably managed woodlands deliver nature recovery, socioeconomic benefits, and climate outcomes in combination. The UKFS should be embedded as the benchmark for sustainable land use in all woodland related planning conditions and any planning applications required for forestry purposes. Local Nature Recovery Strategies (LNRS) should guide the prioritisation of woodland creation and restoration, including productive forestry that supports habitat provision and reduces the UK's reliance on imported timber.

Question 180

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?

>10% BNG is reasonable where: (a) LNRS identifies woodland opportunity zones or connectivity gaps; (b) allocations can create/expand resilient woodland networks (Lawton principles); (c) riparian or urban canopy projects can deliver significant multi-benefit uplift; and (d) professional assessments show durable habitat gains supported by long-term management.

Question 182

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? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

The ICF agrees. Apply great weight to conserving and enhancing protected landscapes while enabling well-designed woodland creation, restoration and management consistent with landscape character. Provide clearer guidance to National Parks/AONBs on integrating woodland creation, habitat restoration and timber production within a Land Use Framework, delivered to UKFS.

Closing remarks

We stand ready to support Government with further evidence and professional insight. We thank all members who have contributed to developing this response.