

# Briefing: Sustain response to proposed changes to the National Planning Policy Framework

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Proposed changes to the National Planning Policy Framework (NPPF) risk making it easier for large-scale intensive livestock units to expand in rural areas, despite the risk they pose to UK food security, water and air pollution, biodiversity loss and animal welfare. Sensible adjustments to the draft NPPF will unlock the potential of sustainable farming, building the essential resilience the UK needs in the face of global instability, creating more and better jobs and increasing the production of healthy food.

## Introduction

This briefing was written by Sustain: the alliance for better food and farming. Sustain advocates for food and farming policies and practices that enhance the health and welfare of people and animals, improve the working and living environment, enrich society and culture, and promote equity. Sustain is an alliance of around 100 UK civil society organisations, collectively working towards a more sustainable, fair and just food system.

Updating the National Planning Policy Framework (NPPF) presents an opportunity to empower local authorities to support a thriving and diverse local food system and sustainable development through agroecological farming. We are concerned that the draft updated NPPF fails to recognise a fundamental constraint: meeting the UK's legally binding climate and nature recovery targets and protecting national security and prosperity requires structural change in the way we farm and eat. Government carbon budgets and advisory pathways are clear that demand-side change in food systems is necessary, yet the Framework embeds a presumption that intensive agricultural and livestock development should continue to expand.

### Intensive agriculture is:

- A major source of greenhouse gas emissions and driver of biodiversity loss
- A significant contributor to water, soil and air pollution

- Dependant on imports from geopolitically unstable regions
- Reducing the number, variety and quality of jobs in rural communities

Planning policy cannot treat this sector as environmentally and socially neutral while the same Framework aims to support climate mitigation, sustainable development and nature recovery.

## Five proposed policies are of concern: S5, E2, E4, DM7 and PM6.

1. **Policy S5: This policy introduces a presumption to approve applications for new developments “unless the benefits would be substantially outweighed by any adverse effects”.**

**Analysis:** This policy creates significant scope for the approval of high-carbon, polluting, water intensive developments. The requirement for adverse impacts to “substantially” outweigh benefits places a heavy evidential burden on planning authorities and the community to demonstrate these effects. This is problematic because evidence shows that intensive livestock applications routinely don't set out key adverse impacts (e.g. legally required information on climate impacts).

The policy also fails to reference the need to take into account other polluting developments in the area when determining whether a development is appropriate. Nutrient loading, air pollution and water contamination accumulate over time and space, particularly in nutrient-sensitive catchments. The failure of a planning authority to consider the impacts of existing pollution sources was central to Shropshire Council losing a legal challenge last year, resulting in an overturned planning decision and substantial costs.

**Recommendation:** The burden should be on applicants to prove they are contributing to government targets to recover nature, radically reduce climate emissions and use water sustainably. This policy should read, for example:

- There should be a presumption against developments that are likely to lead to an increase in nutrient, air, soil or water pollution or when there is insufficient water supply for the development. All developments should demonstrate how they contribute to a reduction in nutrient pollution and greenhouse gas emissions.
- Agricultural livestock developments must submit a comprehensive greenhouse gas assessment that includes direct and indirect (upstream and downstream) emissions, i.e. Scope 1, 2 and 3 emissions through a recognised whole life-cycle methodology, and demonstrate alignment with local and national climate policies, including the UK's statutory carbon budgets.

- Agricultural livestock development must submit a waste strategy, demonstrating how waste will be managed both onsite and offsite. The strategy must include the destination for waste and any digestate, as well as demonstrating that there is a nutrient deficiency at the destination catchment in which waste will be spread.
- Agricultural livestock developments located within river catchments that are in unfavourable condition should be required to demonstrate at least nutrient neutrality.
- The cumulative impacts of **agricultural livestock** development and existing developments in the area must be taken into account when determining whether to grant planning permission. Applicants must demonstrate that pollutant thresholds are not exceeded.

## 2. Policy E2: This states that

***“significant weight should be given...to benefits relating to domestic food production, animal welfare and the environment”.***

**Analysis:** Focussing on increasing food production without clarifying the type of food production risks an increase in applications of intensive livestock units, which present a legal risk to local planning authorities due to their impacts on health and the environment. Simultaneously, we risk missing the opportunity to properly support sustainable local farming enterprises.

Intensive livestock production is a threat to food security in the medium to long term, and farming jobs in the short term, because:

- It diverts large quantities of arable crops and land away from direct human consumption, greatly reducing the efficiency of UK farming. High-protein pulses, nuts, grains and peas generates more than triple the calories per hectare than the most intensive animal systems.
- Farmers are at risk of feed price volatility, disease outbreaks, and supply chain disruptions, often linked to imported feed like soya.
- The environmental impacts of intensive systems, including soil degradation, water pollution, and greenhouse gas emissions undermine the productivity of UK agriculture.
- Diversity brings strength. Smaller, family run and more resilient mixed farming enterprises are undercut and outcompeted by intensive systems.
- Not all forms of food production are beneficial to food security. As a recent UK security report warned, current UK food production practices can't meet the needs of the UK population. Food production that is import-dependant, high-waste, and harmful to global ecosystems is risking the availability of food, UK economic prosperity and political stability. The UK does not have enough land to feed both people and livestock.

This policy requires detailed practice guidance and clear criteria to define what constitutes genuine animal welfare improvements, and how such improvements would be secured, enforced and monitored. Animal welfare is increasingly being cited as a justification for further intensive livestock development, including in areas already experiencing significant air, soil and water pollution arising from these operations. Welfare benefits should come in combination with overall reduction in climate impacts, and not override the need to protect the environment. Proposals must still demonstrate that they would not result in adverse environmental impacts, and contribute to climate targets.

**Recommendation:** Replacing “domestic food production” with “long-term food resilience” would better reflect the need for resilience, efficiency and sustainability in the food system and support councils in scrutinising whether agricultural developments are genuinely appropriate in the context of worsening climate change and global geopolitics.

The policy should explicitly define the types of agricultural developments that contribute to the aims of planning policy and food resilience, i.e. sustainable and agroecological farming systems, horticulture, infrastructure to support a localised food system (for example polytunnels, small-scale abattoirs, processing facilities, distribution hubs, farm shops, butchers, local producer markets, and community-supported agriculture facilities), and affordable rural worker housing as this is essential. Without this clarification, there is a significant risk that intensive livestock developments rely on “animal welfare” claims to obtain policy support, including in areas already experiencing high levels of air, soil and water pollution. Clear criteria to define what constitutes genuine animal welfare improvements, and how such improvements would be secured, enforced and monitored is also necessary.

### **3. Policy E4: This states:**

***1. In applying policy E2, the sustainable growth of businesses in rural areas should be supported, including through:***

***b. The development and diversification of agricultural and other land-based businesses;***

...

***d. Development to maintain and enhance farm viability and sustainability and support domestic food production, such as better accommodation for livestock.***

**Analysis:** As above. Agricultural development should be subject to full scrutiny and be required to comply with the wider policy framework. Development proposals for intensive livestock systems, or those that increase reliance on imported feed, high stocking densities, greenhouse-gas intensive production or indoor confinement, should not be supported.

**Recommendation:** Replace this with:

*In applying Policy E2, the growth of rural businesses should be supported where development operates within environmental limits and contributes to climate mitigation, nature recovery and pollution reduction, including through:*

- b. The development and diversification of agricultural and other land-based businesses toward low-input, agroecological, and sustainable farming systems that enhance soil health, biodiversity and water quality;*
- d. Development that improves farm resilience and long-term sustainability without increasing livestock numbers, pollution, or greenhouse gas emissions, and which supports long-term food security rather than short-term output.*

#### **4. Policy DM7: This states:**

***"1. Development proposals should be assessed on the basis of whether they would be an acceptable use of land. Matters which are controlled by separate regulatory regimes may, in the context of a particular development proposal, be a material consideration where they have land-use implications. Decision-makers should assume, unless there is clear evidence to the contrary, that those separate regimes will operate effectively."***

**Analysis:** The requirement for "clear evidence to the contrary" places a heavy evidential burden on planning authorities and the community to demonstrate the separate regimes are not operating effectively.

This policy also contradicts Policy P3.3 which says that "it should not be assumed that other regimes for the control of pollution will necessarily eliminate emissions completely." and two recent cases (The National Farmers' Union v Herefordshire Council 2025 and Caffyn v Shropshire Council 2025) which found that planning authorities could not rely on the Environment Agency to prevent pollution from livestock units

**Recommendation:** Policy DM7 should be consistent with Policy P3.3 and case law, ie Where there is evidence that other regulatory regimes are not operating effectively, for example in polluted river catchments, decisionmakers may require additional measures to prevent harm or refuse permission where they cannot be satisfied that adequate and effective measures are in place to prevent harm.

***"3. The parallel processing of planning and other regulatory consents is encouraged where this can help to align and expedite the consenting of development."***

**Analysis:** This encourages that planning and environmental permitting decisions are processed in parallel, but this is not obligatory. The lack of any duty to align planning and permitting decisions allows discrepancies between numbers and types of livestock housed and what was approved in planning.

**Recommendation:** Policy DM7 3 should be made mandatory, unless there are good reasons why the decisions cannot be made in parallel.

## 5. Policy PM6(1): This states

***"All plan-makers should, in preparing plans: ...c) Not duplicate, substantively restate or modify the content of national decision-making policies unless directed by other policies in this Framework;"***

**Analysis:** This could discourage plan-makers from including policies to address specific issues in their locality. Factory farms tend to be concentrated in certain areas, disproportionately affecting them, so a flexible approach is vital.

**Recommendation:** Plan-makers should have the flexibility to include policies to address specific issues in their locality.

## Lack of clarity in supported development

**Analysis:** One of the stated aims of the revisions to the NPPF is to improve clarity. Clarity is urgently needed on the kinds of farming and food production that should be supported.

**Recommendations:** The NPPF should set out clearly what kind of food production should be supported for a sustainable and food secure future, for example:

Agricultural developments should contribute positively to:

- Sustainable food production, including reductions in greenhouse gas emissions and land footprint, supporting nature recovery in a holistic way, and reducing air and water pollution.
- Producing healthy foods for which there is a demonstrable nutritional deficit in the UK and supporting healthy and sustainable diets, i.e. more vegetables, legumes, pulses and nuts.
- Resilient local and regional food economies (for example via direct sales, public procurement, farmers' markets, community-supported agriculture, community food growing or local processing and sales).
- Creating good quality employment in the food and farming sector, with fair working conditions.
- Crop or livestock diversity, and reducing vulnerability to pests, disease, pathogens and market shocks.
- Less resource-intensive production methods (including agroecological or regenerative practices not overly reliant on inputs of grain, feed, chemical inputs and fossil fuels).

# Key policies are missing to aid a transition to a sustainable, food secure, resilient UK food system

**Analysis:** Designating and protecting the most suitable land for sustainable farming and horticulture provides certainty for farmers and secures its use for food production, which prevents irreversible land degradation, and supports the local authority's wider climate, health, and economic objectives.

**Recommendation:** Include a policy for rural and peri-urban land most suitable for sustainable farming (including land in the green belt) to be designated for sustainable farming and land most suitable for sustainable horticulture to be designated for sustainable horticulture. Applications for the conversion of this land to intensive livestock units will not be considered for these areas.

**Analysis:** Local food system infrastructure, from production to retail, is vital for:

- Enabling farmers to process, distribute, and sell food locally, shortening supply chains and reducing transport emissions.
- Increasing access to fresh, affordable, and healthy food.
- Supporting rural employment, skills, and business diversity.
- Building resilience against supply chain shocks and market volatility.
- Building community engagement with farming.

Loss of such infrastructure can undermine local farming viability and public access to healthy and sustainable food. Safeguarding these assets through local planning policy ensures they remain available for future generations and supports local strategies on climate, health, and economic development.

**Recommendation:** Include a policy that says:

*Proposals involving the change of use or loss of premises that provide essential local and healthy food system infrastructure including bakers, butchers, greengrocers, grocers, and specialist ethnic food shops will be resisted unless it can be demonstrated that they are no longer viable and there is no reasonable prospect of continued food-related use.*

## Conclusion:

The UK's legally binding carbon budgets, environmental improvement commitments and nature recovery targets cannot be met without structural change in the food and farming system. Planning policy is one of the key mechanisms through which land use change is managed, and it must therefore reflect environmental limits rather than assume continued

expansion of polluting types of agriculture rather than a transition to more sustainable ones. Our concerns with the policies aforementioned are that they currently:

- Place an excessive burden on planning authorities and communities to demonstrate harm
- Allow “animal welfare” and “farm viability” to be used to justify environmentally damaging development that **fundamentally** risks undermining UK food security
- Fail to distinguish between farming systems that support planning objectives and those that undermine them
- Do not adequately require assessment of cumulative pollution impacts
- Contradict case law and another NPPF policy
- Prevent plan-makers from having the flexibility to include policies to address specific issues in their locality
- Do not include key policies vital for a transition to a sustainable, food secure, resilient UK food system
- Do not resolve the issue of discrepancies between planning applications and environmental permits

Without amendment, the Framework risks facilitating further concentration of intensive livestock development in already polluted areas, locking in emissions and environmental damage for decades, and exposing authorities to legal and financial risk where waste, cumulative and climate impacts are not properly addressed.

The NPPF should instead provide clear direction that agricultural development must operate within environmental limits.

We are therefore urging MPs to help ensure the revised NPPF works for rural communities and supports sustainable, agroecological farming. In particular, we ask you to support changes to:

1. Explicitly **support infrastructure like small-scale storage, retail and horticulture**, local processors, distribution hubs, farm shops, butchers and local producer markets. This would remove some of the barriers to growth for these enterprises, and protect the UK’s ability to feed itself over the long term while boosting economic growth;
2. **Prioritise long-term food security** (rather than simply production) to safeguard our food resilience in the context of growing geopolitical instability and climate collapse;
3. **Give local councils the powers and clarity they need to refuse harmful developments** and consider cumulative pollution, climate and nature impacts, ensuring planning decisions truly protect rural communities and the environment and;
4. **Ensure the revised NPPF aligns with the UK’s climate and environmental legislation and relevant case law**

Clarity on these points would not hinder rural economies; it would help direct investment toward farming systems that are resilient, sustainable and aligned with national policy objectives. Not all agriculture delivers the same outcomes, and planning policy must now reflect that reality. This shift is essential if the planning system is to remain coherent, lawful and fit for purpose in the context of the climate and nature crises.

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Sustain is a powerful alliance of organisations and communities working together for a better system of food, farming and fishing, and cultivating the movement for change.  
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