

Department for Communities
Consultation on Shaping Sustainable Places
Response from Propertymark
August 2025

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 Development.

Consultation – overview

2. The Department for Communities, in collaboration with the Department of Agriculture, Environment and Rural Affairs and the Department for Infrastructure, has launched the Shaping Sustainable Places programme that aims to stimulate growth and prevent a decline in communities in Northern Ireland, be they villages, towns or cities. The 10-year programme aims to spend a total of at least £150m in total from the three departments as well as an additional £15m from Local Councils to be utilised for the regeneration of communities to create long-term growth and prosperity.

Propertymark response – summary

3. Propertymark welcomes the opportunity to respond to the Shaping Sustainable Places consultation. As the UK's leading membership body for property agents, we understand the importance that housing plays in supporting economic growth and social mobility. However, new homes alone cannot support a growing economy, they need the wider infrastructure that homes need to be desirable to live in and that create thriving communities. Our response follows Propertymark's series of responses to planning and wider infrastructure consultations, largely taking place in England at time of writing but can be applied across the UK. Our response is based on three positions that Propertymark holds:

- **Take an infrastructure first approach** – new homes alone do not make sustainable liveable communities. Without building fundamental infrastructure that makes people want to live in existing and new communities, new homes risk being left empty.
- **Any plans must respond to the needs of their community** – when making decisions on housing developments or wider community assets, decision makers must be able to evidence the demand and or need from the local community. This helps prevent situations where local authorities are chasing targets, especially house building targets, with little or no evidence of what is needed in different locations for people and communities.
- **Housing developers will need additional incentives to meet wider community needs** – housing developers have faced rising costs and are often incentivised to build large projects with fewer affordable or rental homes built. When the Shaping Sustainable Places Programme identifies the need for a range of tenures and affordable homes, developers will need the right incentives to build these projects.

Consultation Questions

Question 1: Please tell us if you are responding as an individual or on behalf of an organisation. If you are responding on behalf of a business or organisation, please tell us the name of the organisation.

4. We are responding as an organisation.

Question 2: To what extent do you agree with the proposed vision for Shaping Sustainable Places?

5. We agree with the vision: *“To work with communities to address local challenges through funding interventions that deliver sustainable, people-centred places providing economic, social and environmental outcomes.”*
6. The decline of highstreets and communities is multifaceted and there is no single solution that is applicable to each community. We therefore welcome the understanding that local challenges require bespoke solutions, each attributed to individual communities. We approve of the long-

term approach to ensure communities are sustainable and provide economic, social and environmental benefits.

Question 3: If you answered 'disagree' or 'strongly disagree' at Q2 above, please tell us why and/ or what you would expect to see in the vision statement?

7. We agree with the vision statement, thus have no additional comments to make at this time.

Question 4: To what extent do you agree with the proposed principles for Shaping Sustainable Places?

8. We agree with the four proposed principles of:

- **Strategic:** Ensure interventions delivered through Shaping Sustainable Places focus on long-term impact rather than short-term fixes.
- **Sustainable:** Respond to the changing needs of places by delivering interventions that address the economic, social and environmental sustainability of a place.
- **Integrated:** Building partnerships, collaboration across and outside government to deliver the best possible interventions.
- **Participative:** Empowering people and communities to be part of the regeneration of their place.

Question 5: If you answered 'disagree' or 'strongly disagree' at Q4 above, please tell us why and/ or what principles you would expect to guide interventions to help transform places?

9. We agree with the principles and have no further comments to make regarding the broad vision and principles of the programme.

Question 6: Do you agree with the timeframe proposed for Shaping Sustainable Places?

10. We agree with the timeframe proposed for Shaping Sustainable Places, that being with an initial 10-year budget commitment with a midpoint review after five years.

Question 7: If you did not select 'yes' above, please tell us why you think the timeframe should be shorter or longer?

11. We would also recommend an endpoint review for additional long-term funding based on the impact of the previous 10 years. Should the impact be positive, then the programme should run for another 10 years, with the aim to review the impact of the most beneficial local projects which could be replicated in other communities.

Question 8: To what extent do you agree that Shaping Sustainable Places plans should be developed through a placemaking process?

12. We agree that Shaping Sustainable Places plans should be developed through a process that, as detailed in the consultation document, "capitalises on a local community's assets, inspiration, and potential, and should result in the creation of quality public spaces that contribute to people's health, happiness, and well-being."

Question 9: If you answered 'disagree' or 'strongly disagree' at Q8 above, please tell us why and/ or how do you think plans should be developed?

13. While we agree with the principle of aiming towards long-term benefits, local authorities must be given the opportunity to address emerging and immediate challenges to long-term sustainability. While aiming for long-term solutions can help avoid ineffective short-term measures, a degree of flexibility is required to ensure that new challenges can be addressed. For example, if the Northern Ireland Executive introduces national legislation designed to support more people into buying a property, but a local authority has need of more rental housing, then that local authority must have the ability to introduce measures to support the delivery of more rental accommodation.

Question 10: To what extent do you agree or disagree that the Living High Streets Craft Kit would be a good approach to use to plan sustainable places?

14. We neither agree nor disagree that the Living High Streets Craft Kit would be a good approach to use to plan sustainable places.

Question 11: If you answered 'disagree' or 'strongly disagree' at Q10 above, how do you think plans should be developed?

15. We are not opposed to community input in concept. However, the benefits of community input depend on how they are considered by the local authority. On one hand, community engagement can help identify issues that the local authority was not aware of or didn't understand the extent to which it was impacting local residents. On the other hand, not all residents will be aware of every potential issue impacting the community or have a good understanding of solutions to these problems. Furthermore, some may recommend solutions which have a negative impact, for example, that fewer homes should be built in the community even if there is considerable demand for new homes. When taking these proposals from residents, local authorities should consider concerns raised but continue towards addressing challenges based on a combination of factors that involve more quantitative and qualitative research. Looking at the example of building new homes, if research has uncovered that there has been a considerable rise in rent prices and consumer demand for new homes to buy or rent, then that would indicate considerable demand for new homes. If, however, a significant number of residents raise that they would not like new homes built, the local authority should consider how to meet the demand for housing in a way that is less obstructive and where wider infrastructure can support new homes rather than reducing housing targets. This could include bringing empty homes and previously commercial buildings back into use, building on brownfield sites or expanding existing infrastructure to accommodate for the new homes.

Question 12: If your Local Council or community has already developed a plan for your place, to what extent do you agree or disagree that this existing plan should be used instead of developing a new plan using a placemaking approach?

16. We are responding as an organisation, and thus this question does not apply to Propertymark.

Question 13: If your Local Council wanted to assess the level of community support for a plan or a project for your local place, how would you expect them to engage with you? Pick as many options as apply.

17. We are responding as an organisation, and thus this question does not apply to Propertymark.

Question 14: To what extent do you agree or disagree with “Investing in public realm in village, town and city centres” as an objective when focussing on Place?

18. We strongly agree with the Shaping Sustainable Places objectives to invest in public realm in village, town and city centres. When seeking to build new homes, ensuring they are places that people want to live, and work is fundamental to increase the likelihood that these new homes will be bought and long-term sustainable communities can be created.

Question 15: To what extent do you agree or disagree with “Increasing occupancy levels by vacant buildings or derelict sites coming back into use” as an objective when focussing on Place?

19. We strongly agree with proposals to increase occupancy levels by vacant buildings and to bring derelict sites back to use. Not only can this make greater use of existing space without the need to invest in greater infrastructure, increasing the availability of homes can help alleviate pressure on rent and house prices.

Question 16: To what extent do you agree or disagree with “Creating more productive local economies” as an objective when focussing on Place?

20. We agree with creating more productive local economies as a way to encourage previously abandoned or struggling communities to grow and attract more residents to them. This can encourage more investment to areas where there previously was very little, leading to more demand for homes and opportunities for development projects.

Question 17: If you answered ‘disagree’ or ‘strongly disagree’ to Questions 14-16 above, please tell us why and/ or what you would suggest as alternatives for objectives for Place?

21. We agree or strongly agree with questions 14-16.

Question 18: To what extent do you agree or disagree with “Improving safety in village, town and city centres” as an objective when focussing on People?

22. We don't have a strong position on questions 18-20.

Question 19: To what extent do you agree or disagree with “Creating more active and sustainable infrastructure and facilities” as an objective when focussing on People?

23. We don't have strong positions on questions 18-20

Question 20: To what extent do you agree or disagree with “Reducing car dominance” as an objective when focussing on People?

24. We don't have strong positions on questions 18-20

Question 21: If you answered ‘disagree’ or ‘strongly disagree’ to Questions 18-20 above, please tell us why and/ or what you would suggest as alternatives for objectives for People?

25. Propertymark agrees in principle with improving safety, creating more active infrastructure and reducing car dominance in so far as they make communities more attractive places to live. However, specific initiatives to achieve these aims and their specific impacts are beyond Propertymark's area of expertise.

Question 22: To what extent do you agree or disagree with “Creating or growing existing green spaces” as an objective when focussing on Planet?

26. Our response to questions 22-25 is the same as our response to questions 18-21. Propertymark agrees in principle with efforts to make communities more resilient to climate change, however we do not have the expertise to evaluate the impact that specific measures could have.

Question 23: To what extent do you agree or disagree with “Building infrastructure that is more resilient to the effects of climate change” as an objective when focussing on Planet?

27. Please refer to our response to question 22.

Question 24: To what extent do you agree or disagree with “Ensuring buildings brought back into use are more energy efficient” as an objective when focussing on Planet?

28. Please refer to our response to question 22. In addition to our response, the cost of retrofitting these properties for existing owners (if applicable) must be proportionate. If buyers are required to meet certain energy efficiency requirements before they bring the property back into use, and there are few grant programmes to support them, we could see many of the inefficient buildings remaining empty. This would be due to the owner being unable to afford energy efficiency measures. To prevent this, local authorities or the Northern Ireland Executive must be able to purchase these buildings or establish funding support for owners of inefficient buildings.

Question 25: If you answered ‘disagree’ or ‘strongly disagree’ to Questions 22-24 above, please tell us why and/ or what you would suggest as alternatives for objectives for Planet?

29. Please refer to our response to question 22.

Question 26: Do you feel the partnership working to deliver these previous regeneration schemes was successful?

30. Propertymark is not in a position to comment on the impact and outcomes of the Capital Covid-19 Recovery Revitalisation Scheme and Covid Recovery Small Settlements Regeneration Programme.

Question 27: What, if any, are your views on how these three departments worked collaboratively in partnership with Local Councils to deliver the previous regeneration schemes outlined above?

31. We have no comments on how the Department for Communities, the Department of Agriculture, Environment and Rural Affairs and the Department for Infrastructure have worked collaboratively to deliver previous regeneration schemes.

Question 28: Do you think other partners should be involved in delivering Shaping Sustainable Places?

32. The Department for Communities is aiming to work in partnership with Local Councils, other Departments, the voluntary and community sector, local communities and the private sector to deliver improved outcomes and share and benchmark best practices, funding, risks, responsibilities and opportunities. If looking at specific partners, Propertymark would recommend working with professional bodies within the housing sector.

Question 29: If you answered yes to Q28 above, please tell us which other partners do you think should be involved in delivering Shaping Sustainable Places?

33. There are two kinds of professional bodies within the housing sector can support the delivery of Sustainable Places in multiple ways. Firstly, professional bodies involved in the renting or selling of property such as property agents, conveyancers, mortgage providers and surveyors, as well as individual businesses, can help to identify demand within local communities. This would include the kinds of homes that receive more interest and the amount of existing housing stock against the number of applications to rent or buy. Secondly, developers and firms involved in the planning and delivery of homes can help share best practice for meeting the Programme's objectives around Place, People and Planet. This would include how to support SMEs to develop new communities, how to best create communities which reduce car dominance and share challenges in the planning process.

Question 30: To what extent do you agree that the regeneration of villages, towns and city centres should be a long-term strategic priority, with security of funding, for the Northern Ireland Executive and Local Councils?

34. We strongly agree that the regeneration of villages, towns and city centres should be a long-term strategic priority, with security of funding, for the Northern Ireland Executive and Local Councils. Building new homes that people want to live in can help increase economic growth, reduce the pressure on rental price increases and increase commercial investment in highstreets.

Question 31: If you answered 'disagree' or 'strongly disagree' at Q30 above, please tell us why and/or what you would suggest as an alternative proposal for investing the limited funds available for regeneration?

35. We strongly agree with question 30.

Question 32: To what extent would you support the establishment of competitive funding opportunities to tackle specific regeneration issues?

36. We agree with the establishment of competitive funding opportunities to tackle specific regeneration issues.

Question 33: If you answered 'disagree' or 'strongly disagree' at Q32 above, please tell us why and/or what you would suggest as an alternative proposal to drive innovation in regeneration?

37. We agree with the proposal set out in question 32.

Question 34: Are there any specific regeneration issues or themes in your local area you feel could be tackled most effectively by the establishment of a competitive funding opportunity?

38. We are responding as an organisation with members across Northern Ireland. We are therefore unable to respond to this question.

Question 35: Please select from the list below your top 5 preferences that you consider to be the most important criterion when prioritising places for intervention through Shaping Sustainable Places?

- Length of time since previous capital investment in public space
- Levels of vacancy
- Road safety
- Economic activity data
- Addressing economic market failure
- Access to services for residents of surrounding areas
- Potential to attract visitors and tourism
- Potential to leverage private sector investment

- **Potential for people to meet and spend time**
- **Potential for increasing pedestrian areas**
- **Population size**
- **Air quality**
- **Impacts of extreme weather (e.g. flooding)**
- **Other**

39. Propertymark would support the following criterion for intervention through Shaping Sustainable

Places in no particular order:

- Levels of vacancy
- Addressing economic market failure
- Potential to leverage private sector investment
- Economic Activity Data
- Other: Demand for new housing compared to existing supply

40. These factors would ensure that investment can help support communities experiencing an undersupply of housing while ensuring that investments can have the best economic impact, therefore addressing housing issues while retaining value for money for local authorities and the Northern Ireland Executive.

Question 36: To what extent would you support the adoption of a Centre First policy for the location of public sector jobs and services in Northern Ireland?

41. We would support a Centre First policy as long as it is able to create communities that people wish to live in which can then be used to attract investment in new homes within the community. As long as this can be evidenced, Propertymark would support a Centre First policy.

Question 37: If you answered 'disagree' or 'strongly disagree' at Q36 above, please tell us why

42. We agree with a Centre First Policy as long as it can be evidenced that a Centre First Policy is able to deliver communities which people want to live in.