

Ministry of Housing, Communities and Local Government

National Planning Policy Framework: proposed reforms and other changes to the planning system

(England) Response from Propertymark

March 2026

Background

1. Propertymark is the UK's leading professional body of property agents, with over 19,000 members representing over 12,500 branches. We are member-led with a Board which is made up of practicing agents, and we work closely with our members to set professional standards through regulation, accredited and recognised qualifications, an industry-leading training programme and mandatory Continuing Professional Development¹.

Consultation Overview

2. The National Planning Policy Framework was first published in March 2012 under Prime Minister David Cameron's coalition government. The aim of the Framework is to help set rules for local planning authorities so that approved developments can better meet national objectives. The current UK Government via the Ministry of Housing, Communities and Local Government is looking to update the National Planning Policy Framework in order to ensure that planning decisions best reflect Local Plans in England.

Propertymark response – summary

3. In recent research, Propertymark has stressed that the UK has failed to meet housing need for at least over the past 20 years, where only 0.44 homes were built for every new person living in the UK compared with the peak of 2.74 between 1964 and 1983². Given the acute need for homes across the UK, it is vitally important that every new house built is the type and tenure that local communities need. The National Planning Policy Framework has the potential to achieve this if designed correctly. Our response can be broadly summarised by the following four points that will ensure that the National Planning Policy Framework facilitates the delivery of more homes that people need:

¹ <https://www.propertymark.co.uk/>

² [Meeting UK house demand, moving beyond the planning system | Propertymark](#)

- **Housing delivery must always respond to housing need** – above all considerations, local authorities must prioritise developments that can evidence how their plans would directly meet housing need.
- **Developments must take an infrastructure-first approach** – this will involve giving greater weight to proposals that have plans in place to deliver sufficient infrastructure, even if the size of development does not require consideration to infrastructure to be made. Through taking an infrastructure-first approach, developments are also more likely to get the support of existing residents who often feel that local services, roads, schools, health care provision and infrastructure is overran so more homes mean more people to compound the problem.
- **Reduce ways for planning applications to avoid meeting housing need** – some proposals within the Draft National Planning Policy Framework allow for developments to avoid meeting targets in some circumstances. These policies should be reviewed and dropped to avoid developers overpromising housing targets, only to reduce them once planning applications have been approved.
- **Seek to issue more prescriptive guidance where possible** – within the Draft National Planning Policy Framework, there are a number of areas that are open to interpretation from local authorities. To ensure greater consistency of interpretation of the Framework from more local authorities, the Framework needs to consider including more examples in its guidance to avoid misunderstanding in key areas.

Consultation Questions – Propertymark response

4. Propertymark omitted the majority of the questions of the consultation questions from our response to enable us to focus on the questions related to housing delivery.

Question 48: Do you agree the requirements for spatial development strategies and local plans in policy HO1 and policy HO2 are appropriate?

5. We strongly agree that the requirements for spatial development strategies and local plans in policy HO1 and policy HO2 are appropriate. It is essential that plans include a strategy for the delivery of homes based on local housing need for the size, tenure and type of housing that is needed. A failure to do so will result in developments that are left empty or that force existing residents to leave the area due to a lack of supply in the specific homes they need.

Question 49: Is further guidance required on assessing the needs of different groups, including older people, disabled people, and those who require social and affordable housing?

6. We strongly agree that there should be additional guidance for assessing the different needs of different groups so that local authorities can more effectively establish the projected need for different homes in their area. The guidance should link specific types, tenures and sizes of homes with the different groups who need these homes as well as how to make an informed assessment of the population of each group and estimated population increase. In addition to providing guidance, local authorities must be able to demonstrate that they have conducted this assessment and how approved plans meet demand for specific demographics as well as types and tenures of homes. If some plans meet demand for particular types over others, local authorities must then ensure that future plans meet demand for demographics and types of homes that have not so far been approved for development.

Question 50: Do you agree with the approach to incorporating relevant policies of Planning Policy for Traveller Sites within this chapter?

7. We agree that spatial development strategies and Local Plans should consider the need for Traveller Sites. This would help to avoid disruption to land that has been allocated for development and other use, preventing delays to the delivery of new homes.

Question 51: Is further guidance needed on how authorities should assess the need for traveller sites and set requirement figures?

8. We agree that further guidance is needed on how authorities should assess the need for traveller sites. We would recommend engaging directly with representatives of traveller communities to understand their needs to establish sites that would be more likely to be used. This would lead to less disruption for land not designated as traveller sites.

Question 52: Do you agree the new Annex D to the draft Framework is sufficiently clear on how local planning authorities should set the appropriate buffer for their local plan 5-year housing land supply?

9. We agree that the new Annex D to the draft Framework is sufficiently clear to demonstrate that local authorities need to include a 5% buffer on housing land supply, unless there has been a recent under delivery of homes which raises the buffer to 20%.

Question 53: Do you agree the new Annex D to the draft Framework is sufficiently clear on the wider procedural elements of 5-year housing land supply, the Housing Delivery Test and how they relate to decision-making?

10. We agree that Annex D to the draft Framework is sufficiently clear on the wider procedural elements of 5-year housing land supply, the Housing Delivery Test and how they relate to decision-making.

Question 54: Do you agree the requirements to establish a 5-year supply of deliverable traveller sites and monitor delivery are sufficiently clear?

11. We agree that the requirements to establish a 5-year supply of deliverable traveller sites and monitor delivery are sufficiently clear.

Question 55: Do you agree the plan-making requirements, for both local plans and spatial development strategies, in relation to large scale residential and mixed-use development are sufficiently clear?

12. We disagree that the plan-making requirements for local plans and spatial development strategies are sufficiently clear. Given the importance of large-scale and mixed-use development, as well as their potential impact on existing infrastructure, we would recommend more prescriptive requirements for what needs to be achieved in order for developments to be approved. For example, where the current draft Planning Framework states “be capable of being supported by the necessary infrastructure and facilities” the Framework needs to set clear guidance on what “supported” entails. By setting clearer guidance and targets for what additional infrastructure and

wider community amenities are required, large developments need, local authorities can minimise the impact new developments have on existing communities.

13. Additionally, PropertyMark is aware that some larger sites can be purchased by multiple developers, splitting the land between them so they do not technically meet the threshold for large scale development. We would recommend introducing new requirements to ensure that developers need to collaborate on delivering all large-scale development requirements if the combination of land or units delivered by multiple developers in an area would meet the large-scale threshold.

Question 56: Do you agree our proposed changes to the definition of designated rural areas will better support rural social and affordable housing?

14. We agree with proposed changes to the definition of designated rural areas to allow for affordable housing contributions to be sought on minor development in parishes with a population of 3,000 or less and a population density of two persons or less per hectare. The delivery of homes needs to respond to the demand for all types and tenures in all areas. Where demand for social homes in rural areas is identified, affordable housing contributions will help to ensure that more affordable homes can be built in rural areas.

Question 57: Do you agree with our proposals to ask authorities to set out the proportion of new housing that should be delivered to M4(2) and M4(3) standards?

15. Yes, we agree with proposals to set out the proportion of new housing that should be delivered to M4(2) and M4(3) standards. This will ensure that the UK's growing aging population and disabled residents have access to homes that are or that can be made accessible.

Question 58: Do you agree 40% of new housing delivered to M4(2) standards over the plan period is the right minimum proportion? Please provide your reasons, and would you support an alternative minimum percentage requirement?

16. We agree that a minimum baseline of housing that is able to be made accessible should be set to ensure that local authorities can ensure homes are available for new residents moving into the area, even if accessible housing is not currently needed at these levels. 40% should provide a good

level to minimise the number of people who cannot move to certain areas due to a lack of available suitable housing.

Question 59: Do you agree the proposals to support the needs of different groups, through requiring authorities to identify sites or set requirements for parts of allocated sites are proportionate?

17. We agree with proposals to support the needs of different groups. However, in its current form the National Planning Policy Framework only focuses on the type and mix of affordable housing. We would recommend that this need goes further as there are different groups that may need different tenures, for example, younger people more often need rented housing (both private and social). Local authorities must as far as possible ensure that requirements for sites reflect assessed need of all types, sizes, costs and tenures of homes.

Question 60: Do you agree with our proposals to ask authorities to set out requirements for a broader mix of tenures to be provided on sites of 150 homes or more? Please provide your reasons and indicate if an alternative site size threshold would be preferable?

18. We agree with proposals to set out requirements for a broader mix of tenures to be provided on sites of 150 homes or more. This will ensure that new homes better reflect demand for a range of housing tenures. This will ensure that the homes that are built more effectively reflect housing need.

Question 61: Do you agree with proposals for authorities to allocate land to accommodate 10% of the housing requirement on sites of between 1 and 2.5 hectares?

19. We disagree with proposals for local authorities to allocate land to accommodate 10% of the housing sites of between 1 and 2.5 hectares. This sets restrictions on the sites that can be allocated, which may reduce the effectiveness of local authorities to meet housing targets as smaller sites may not allow for the development of housing that directly meets housing need. As an alternative method to ensure SMEs are supported by the National Planning Policy Framework, local authorities should be required to allocate 10% of housing developments to SMEs. This has two benefits over the proposed requirements to set targets specifically for smaller sites. Firstly, this guarantees that SMEs benefit from the National Planning Policy Framework, as there is no guarantee or requirement in the proposed Framework that larger firms would not develop on

these sites. Secondly, while smaller sites may restrict what can be developed on them, therefore potentially reducing the ability for local authorities to meet specific housing needs, SMEs would not be restricted in the same way.

Question 62: Are any changes to policy HO7 needed in order to ensure that substantial weight is given to meeting relevant needs?

20. We would recommend explicitly stating how much weight should be given where applications demonstrate how they meet the needs of the local community and local housing need assessments (which should be publicly available to applicants). To further ensure that this policy leads to an improvement in how applications meet housing needs, there should be an explicit requirement for local authorities not to accept applications that score poorly on meeting housing need, with some exceptions.

Question 64: Do you agree flexibility relating to the size of market homes provided will better enable developments providing affordable housing?

21. We agree that flexibility relating to the size of market homes should be adopted when developing affordable homes in cases where existing size requirements would jeopardise affordability requirements. However, we would recommend that this shouldn't be considered the default, as this could lead to a larger number of smaller social homes being built to meet requirements for the total number of affordable homes built. Measures should still be implemented to ensure that a range of sizes of social homes be built so that single residents, couples and families of different sizes can be accommodated.

Question 65: Would requiring a minimum proportion of social rent, unless otherwise specified in development plans, support the delivery of greater number of social rent homes? If so, what would be an appropriate minimum proportion and development size threshold taking into account development viability?

22. We would recommend against issuing a minimum proportion of social rent for each development for all local authorities. As an alternative, we would recommend that local authorities need to achieve a total number of social homes depending on their assessment for housing need. This would be spread across multiple sites, allowing for local authorities to ensure that social homes

can be built on sites that are most suitable for them. For example, sites that are closer to public infrastructure to avoid a reliance on cars which social renters may be less likely to afford due to financial reasons, age or disability. This would also give local authorities the ability to set minimum targets for each development if there aren't any development sites that would be especially suitable for social housing.

Question 66: Are changes to planning policy needed to ensure that affordable temporary accommodation, such as stepping stone housing, is appropriately supported, including flexibilities around space standards?

23. We would recommend including the need to assess temporary housing as part of the need for local authorities to establish housing need. Alternatively, local authorities may wish to consider an additional percentage of all new homes built to be allocated as temporary housing to account for potential cases where demand for temporary housing increases.

Question 67: Do you agree that applicants should have discretion to deliver social and affordable housing requirements via cash payments in lieu of on-site delivery on medium sites? If so, would it be desirable to limit the circumstances in which cash contributions in lieu of on-site delivery can be provided – for example, should it not be permitted on land released from the Green Belt where the Golden Rules apply?

24. We disagree that applicants should have discretion to deliver social and affordable housing requirements via cash payments in lieu of on-site delivery on medium sites. This provides a financial incentive for local authorities to accept applications that do not meet social housing requirements. While this can be offset by requiring local authorities to give greater weighting to applications that meet social and affordable housing requirements, this could be abused by developers who overestimate their ability to meet these targets in applications and pay local authorities for each affordable property they can no longer build. This ultimately makes it harder for SMEs to be approved for developments as larger firms who can afford to make payments to local authorities out bid them.

Question 67a: If you do not believe applicants should have blanket discretion to discharge social and affordable housing requirements through commuted sums, do you think cash contributions in lieu of on-site delivery should be permitted in certain circumstances – for example where it could be

evidenced that onsite delivery would prevent a scheme from being delivered? Please explain your answer.

25. We would recommend avoiding cash contributions in all circumstances. This avoids potential misuse while ensuring that social housing targets can be met. The ability for developers to not meet social housing targets would severely impact local authority's ability to meet housing need, especially if particular sites are designated for social and affordable housing.

Question 68: What risks and benefits would you expect this policy to have? Please explain your answer. The government is particularly interested in views on the potential impact on SME housing delivery, overall housing delivery, land values, build out rates, overall social and affordable housing delivery, and Registered Providers (including SME providers).

26. There are three risks that we expect this policy to have, with one benefit that the policy can reduce disruption in developments while providing local authorities with additional resources. Firstly, there are risks that the policy can enable larger developers to over-promise the delivery of social and affordable homes in applications, effectively outbidding all other applicants, while having the ability to pay local authorities if they cannot meet these targets. This would further limit the number of sites available to SMEs. Secondly, the ability to pay for failing to meet social and affordable housing requirements risks local authorities failing meeting housing need. Where resources are tight for local authorities, having developers pay for missed social and affordable homes on sites could prove to be too high of an incentive, leading to local authorities failing to meet social and affordable housing targets. Thirdly, if a local authority is relying on a few specific sites to meet housing need for social and affordable housing, and developers have a mechanism to reduce the number of social housing built on the site, these local authorities risk failing to meet their targets. This would be especially risky if other sites that didn't include a large number of affordable and social homes had already received planning permission.

Question 69: What guidance or wider changes would be needed to enable Local Planning Authorities to spend commuted sums more effectively and more quickly?

27. We disagree that Local Planning Authorities should receive any commuted sums in this way. Should they receive any commuted sums, it should be to support the delivery of social and affordable housing to make up for the number of lost units.

Question 70: Would further guidance be helpful in supporting authorities to calculate the appropriate value of cash contributions in lieu? If so, what elements and principles should this guidance set out? Please explain your answer. For example, guidance could make clear that contributions in lieu should be an amount which is the equivalent value of providing affordable housing on site, based on a comparison of the Gross Development Value of the proposed scheme with the Gross Development Value of the scheme assuming affordable housing was provided onsite.

28. Should the policy go forward, we agree that the guidance should make it clear that contributions should be the amount which is the equivalent value of providing affordable housing on site as well as any costs to the local authority for needing to reassess how new affordable housing will need to be developed to ensure they still meet affordable housing targets.

Question 71: Do you support proposals to enable off site delivery where affordable housing delivery can be optimised to produce better outcomes in terms of quality or quantity?

29. We agree that offsite delivery should be enabled where it can be used to deliver more homes or the same number of homes at a higher quality.

Question 72: Do you agree with the criteria set out regarding the locations of specialist housing for older people?

30. We strongly agree with the criteria set out regarding the location of specialist housing for older people, that it should be “located where residents will be able to access frequently-used services easily and safely by walking, wheeling (including mobility scooters) and public transport; including through on-site provision where applicable” and meet M4(2) and M4(3) accessibility standards. As the UK’s population ages, building new specialist housing for older people to downsize has two clear benefits. Firstly, it frees up existing housing stock that is not suitable for older people and secondly, it ensures that older people have more suitable property to move into.

Question 73: Do you agree with the criteria set out regarding the locations of community-based specialist accommodation, including changes to the glossary?

31. We agree with the criteria set out regarding community-based specialist accommodation, that it should provide a safe and secure environment for residents and located where residents will be able to access frequently-used services. However, we would recommend providing additional details as to what local authorities should consider a “safe and secure environment” and how they would class being able to access services easily. This would also apply to all questions 72 and 74.

Question 74: Do you agree with the criteria set out regarding the locations of purpose-built student accommodation and large-scale shared living accommodation, including changes to the glossary?

32. We agree with the criteria set out regarding locations of purpose-built student accommodation but would also recommend that additional clarity be provided for local authorities as written in our answer to question 73.

Question 75: Do you agree the proposals provide adequate additional support for rural exception sites? Please provide your reasons, including what other changes may be needed to increase their uptake?

33. We agree with proposals to provide adequate additional support for rural exception sites. We would also recommend that there should be additional thresholds to require or recommend the use of exception sites if two of the following criteria are met: 1. The local authority has evidence that they would not be able to use the remaining land available for development to build the number of affordable housing units they need. 2. The negative impact through the use of rural exception sites would be smaller than the positives of meeting demand for affordable housing. By setting this requirement, local authorities would be put under more pressure to utilise these sites, increasing their uptake, without overly using exception sites where their use would negatively impact the local community.

Question 76: Do you agree with proposals to remove First Homes exception sites as a discrete form of exception site?

34. We do not agree with proposals to remove First Homes exception sites as a discrete form of exception site. Should there be evidence that the delivery of First Homes exception sites be in the best interests of a local community and allow a local authority to better meet their affordable housing targets, it should still be an option. Removing the option, even if uptake is small, could

jeopardise the ability for some local authorities to meet their targets should First Homes exception sites be useful for them.

Question 77: Do you agree proposals for a benchmark land value for rural exception sites will help to bring forward more rural affordable homes?

35. We have no comments to make at this time on the benchmark land value for rural exception sites.

Question 78: Do you agree the proposals to set out requirements for traveller sites at policy HO12 adequately capture relevant aspects from Planning Policy for Traveller Sites, whilst ensuring fair treatment for traveller sites in the planning system?

36. Propertymark does not have sufficient expertise to respond to this question, especially regarding fair treatment for traveller sites in the planning system.

Question 79: Please provide your reasons, particularly if you disagree.

37. We have no further comments to make at this time.

Question 80: Do you agree the proposals in policy HO13 will help to ensure development proposals are built out in a reasonable period?

38. We agree that proposals to impose a planning condition requiring that development begins within a timescale shorter than the relevant statutory default period should help ensure developments are built out in a reasonable period. We would also recommend introducing requirements for local authorities to give additional weighting in planning decisions to developments that can demonstrate that they can begin works within shorter timescales. To further ensure development proposals are built out in a reasonable period, developments that cannot begin within a timescale, or who delay completion part-way through development should face financial penalties. This would deter developers from putting forward applications when they know they do not have the capacity to deliver on them.

Question 81: Do you agree the requirements to take a flexible approach to the consenting framework for large scale residential and mixed-use development is sufficient to ensure the opportunities of large-scale development are supported?

39. We agree that a flexible approach to the consenting framework for large scale residential and mixed-use develop would help to ensure that large-scale developments are supported. There is a risk however that flexibility can be used to reduce the delivery of certain requirements within the development such as affordable homes or specific tenures. To help avoid this, when changes are required to update proposals, they must be able to demonstrate how any changes in units still meets housing need or to demonstrate how any change in outcomes is worthwhile, such as avoiding a potential lengthy delay in delivery.

Question 82: Are any more specific approaches or definitions needed to support the delivery of very large (super strategic) sites, including new towns?

40. Yes, we would recommend where multiple developers would be working on separate sites, e.g. for the delivery of new towns, proposals must explicitly include how developers will collaborate to produce the infrastructure needed for such a project. Additional weighting should be given to proposals where mutliple developers have committed to wide-scale collaboration to ensure sufficient transport access, necessary infrastructure, energy sources and other requirements for towns are met alongside residential and commercial property delivery. Developments with detailed plans that take into account infrastructure before homes are built should be prioritised as they would benefit from the flexibility needed to ensure that sufficient infrastructure is in place. For example, if later in the project it is projected that the new town would require additional roads or sewage access, adaptations in the designation of residential areas or location of specific housing units can be amended.

Question 83: Do you agree with the proposed changes to the Housing Delivery Test rule book?

41. We agree with the proposed changes to the Housing Delivery Test rule book, that authorities should be assessed against their adopted housing requirement where an up-to-date plan is in place or against local housing need where an up-to-date plan is not currently in place. This will ensure delivery is set against the most up-to-date assessment.

Question 114: Do you agree policy L1 provides clear guidance on how Local Plans should be prepared to promote the efficient use of land?

42. We agree that policy L1 provides clear guidance on how Local Plans should be prepared to promote the efficient use of land. However, there are some elements that can be strengthened to better improve clarity. While the existing guidance recommends local authorities to identify potential ways of making more effective use of land and setting minimum residential density standards, it does not clearly demonstrate when more effective use of land should be considered, especially if there are other options available such as building on brownfield sites or sites that have not been developed on.

Question 115: If not, what further guidance is needed?

43. The guidance would benefit from setting what the UK Government believes to be appropriate minimum density standards and why they may be needed. For example, minimum density standards would be beneficial for situations where local authorities have identified that prioritising housing delivery in town centres would best enable them to meet their housing targets. Additionally, the guidance should clarify when densification should be considered over building on land that currently hasn't been developed on.

Question 116: Do you agree policy L2 provides clear guidance on how development proposals should be assessed to ensure efficient use of land?

44. We disagree that L2 provides clear guidance on how development proposals should be assessed to ensure efficient use of land. While the guidance states that "substantial weight" should be given to the benefits where a development proposal would make better use of existing land, it does not clearly demonstrate what "substantial weight" entails. To improve guidance on this, the National Planning Policy Framework should include situations where building on new sites should be considered instead of making more effective use of existing land. For example, there may be examples where a local authority has to decide between two proposals, one where development on undeveloped land that would produce more units, but another produces fewer units but remediates derelict land or brings empty units back into use. Guidance should clearly show the degree in which secondary benefits and greater use of space should be considered over developments that produce a greater number of units. Furthermore, there will be other weightings to consider alongside this, such as how each development would help the local authority meet its housing needs. Propertymark recommends that meeting housing need should be weighted higher than making more effective use of existing land but if the UK Government

disagrees, its prioritisation of weighting needs to be made clear. Additionally, the UK Government should consider potential exemptions such as the availability of land that has not been built on or risks that the local authority will not be able to meet its housing targets.

Question 117: Do you agree policy L2 identifies appropriate typologies of development to support intensification?

45. We agree that L2 identifies appropriate typologies for the kinds of developments that would support intensification.

Question 118: Do you agree the high-level design principles provided in policy L2(d) appropriate for national policy?

46. Given the historic under-delivery of homes, efforts should be made to maximise the number of homes that can be built. Should local authorities identify the potential to create additional homes by using the airspace above existing residential and commercial premises, this should be explored as this has the potential to create additional dwellings. In addition to existing restrictions on these kinds of developments, already written in the draft National Planning Policy Framework, consideration must be made to the impact on local infrastructure. Any increase in demand for community services including transport, energy and waste management, will need to be taken into account and the supply of impacted services increased to respond to the demand.

Question 119: Do you agree policy L2 (d)(i) achieves its intent to enable appropriate development that may differ from the existing street scene, particularly in cases such as corner plot redevelopment and upwards extensions.

47. We disagree that policy L2(d)(i) achieves its intent to enable appropriate developments that may differ from the existing street scene. The existing text within the Framework implies that all proposals need to be consistent with the overall street scene, with some exceptions. Given the need for new homes, we do not recommend that considerable weighting be given to the consistency of design of the street. While development that are consistent with the overall street scene should be considered, priority must always be given to proposals that build more homes that respond directly to housing need.

Question 120: Do you agree with the proposed safeguards in policy L2 that allow development in residential curtilages?

48. We agree with the proposed safeguards in policy L2 that allow development in residential curtilages. Some safeguards are necessary to protect existing property values and minimise disruption to existing residents. However, some greater flexibility should be given in situations where local authorities face particularly acute housing shortages and other development areas would not be suitable. Where development takes place within residential curtilages, residents will need to be compensated.

Question 121: Do you agree policy L3 provides clear guidance on achieving appropriate densities for residential and mixed-use schemes?

49. We agree that some areas of policy L3 provides clear guidance on achieving appropriate densities for residential and mixed-use schemes. Where the Framework includes specific numerical values for densities, such as “density of at least 40 dwellings”, this is sufficiently clear. However, the Framework will need to ensure that it clearly defines what is considered “reasonable walking distance of a railway station” for the policy to become sufficiently clear. Additional consideration should be made for the expected residents for the new homes being developed. For example, single adult-aged residents and residents in purpose student housing will likely be more physically capable to walk to railway stations but younger children, disable residents and older people will need to be located closer to railway stations, unless there are additional transport links (such as busses or trams) available.

Question 122: Do you agree with the minimum density requirements set out within policy L3? Could these minimum density requirements lead to adverse impacts on Gypsies and Travellers and other groups with protected characteristics? Please provide your reasons, including any evidence

50. We do not have accurate data to assess if a minimum density of 40 dwellings per hectare would be sufficient to meet housing need across all local authorities. However, we disagree that a minimum density requirement should be set in this way. Rather than setting a national level, minimum density should reflect a local authority’s housing assessment needs and be taken on a case-by-case basis. This greater level of flexibility will allow local authorities to make more effective use of the land available to them, as long as they can demonstrate they can still meet their housing

need. As there will be situations where 40 dwellings per hectare is not possible for some plots of land, setting this minimum level of flexibility could leave some areas underdeveloped. A more flexible approach enables local authorities to still meet housing targets by increasing density in some areas where appropriate to make up for lower density in others areas.

Question 123: Do you agree that using dwellings per hectare is an appropriate metric for setting minimum density requirements? Additionally, is our definition of ‘net developable area’ within the NPPF suitable for this policy?

51. We agree that using dwellings per hectare is an appropriate metric for setting minimum density requirements, however, we disagree that minimum density requirements should be set where a local authority can demonstrate that housing need can be met through different levels of density. As an alternative to “net developable area” of the site, the Framework should consider the net developable land that the local authority has access to. That way they can demonstrate that multiple sites can meet the density requirements, ensuring sites more suitable for denser development can make up for less dense developments in other areas. This can also help improve the variety of homes built, ensuring that all sizes, tenures and types of properties can be built to meet local needs.

Question 124: Do you agree with the proposed definition of a ‘well-connected’ station used to help set higher minimum density standards in targeted growth locations? In particular, are the parameters we’re using for the number of Travel to Work Areas and service frequency appropriate for defining a ‘well-connected’ station?

52. We agree with the definition of a “well-connected” station used to set higher minimum density standards in targeted growth locations. However, we would urge caution against setting minimum density standards as written in our response to question 123. That being said, the onus should be on local authorities to demonstrate why failing to meet density requirements is necessary and how they will still be meeting housing needs in other areas.

Question 125: Are there other types of location (such as urban core, or other types of public transport node) where minimum density standards should be set nationally? If so, how should these locations be defined in a clear and unambiguous way and what should these density standards be?

53. No, we don't recommend that minimum density standards should be set nationally. Instead, we would recommend issuing guidance for local authorities to consider where there are clear benefits of setting minimum density standards. However, these should be under the discretion of local authorities as minimum density standards may not be feasible due to availability of needed community infrastructure or where alternative land can be better utilised for dense development. Ultimately, local authorities need to have the flexibility to meet their housing demand and need in the way that would produce the best outcomes for their community. Setting minimum density standards may be required in the majority of situations, especially given the current need for new homes, however setting minimum requirements can make it difficult to build homes on land where the minimum standard of density is challenging or where specific housing demand is not for dense developments.

Question 126: Should we define a specific range of residential densities for land around stations classified as 'well-connected'?

54. We have no further comments to make on the minimum residential densities for development.

Question 127: If so, what should that range be, and which locations should it apply to?

55. We have no further comments to make on the minimum residential densities for development.

Question 128: Do you agree policy L4 provides clear high-level guidance on good design for residential extensions?

56. We disagree that policy L4 provides clear high-level guidance on good design for residential extensions.

Question 129: Please provide your reasons, particularly if you disagree.

57. The phrase "blend effectively with the existing building" lacks clear technical definitions and examples, making it at risk of misinterpretation. The definition would benefit from more prescriptive guidance that provides more detail on what shouldn't be accepted in order to ensure more consistent interpretations of the Framework across all local authorities.

Question 146: Do you agree that policy DP1 provides sufficient clarity on how development plans should deliver high quality design and placemaking outcomes?

58. We agree that DP1 provides sufficient clarity on how development plans should deliver high quality design and placemaking outcomes. To further improve the policy, given the extent of housing demand and undersupply, the policy should also set out how the design of developments should be weighed against other outcomes. For example, if the developments with a larger number of units or developments that provide more evidence of meeting local housing need should be weighted higher or lower than developments that better meet an area’s existing characteristics and potential. Until the undersupply of homes is addressed, we recommend that developments that produce more homes that can demonstrate meeting housing needs should be prioritised over more ascetically pleasing proposals.

Question 147: Do you agree with the approach to design tools set out in policy DP2?

59. We agree with the approach to design tools set out in policy DP2 in that they are suitable to demonstrate the design of new developments.

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

60. We agree with the key principles for well-designed places so far as they are reasonable principles to ensuring that the design of new developments does not contrast considerably with the local area and can create well-designed places.

Question 149: Do you agree with the proposed approach to using design review and other design processes in policy DP4?

61. We have no concerns with the proposed approach to the design process, including that it should be considered throughout the evolution, assessment and delivery of development proposals.

Question 160: Do you agree that the proposed policies at HC3 and HC4 will support the provision of community facilities and public service infrastructure serving new development?

62. We disagree that proposed policies at HC3 and HC4 will support the provision of community facilities and public service infrastructure serving new developments. We recommend that the language within these policy HC3 in particular needs to be stronger to emphasise the need for community infrastructure rather than to be “informed by an understanding”. We recommend using the following text or something that equally emphasises the need for developments to account for the impact on community facilities and infrastructure:

- *“All proposals for housing, employment or other development must: Include an assessment of the impact of community facilities and public infrastructure, with the intent to ensure that any impact must be provided for through additional improvements to community facilities and public service infrastructure which are necessary for the development to be acceptable in planning terms, whether by direct provision or a contribution to off-site improvements (which may be through Community Infrastructure Levy payments, where applicable). Additional consideration must be made where multiple developments are taking place on neighbouring sites to account for the total impact of development in a given area.”*

63. We have broadened the definition to include all proposals, so that smaller developments will still need to take their impact into account. This alongside including where multiple developers are working on neighbouring sites helps to prevent situations where multiple developers work on the same site to avoid their responsibilities to address their development’s impact on local services.

Question 162: Do you agree with the proposed approach to retaining key community facilities and public service infrastructure in policy HC6?

64. We agree with proposals to retain key community facilities while retaining flexibility not to retain key facilities if there is no reasonable prospect of the facility being retained. We would also recommend that the Framework includes a clearer definition of “key community facilities”, and that the loss of key community facilities should be acceptable if the benefit of producing additional homes can make up for the loss.

Question 163: Do you agree with the approach taken to recreational facilities in policy HC7, including the addition of ‘and/or’ with reference to quantity and quality of replacement provision?

65. We agree with the approach taken to recreational facilities in policy HC7.

