

Summary

The UK Government has released a [consultation](#) on a revised National Planning Policy Framework (NPPF) – deadline 10 March 2026.

Plantlife suggests key points for responding to specific consultation questions, in order to ensure that wild plants and fungi, particularly species-rich grasslands, are appropriately protected within England's planning system.

Suggested points for response

Question 42 Do you agree with the approach to planning for climate change in policy CC1?

Question 148 Do you agree policy DP3 clearly set out principles for development proposals to respond to their context and create well-designed places?

Recommendation: Explicitly include appropriately managed wildflower-rich grasslands and road verges as examples of Nature-based Solutions and Green Infrastructure

- Green Infrastructure (GI) and Nature-based Solutions (NbSs) provide vital multifunctional benefits to local communities, and should be embedded within the NPPF and guided by Local Nature Recovery Strategies (LNRs).
- For example, **wildflower-rich grasslands and meadows** - appropriately managed, restored, or created within an urban setting can provide shade for wildlife, as well as contributing to an '**urban cooling effect**'¹ for people. These areas can include public parks, gardens, road and rail verges, canal and riverbanks.
- Compared to tightly mown and monoculture urban grasslands, **the diverse plant communities found in wildflower-rich grasslands can slow down water flow, enhance water infiltration, help stabilise soil - reducing erosion and runoff**² - remove harmful air pollutants, sequester soil carbon, provide vital connectivity for wildlife, and provide accessible green spaces that promote active travel.
- **The adoption of a few basic management principles** could significantly boost the biodiversity of grassland green spaces, help reduce management costs and carbon emissions, and bring aesthetic and health benefits for local communities.³
- **There are opportunities for the government to support the scaling up of biotechnologies by transforming the existing grassland green space management system into a bio-based circular economy model. This will also boost biodiversity and cut management**

¹ Park, J., J. Kim, D.K. Lee, C.Y. Park, S.G. Jeong. 2017. The influence of small green space type and structure at the street level on urban heat island mitigation. *Urban Forestry & Urban Greening* (21): 203-212. <https://doi.org/10.1016/j.ufug.2016.12.005>

² Bengtsson, J., Bullock, J. M., Egoh, B., Everson, C., Everson, T., O'Connor, T., O'Farrell, P. J., Smith, H. G., and Lindborg, R.. 2019. Grasslands—more important for ecosystem services than you might think. *Ecosphere* 10(2):e02582. [10.1002/ecs2.2582](https://doi.org/10.1002/ecs2.2582)

³ Plantlife has produced award-winning road verge management guidance: https://www.plantlife.org.uk/wpcontent/uploads/2023/03/Managing-grassland-road-verges_2020.pdf

costs. Affordable and scalable biotechnologies could transform grass cuttings from a waste product into a valuable, sustainable resource capable of generating heat, power, biofuels, fertiliser, peat replacement and bio-based construction materials⁴.

- **Local Authorities (LA) must be provided with sufficient resource to deliver and manage green spaces for these benefits;** a 2025 report found 80% of LA respondents said that funding squeezes to public sector resources disproportionately impacted green spaces and parks compared to other areas⁵. This is despite growing recognition of their potential to provide climate, biodiversity and health benefits; for example, 67% of respondents were **planting wildflower meadows, in recognition of their multifunctional benefits.**

Question 43 Do you agree with the approach to mitigating climate change through planning decisions in policy CC2?

Recommendation: Alongside trees and peatland, the NPPF should explicitly recognise wildflower meadows and species-rich grasslands as important carbon stores for creating or restoring habitats, and for the avoidance of harm.

- Woodland planting must follow ‘**right tree, right place, right management**’ principles, to provide the most effective climate mitigation that avoids the destruction of existing high nature value habitats from inappropriate tree planting
- Other habitats, such as **species-rich grasslands (e.g. upland hay meadows, floodplain meadows, or waxcap grasslands) can be important carbon stores;** studies have found that species-rich grasslands can store more soil carbon per hectare than intensively managed (“improved”) grassland and crops⁶. Over a third of this carbon can be re-emitted into the atmosphere if the soil is disturbed⁷.
- Approximately 35% of England’s land cover is currently intensively managed grassland⁷. If **areas of intensively managed grasslands are restored towards grasslands rich in wild plants and fungi,** then there is a huge potential for management changes (such as introducing wildflower seeds, stopping fertilising and ploughing) to **benefit biodiversity, sequester more soil carbon, produce nutritious food, and provide other ecosystem services**⁸.
- As recognised by the Minister for Water and Flooding, **grasslands absorb carbon and enhance climate resilience**⁹. The revised Environmental Improvement Plan also contains a commitment to assess the carbon sequestration and biodiversity of grasslands.

⁴ <https://www.westsussex.gov.uk/roads-and-travel/maintaining-roads-verges-and-pavements/verge-maintenance/greenprint/>

⁵ <https://www.apse.org.uk/index.cfm/apse/members-area/briefings/2025/25-04-state-of-the-market-on-parks-and-greenspaces/>

⁶ Emmett, B. A., Reynolds, B., Rowe, E., Spurgeon, D., Brittain, S. A., Frogbrook, Z., ... Woods, C. (n.d.). Countryside Survey: Soils Report from 2007.

⁷ Guo, L. B., & Gifford, R. M. (2002). Soil carbon stocks and land use change: A meta analysis. *Global Change Biology*, 8(4), 345–360. <https://doi.org/10.1046/j.1354-1013.2002.00486.x>

⁸ <https://www.plantlife.org.uk/wp-content/uploads/2023/08/Grasslands-as-a-Carbon-Store.pdf>

⁹ <https://questions-statements.parliament.uk/written-questions/detail/2025-12-08/97863>

Question 98 Do you agree with the proposed approach to supporting development for renewable and low carbon development and electricity network infrastructure in policy W3?

Recommendation: Wording should be inserted to ensure that genuine co-benefits for climate and biodiversity are considered in decision making around renewable energy infrastructure.

- **A strategic approach to planning solar energy infrastructure should prioritise rooftops and other hard infrastructure** (e.g. car parks)¹⁰ and steer away from sensitive areas of high nature value, such as species-rich grasslands or heathlands.
- **If solar arrays are established on existing species-rich grasslands, or on grassland with the potential to be restored to more diverse grassland, there the ecosystem is likely to be destroyed or degraded.** For example, the churning of soil from the installation machinery, the shading and micro-climate of the solar panels¹¹ and inappropriate grazing regimes reduce plant biodiversity, and in turn, reduce pollinators biodiversity.
- **Solar arrays may bring biodiversity benefits when converting arable land or temporary grass-leys to permanent grassland, but only if managed appropriately over the long term.** If a site is to be established on permanent grassland with low biodiversity baseline or monoculture grass, then low-density grazing livestock and/or reseedling with local provenance wildflower seed mixes can increase the floral and fungal diversity, structural diversity, as well as providing flowering plant diversity for pollinators.
- **Long-term Biodiversity Management Plans are essential to ensure solar arrays are consistently managed to increase biodiversity over a meaningful timescale,** following advice from established guidance¹².

Question 83 Do you agree policy N6 provides clarity on the treatment of internationally, nationally and locally recognised site within the planning system?

Recommendations: Make it clear that the examples of habitats provided within the Irreplaceable Habitat definition are examples in a non-exhaustive list. Include additional habitats ‘upland hay meadows’ and ‘floodplain meadows’ as examples of Irreplaceable Habitats.

- **We welcome the expanded definition of Irreplaceable Habitats (IHs),** which recognises their uniqueness, rarity, environmental context, and species-richness; they cannot be easily re-created within a meaningful timeframe once destroyed.
- The UK’s most threatened habitats, in need of conservation action, were listed in the UK’s Biodiversity Action Plan (UK BAP), as a response to obligations under the UN Convention on Biological Diversity (CBD). All UK BAP habitats are considered of principal importance for the conservation of biodiversity under section 41 of The Natural Environment and Rural Communities (NERC) Act. These are known as ‘priority habitat’ types. **Types of rare grassland, such as upland hay meadows and lowland calcareous grasslands, are priority habitats.**

¹⁰ <https://www.cpre.org.uk/resources/shout-from-the-rooftops-delivering-a-common-sense-solar-revolution/>

¹¹ Armstrong, A., Ostle, N.J. and Whitaker, J. (2016). Solar park microclimate and vegetation management effects on grassland carbon cycling. *Environmental Research Letters*, 11(7), p.074016.
doi:<https://doi.org/10.1088/1748-9326/11/7/074016>.

¹² <https://cdn.buglife.org.uk/downloads/realising-the-biodiversity-potential-of-solar-farms.pdf>

- **We recommend including examples of priority habitat grasslands on the IH list** (see Plantlife's [briefing](#) for more information). Priority habitat grasslands are among the most threatened and unique habitats in England. They are intrinsic to our traditional farming heritage and represent some of our most iconic and loved landscapes, such as the hay meadows of the Yorkshire Dales or Oxfordshire's floodplain meadows.
- The estimated extent of these priority habitat grasslands is around 0.8% of England's land cover¹³. For example, upland hay meadows cover an estimated tiny 870 hectares.

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¹³ Calculation based on England's land use statistics (2022) and total of priority habitat grassland types in Plantlife's SLR report. <https://www.gov.uk/government/statistics/land-use-in-england-2022/land-use-statistics-england-2022#fn:1>; <https://www.plantlife.org.uk/wp-content/uploads/2023/07/Plantlife-report-1-Status-Trends-and-Definitions-of-UK-Grasslands.pdf>