BUILDING THE FUTURE:

The Role of Civic Societies in Housing and Community Planning



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EXECUTIVE SUMMARY

Exe.1 This document examines the role of civic societies in influencing the creation of well-designed, quality places through the planning system, with an emphasis on the housing aspects of planning. The underlying values are derived from the mission and value statement of Civic Voice and are about championing communities and the promotion of sustainable, socially inclusive and well-managed places. Examples are also given of:

a) good practice in collaborative working by civic societies:

b) housing schemes that have been welcomed by civic societies and communities and that, in doing so, provide lessons for elsewhere and are of benefit to the qualities of a place.

Exe.2 Civic societies, like other civil society organisations, enrich democratic decision-making and help increase the accountability of government. They should feel free to oppose specific schemes or policies where they can show clear planning reasons to do so, and they should expect their views to be properly considered by the decision makers. They cannot expect local authorities or planning inspectors to always agree with them, but the likelihood of them agreeing will be increased if concerns are backed up with evidence and references to national and local planning policy.

Exe.3 Societies should always communicate and publicise their activities in relation to planning. They should publish their letters commenting on, supporting or objecting to planning proposals. Publication of communications on the website of a local society has become increasingly important as some local authorities no longer publish all comments on the planning portal. If they can, local societies should also formulate general statements of what they like and dislike – and why.

Exe.4 Government has a policy to increase the annual rate of housebuilding. Civic Voice supports this. Increased housebuilding has many advantages- for creating employment, for encouraging economic activities, such as those connected to domestic furnishings and equipment, for modernising the housing stock and for coping with population change. However, increasing housing supply alone has limited impact on affordability: direct support for low-income housing is essential. The lesson for civic societies is to support local proposals for affordable and social rent housing.

Exe.5 Local societies are sometimes invited to endorse regeneration projects that affect social housing. They should enquire whether the existing residents will be offered, promptly, a home nearby. They should also ask whether the proposals will lead to a net increase in social rented accommodation (ignoring 'affordable' rented housing and shared ownership housing, both of which involve higher outgoings).

Exe.6 Volume housebuilders and larger social housing agencies are likely to remain the most important source of additional homes in quantitative terms. At the same time, local societies should press local authorities to allocate sites for smaller developers and self-build schemes that will provide a greater variety of output.

Exe.7 Local societies should also press for the provision of alternative forms of housing derived from the broader civil society sector. Alternative forms are varied and include the following, overlapping examples:

- cohousing schemes providing self-contained housing units or rooms with shared facilities;
- group self-build where residents get together often with the support of a social housing agency to build affordable rented or owner-occupied homes to their own designs;
- co-operative housing where tenants make the key decisions;
- small-scale rented or shared-ownership projects developed in conjunction with a Parish Council;
- Community Land Trusts that separate land from building ownership, retaining the land in the ownership of a charitable organisation; and finally
- sites and services projects where a charitable or public body provides clusters of serviced plots where households can control the design and construction of their own home.

Exe.8 The development plan is the first consideration in determining planning applications. Public involvement after plans and strategy statements are adopted is often too late: proactive participation in plan and strategy making is essential. The development plan comprises the Local Plan, the Minerals and Waste Plan, if separate from the Local Plan and the Spatial Development Strategy. Neighbourhood Development Plans are also part of the development plan if prepared on a statutory basis.

Exe.9 In the making of plans and strategies, local societies should:

a) engage early in the process and consider working with other groups where they have a shared interest;

b) encourage everyone to recognise the importance of the development plan, making all interested parties aware of the shift towards involvement and engagement in plans and spatial strategies;

c) press local authorities to make the implications of plan proposals clear to communities;

d) press local authorities to explain and clarify any statements that they do not understand and insist that authorities use non-technical language in their explanation.

Exe.10 In assessing a plan or strategy, societies should examine issues specific to different sites, community impacts, infrastructure needs, and environmental considerations. Key points include housing affordability, transport, green space, heritage, and local employment.

Exe.11 Local Plans may span the area of different local societies. Local societies might well find that co-operation makes their task easier and produces policy alternatives that are more coherent. Local government reorganisation into larger units makes co-operation between civic societies even more important, as does the emergence of strategic spatial plans outside London. Societies, especially those outside London, should consider whether they are organised to address the strategic policies pursued by Mayoral authorities. However, even if they don't feel able to work with other groups, they should still try to understand what is developing at a strategic level and contribute to this where they can.

Exe.12 Local societies should press all relevant authorities to keep development plans up-to-date. An out-of-date plan carries little weight and makes it difficult for a local authority to control the extent and location of development. Failure to update plans is a denial of the ability of civic societies and community groups to comment on the direction of development.

Exe.13 Local societies should work with planning staff to build trust, so that they see the Society as a positive if critical friend, helping them when it comes to making difficult, complex judgments and doing positive things to promote local pride in a way that a local authority on its own cannot easily do.

Exe.14 In the absence of national funding support for neighbourhood planning, local groups might persuade a Council to sponsor or prepare such a plan. An alternative is for a local society to undertake neighbourhood plan revision on an informal non-statutory basis in a way that uses local volunteers and can avoid the most onerous legal procedures. This would not have the legal significance of being part of the development plan but the local authority, and inspectors on appeal, should still be able to treat it as a material consideration in decision making

Exe.15 The questions raised by the planning proposals of a development corporation are often similar to those raised by a local authority, for example the impact on local tenure patterns and housing needs, heritage and green space. There are differences, however. A development corporation is likely to want greater flexibility than is possible through a conventional development plan. Local civic societies may have to monitor proposals in circumstances where these suddenly appear or disappear.

Exe.16 Housing should not be provided in isolation; it must be considered and planned together with employment opportunities, the local environment and the relevant infrastructure requirements, including GP surgeries, and schools. As a result, it is legitimate to ask questions that go beyond 'how many homes?' in each area to assess the community impact. Raising questions about community impact is, of course, not an obstruction for its own sake: It is a reflection of the active involvement of people who care about their neighbourhood, their village, their town or city.

Exe.17 Houses in Multiple-Occupation (HMOs) are often ignored in local development plans and in national and local design guidance. Given their role in the housing market, for example in providing accommodation for lower-income and also for highly mobile, young people, local societies and local authorities should only

seek to prevent HMO conversions on a limited basis where environmental problems have become apparent. Local societies should also seek to influence local authorities to ensure that planning and environmental/ housing staff work together in maintaining acceptable standards of equipment, internal layout and management.

Exe.18 The publication in 2026 of a draft statement of 'Design and Placemaking Planning Practice Guidance' (the PPPG), alongside the revised national planning guidance (the NPPF) marks a new emphasis on clarifying urban design requirements. In this context:

a) Local societies should take advantage of the provisions for local design panels in the draft PPPG, seek the creation of design panels where these do not exist and seek their involvement in the panels once created. They should also take advantage of other opportunities for involvement.

b) A local society should be most careful when faced with arguments for relaxing amenity standards or for making standards more locally flexible. Insisting on acceptable amenity standards is not NIMBYism. It is a means of encouraging good quality housing for the long-term.

c) Local societies are concerned with the built environment and their membership contains many older people. They are therefore in a good position to campaign for better planning for elderly people. As part of this, they should insist that the 40 per cent requirement for Category 2 (accessible and adaptable) housing, as stated in the NPPF, is met on all sites involving the provision of 10 dwellings or more. Local societies might moreover consider how to pursue their campaigns with other local groups concerned with care and older people.

d) Finally, local societies should monitor how developers discharge their obligations to protect trees, hedgerows, water features and biodiversity and report failures of compliance to the relevant authority, where these failures have harmful consequences.

Exe.19 The mission of Civic Voice means looking to how government should best promote environmental stewardship and improve the built and natural environment. In this context, government should:

a) promote the better use of the unused and underused existing stock for housing, including historic buildings, introducing practical measures that will encourage and help owners undertake the relevant work;

b) encourage local authorities to pursue policies for new build and policies for the rehabilitation of older housing stock in tandem with one another;

c) ensure that speed of delivery is not the overwhelming criterion in supporting social housing schemes and make due allowance for the special characteristics of small-scale community-led projects;

d) recognise the variety of local housing markets, with greater local realism in the application of housing targets;

e) promote and require better, clearer and more easily understood policy statements in the preparation of draft plans and strategies, together with an obligation on planning authorities to explain the implications for local communities;

f) promote public understanding of environmental and place related issues, preferably in the context of a national educational campaign. Public education, and the need for clear communication, are sorely ignored in discussions of planning policy.

1. INTRODUCTION

1.1 The aim of this report is to examine the process of housing development from the viewpoint of civic societies and, more broadly other community organisations and consider how they might help to shape better outcomes. In doing this, the report provides guidance to local civic societies on how to deal with the housing issues that arise in Local Plans and in other, related, planning policy frameworks. The aim is to provide guidance, including examples of good practice, rather than to comment on policy, as Civic Voice, the national charity for civic societies, already does when regularly responding to new government consultations and draft policy documents.

1.2 The relationship between housing and planning is nearly always close. The very first planning legislation in Britain, the 1909 Act, was a joint Housing and Town Planning Act. The development of housing, including mixed use, has multiple implications for community infrastructure, community services and community planning. The relation is particularly close and topical now given a national shortfall in the rate of housebuilding, compared to national targets and the emergence of renewed complaints about the apparent constraints caused by the planning system and the role of civic societies and community groups within that system.

1.3 Suspicion of civic societies and community groups is evident in the past two years by the way they have been described, in an influential housing journal, as potential 'nay-sayers' and intransigent opponents to development,[1] by the abandonment of national financial support for neighbourhood planning,[2] by calls to reorganise public consultation towards opinion surveys and away from local groups[3] and by a failure in both the draft and the final statement of national planning guidance to consider the adequacy of community involvement as a test of whether a Local Plan or Spatial Development Strategy is sound.[4]

1.4 It is therefore time to restate the role of local civic societies and community groups in planning, outlining the legitimate questions that they might ask of proposals and planning policies, as well as the approaches they might take in the future. The recent criticisms of civic societies also provides an opportunity for reflection, a review of their role and an opportunity to develop improved practice.

1.5 The report starts with a brief statement of the values and mission that inform Civic Voice. The report then identifies and discusses the main housing actors and the institutional vehicles that promote social and affordable housing. The role of civic societies in planning and the workings of the planning system comprises the next two sections. The report discusses placemaking and urban design and how civic societies might best respond to recent changes in national policy. The final section provides examples of schemes that local societies have commended.

2. VALUES AND MISSION

2.1. Civic Voice looks at housing from a particular viewpoint that is summarised in a constitution, mission and value statement agreed on 18 July 2026.[5] The statement has updated and clarified the aims and objectives of Civic Voice as a charity and by implication has done the same for local societies. Without summarising the full document, the revised constitution has the following aspects that are especially relevant to planning and housing.

2.2. The basic mission is to champion 'great places where communities are empowered to shape, protect and improve where they live'. The statement of values includes 'local stewardship' and 'constructive collaboration'. Further, the charitable aims include a commitment: 'To promote sustainable development and the creation of resilient, inclusive and well-managed communities.'

2.3. The pursuit of community empowerment means an emphasis on involvement in planning and decision-making and a preference, wherever possible, for locally controlled forms of housing provision. At the same time, the pursuit of sustainable development means the promotion of good planning principles, including mixed communities and social balance. Shortages of genuinely affordable housing are putting those ideals at risk. In addition, the pursuit of well-managed communities means that societies are also interested in the availability of housing for young people which is becoming increasingly difficult to access, especially in high priced areas.

2.4. Some contributors to the debate on housing and the built environment see the issues in binary, materialistic terms, of producers and consumers. However, the basic principle of democracy is that we are all active participants and housing in particular is not a sector that can be measured in simple terms. Of course, economic aspects are a central consideration, but so are the social, environmental, cultural and heritage aspects of what makes a place or a building something we are proud to call home. We are not merely consumers of the built environment, we are individually and collectively engaged in seeking to preserve what is good and ensure that our towns and cities meet the needs of a diverse population.

1 Derbyshire, Housing Today, 15 January 2026

2 Stanway-Williams, Cratus. 26.06.25.

3 Cooper & Oxley, Quick Wins, pages 26-27.

4 Civic Voice, Response to Open Consultation. March 2026. MHCLG, August 2026, clause PM14.

5 Civic Voice, July 2026.

3.

HOUSING DEVELOPMENT – INSTITUTIONAL ACTORS AND VEHICLES

3. HOUSING DEVELOPMENT - INSTITUTIONAL ACTORS AND VEHICLES

3.1. Increasing the supply of housing has been a central aim of policy in the past few years and is a reason why the planning system has been reformed and partly restructured in England since 2024. Increasing housing supply and accelerating the rate of housebuilding can be justified as a means of creating employment; having a multiplier effect on other economic activities such as the purchases of household furnishings and equipment, modernising the housing stock and coping with population change.

3.2. There are many reasons to encourage housebuilding. Civic Voice welcomes the broad aim of government policy. However, building more homes is unlikely of itself to ensure the most commonly cited benefit - a measurable short-term reduction in rents and prices to the point that housing becomes more affordable.

3.3. For example, the Office of Budget Responsibility (OBR) has assumed that 'net housing additions' (new build, plus conversions and subdivisions, minus demolitions) will rise markedly in 2027 as a result of planning reforms. Whether net additions will actually increase is another matter. The crucial consideration is that the OBR assumes that net housing additions in England will increase to achieve government targets, from under 200,000 dwellings in England a single year to over 300,000 dwellings. Yet house prices will rise over the forecasting period of five years 'broadly in line with growth in average incomes.'[6] In other words, a significantly increased housing supply over five years has such a small impact on prices and rents that its effect may be ignored. The reference to average incomes is an acknowledgement that inequalities in wealth and incomes are as important as shortages in causing affordability problems and tackling those problems requires direct intervention, most notably by building homes intended for low-income households.[7]

3.4. Reducing housing costs through new additions to stock is an attempt to remove the scarcity element in housing supply. The concept of a fully balanced housing market without shortages is purely theoretical. The actual operation of a fully balanced market is likely to vary from the theory, with new problems linked to the varying quality of the stock and to its location. For example, in the period between 2000 and 2005, a combination of low population growth and continued housebuilding undermined the market for older housing in the more depressed parts of the Midlands and he North of England, leading to calls for widespread demolition.[8] Yet demolition is commonly not necessary. Policies for new build and policies for the rehabilitation of older stock should be pursued in tandem and, in depressed areas, with a weak housing market, rehabilitation should have priority.

3.5. The existence of depressed housing markets has implications for how housing policy should be organised. Housing policy, including the housing aspects of local planning should recognise the diversity of local housing markets and the way, in addition, that these markets can change over time. In particular, the experience of London should not be treated as a standardised template for all English regions.

3.6. Civic societies are mostly interested bystanders and sometimes influencers in the process of housing development. They are interested in outcomes, but are unlikely to have the funds to deliver housing. Local groups also do not prepare Local Plans or spatial strategies, other than neighbourhood plans where different rules apply and communities can take the initiative. In fact, with the significant exception of planning (Section 106) agreements, the planning system is itself not a mechanism for delivering housing. It is instead a mechanism for coordinating and encouraging provision by others. Faced with the prospect of a planning application for new or additional housing, a local society might well ask some very old questions: 'who pays and who gains?'

6 OBR. March 2026, p. 36, para. 2.37. The exact figures used by the OBR are not stated. The scale of the projected target varies according to whether the reference is to dwellings built and completed or net additions, including conversions and subdivisions.

7 Buchholz, et al. 2026.

8 Goodchild, 2008, pp. 248-249.

The actors

3.7. There are two main types of developer - private and social housing developers. There are also subdivisions within each type and these may change over time. In the private rented sector, for example, build-to-rent housing has emerged in the past ten years, transforming the skyline of larger regional centres. Social housing agencies have also changed and are now strictly speaking defined as either the housing departments of local authorities or Private Registered Providers (PRPs). Since PRPs commonly use substantial proportions of private finance, the language applied to their development is also contested, raising the question as to whether it can always be regarded as social housing in a meaningful sense.

3.8. However, as a simple starting point a binary, private and social distinction, is appropriate. The characteristics of each type of developer is shown in Table 1.

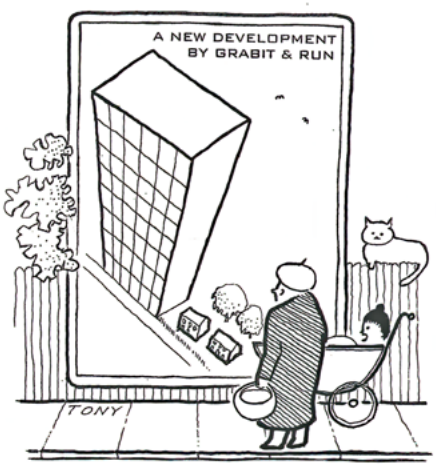
Table 1: Main institutional actors and housing development

Actor	Scale of activity	Activities - key features
Private housing developers – comprise volume housebuilders and small and medium enterprises (SMEs) housebuilders	Volume housebuilders – 14 largest companies delivered 80- 90,000 new homes in 2025/26 (75%+ of private house completions)	Land banking Range of funding sources Obtain planning permission including S106 Build out rates depend on the state of local housing markets Joint ventures and partnerships Some volume housebuilders have construction divisions
	SMEs (defined as producing < 200 homes per year): 5,000-10,000 new homes in 2025/26	Local contacts / networks to find small sites Housebuilders and construction work Partnerships with local authorities and / or PRPs
Housing associations – the legal term is not for profit private registered providers (PRPs). They are diverse - national, regional and local providers as well as those meeting specific needs (eg older people) There is also a small but growing for profit PRP sub-sector	At the end of March 2025, not for profit PRPs owned nearly 3.3 million homes. Those owning > 1,000 homes (17% of all housing associations) owned 96% of homes Not for profit PRPs are estimated to have completed nearly 43,500 homes in 2025/26	Funding from government grants (via Homes England), borrowing on the financial markets, and in-house including cross-subsidy from market rent and market sale Reliance on purchasing properties from private developers through section S106 Joint partnerships with local authorities and private developers
Local authorities – Currently subject to local government reorganisation.	All local authorities have an enabling role for other providers through the planning system, land ownership and partnerships 160 local authorities currently could develop new homes, but are completing only 2-3,000 per year. The future housebuilding capacity of local authorities is very varied.	Local authorities that are developing new homes generally use their own land for development They may have in-house teams to undertake development activity, but consultants are often commissioned. Construction companies and contractors are normally used for building work
Construction companies – organisations that build houses and other forms of development Diverse sector ranging from multi-nationals comprising many separate legal entities through to SMEs	There were over 370,000 registered construction companies in England in 2024 employing 1.4 million workers	Large companies may have housebuilding divisions that are sub-divided geographically or by type of scheme They may also have divisions focussing on project management etc

Private developers

3.9. Much of the puzzle and tension of housing policy is that housing is treated by governments as a public good whose provision is to be encouraged as desirable for society, but it is mostly developed by private firms whose actions inevitably cause overspill effects (or externalities as it these are called in economics), meaning implications for other activities, other individuals or the environment. The potential existence of overspill effects means that private interests and the public interest are not always aligned. Any misalignment or conflict between private and public interests can, to an extent, be resolved by planning controls, by other regulations and by financial incentives. But the tension never completely disappears. Ideally, planning should seek to maximise the public benefit from private development whilst minimising any negative impacts.

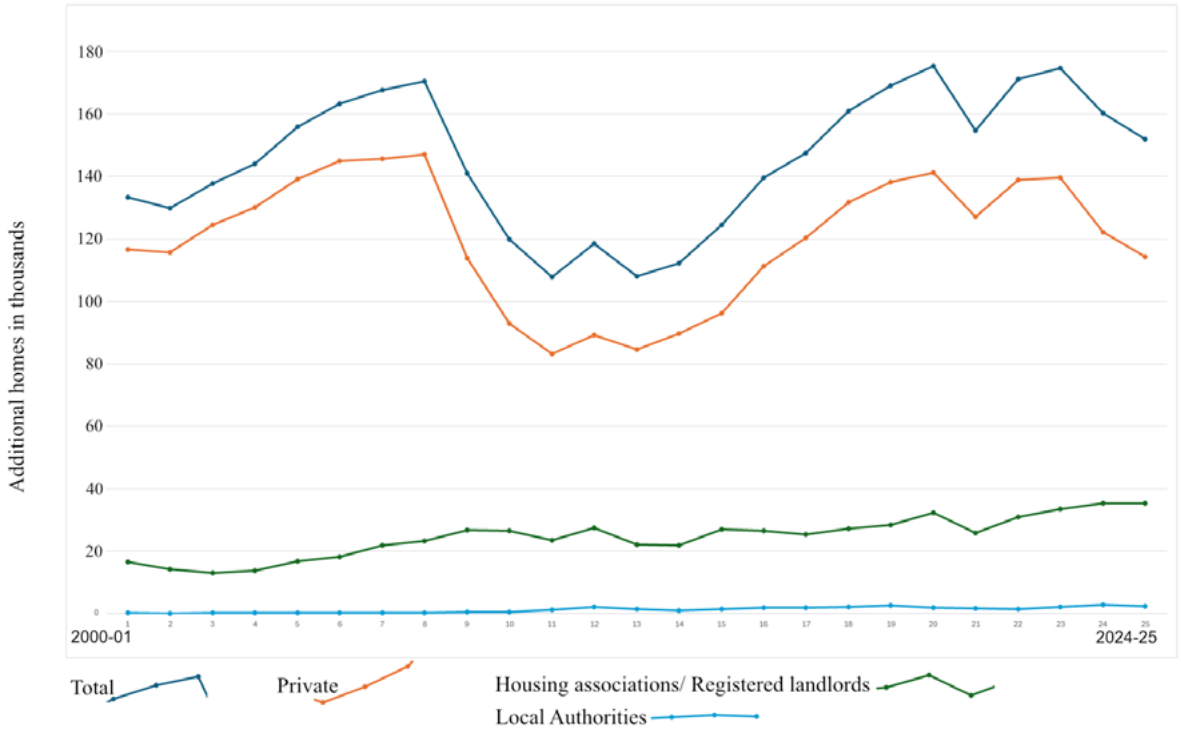
3.10. Moreover, the very process of aligning a private development process with the public interest and of minimising negative external effects is likely to be seen as a constraint by developers. This has, in turn, led to regular calls for 'deregulation' or at least greater certainty in the scope and application of regulatory measures (of which planning controls are the most important at the local level). What appears as red tape to a developer is commonly a necessary means of environmental protection to a community, however. People care about their local environment.



"Granny, would the Red Tape have stopped this?

3.11. In any case, it is arguable whether regulation can be completely certain. The form of regulation is subject to changes in national policy in response to social and environmental concerns. In addition, the housebuilding industry is itself subject to uncertainties, notably swings in output caused by investment volatility. Figure 1 shows recent tendencies in private housebuilding completions, as well as those of housing associations (Registered Landlords) and local authorities.

Figure 1: Housebuilding completions in England



3.12. Private developers are aware of the multiple risks involved in finding sites and in construction. They are also dependent on borrowing and for this reason are dependent on the risk assessments made by banks and other financial investors. All these risk assessments in turn favour investment in types of development that have worked in the past, on the use of flexible, commonly used construction methods and on locations where prices are high and therefore mortgages are easily obtained.[9] Private investment is also preferred in areas where public investment is planned or has taken place. As a result, developers are commonly risk averse in terms of innovation in design and construction methods, and in location, unless the public sector is involved.

3.13. The task of development is a process of integrating different activities. The 'classic' form of development is for a firm to raise development finance from a bank or another source and then to organise the whole process of site assembly and planning, design, construction and marketing, with the initial borrowing costs recouped on sale to a consumer, either an owner-occupier or a landlord.[10] Implicit in the classic model is that the developer has to anticipate the scale of demand and generally avoids flooding the market with a large number of completions at any single time. The classic model is the basis of countless suburban and low-rise housing schemes. Despite the process being called 'housebuilding', construction itself is only part of the process.

3.14. Reference to an integrated process of development is an oversimplification, as integration is never assured. The task of the developer is to ensure integration whilst undertaking subcontracting if this is less expensive or easier. Given subcontracting, firms may also specialise in any one or more of the different stages of site identification and assembly, design or construction. The use of specialist contractors, at the design and construction stages, is common in more complex forms of development, such as high-rise flats or large-scale renovation. Construction companies also provide non-residential schemes and are significant economic actors in their own right.

3.15. It is also possible for the project stages to be reversed, with initiation from the consumer rather than a developer. Self-build exemplifies this for owner-occupation. The owner-occupier raises finance and then undertakes development, again contracting out design and construction as appropriate.

9 Ball, 2010, pp. 60, 121
10 Ball, 2010, pp. 51-52.

3.16. The build-for-rent sector offers another reversal of the classic model. Here projects are provided by the management company using specialist contractors and underpinned by institutional investors. The build-for-rent sector has been almost entirely targeted toward single adults and childless couples and is itself subdivided by market, with a recognised less expensive 'student housing' sector (also called purpose-built student accommodation – PBSA). Student housing in this context does not necessarily mean accommodation built for or occupied by those in full-time education. Build-for-rent schemes increased sharply from about 2010 to 2023, mostly in large regional centres but the rate of construction has subsequently declined, according to recent reports.[11]

3.17. Build-for-rent tends to rely on institutional investment from pension funds and others that seek stable, long-term returns. Otherwise, private renting is a management rather than development activity, with management undertaken by a varied mix of local entrepreneurs, small landlords and larger landlords. Privately rented accommodation is itself diverse as it covers all types of dwelling in the existing stock and is let to households of every type and every income level.

3.18. In terms of quality, private developers are able to generate adequate levels of consumer satisfaction, according to surveys undertaken by both urban design specialists[12] and by consumers specialists in the Competition and Markets Authority (CMA).[13] Most new residents are happy with their homes, though the CMA makes a qualification that, for volume housebuilding, consumers are, on average, less happy the longer they live in their new home.

3.19. In contrast, for large-scale development in particular, developers have proved less successful in generating approval from local communities or in providing well-designed estates. According to a large-scale survey of recently completed estates, local communities, as represented by local councillors for example, typically see what they term as overdevelopment and a loss of local character. 'Both residents and communities see a negative impact from unduly car and roads dominated environments' (sic).[14]

3.20. The continuing role of the developer after completion varies according to the type of developer and the type of scheme. For suburban low rise estates developers generally leave collective management and maintenance to others. Local authorities are increasingly unwilling, for financial reasons, to adopt communal facilities such as green spaces or sustainable urban drainage features, with all the management and maintenance costs that this involves. As a result, for low rise estates where leasehold arrangements are inappropriate, the CMA has noted that management and maintenance is handed over to a wide variety of mostly private agencies, each with their own charges, standards and sub-contracting practices. For the CMA, estate management practices will, in the long-term, require government regulation to protect the rights of residents as consumers.[15]

3.21. For flatted estates and for large-scale build-for-rent, the common parts of the blocks require collective solutions as a legal necessity. In the past, developers have enrolled buyers into a leasehold agreement with annual management and maintenance charges. Leasehold is likely to be removed as a legal option in the near future and a new legal model will be required as a result.

The social housing sector, including 'affordable' housing

3.22. Social housing means, in the broadest sense in the UK, housing provided either by a local authority or by a regulated agency. In England, the agency must be registered with the Regulator of Social Housing, responsible both for charitable housing associations and other providers. Otherwise, the definition of 'social' as a form of housing is contested. For Shelter, the main homelessness charity, social housing agencies do not necessarily build social housing as this would be understood by most people. For Shelter, the definition of social housing is more limited:[16]

'By social housing we mean social rent homes. These homes have rents linked to local incomes and provide a truly affordable, secure housing option for people across the country. We don't mean affordable rent, shared ownership, or any other so-called 'affordable' tenure.'

3.23. The issue that Shelter raises has roots in the history of UK housing policy. Until the 1970s the only type of social housing was housing for rent, with the level fixed below that available for equivalent property in the private sector. Local authorities were the main provider and built on a large scale, generally over 100,000 dwellings each year for England alone. Local authority estates were characterised by marked local divisions according to the quality of stock at a neighbourhood or street level.

However, housebuilding rates and the size of the existing local authority stock were sufficient to allow young people to register on a local waiting list and expect to occupy a low-rent home within a year or so.

3.24. Policy has subsequently changed in three main ways. First, local authorities have been replaced by housing associations as the main providers of social housing. Councils have recently built only a few thousand dwellings each year. Over the past ten years, from 2016 onwards, local authorities have completed between 1,830 and 2,660 dwellings each year.[17]

3.25. Second, the large stock of local authority housing built before 1980 has been diminished by the 'Right to Buy' policy that after 1980 enabled households to acquire the freehold at a heavily discounted rate. The operation of the Right to Buy was taken up in all estates, but led disproportionately to sales amongst more popular dwelling types and estates.[18] Sales were never countered by the construction or acquisition of replacement dwellings. In addition, some local authorities transferred their stock to housing associations.

3.26. Third, housing association output has, to an extent, changed in favour of forms of tenure that are intermediate between social housing, as for example understood by Shelter and market-based housing. From about 1975 onwards, local authorities and housing associations started to experiment with shared ownership properties, that is to say properties partly owned by the occupants using private loans and partly owned by the social landlord. In 1981, the same concept was taken up and promoted by the Ministry.[19]

3.27. Then from about 2000 onwards, housing associations experimented with the development of market rented property with finance borrowed directly from banks and financial institutions. Housing associations did this to reduce a dependence on social housing grant and in addition to facilitate urban regeneration.[20] Finally, under the Housing and Regeneration Act 2008, a new type of registered housing agency has been permitted. This latter provides 'affordable' housing, at 80 per cent of local market rents, but not affordable for lower income households and involving not just private borrowing but the distribution of profits to shareholders.[21] In contrast, social rented homes have a rent that is 50 per cent of the local market rate.

3.28. The creation of intermediate shared-ownership, market-rent social housing and affordable rent registered housing were all promoted as a means of promoting diversity in the social housing and rented housing stock. Market-rent social housing and affordable registered rented housing were also promoted as a means of facilitating investment. However, they offer higher rents and costs than social rented housing[22] and the latter has itself become less affordable in the context of the current cost of living crisis.

3.29. The intermediate, mixed economy forms of housing have led to a substantial, long-term increase in the number of homes completed by Registered Landlords. However, homes built for social rent are now in a minority. To quote the Resolution Foundation:[23]

'In the 1990s, an average of 42,000 social rent homes were built each year (79 per cent of the total). But during the 2010s, the tenure rapidly fell away: in the past ten years,78,000 social rent homes were built overall, a number that would have been achieved in less than two years in the 1990s, and equivalent to 14 per cent of the total affordable housing built.'

3.30. The shift has occurred in an effort to maintain social and affordable housing construction against a background of falling public finance support. It is unlikely to be reversed without a significant shift in housing policy priorities. The impact has been particularly marked in urban regeneration. Here, cost constraints imply a reduction in social rent housing at the neighbourhood or street level and this has been endorsed as a planning ideal by concepts of mixed-tenure estates.[24]

11 Savills, 21 November 2025.
12 Carmona et al. 2021, page 7.
13 CMA, February 2024, page 42.
14 Carmona et al. 2021, page 7.
15 CMA, February 2024, page 99-100.
16 Shelter. Undated.
17 Gov.Uk. Statistical data set: Live tables on housing supply: indicators of new supply. Table 213.
18 Murie, 2022, page 108.
19 Cowan, 2018.
20 Goodchild & Syms, 2003.
21 Smith & Ritchie, 2025.
22 Nanda & Parker, 2015.
23 Aldridge, Q3 2026, page 2.
24 Khazbak, 2025.

3.31. Local societies are sometimes invited to endorse regeneration projects that affect social housing estates. They should ask whether the existing residents will be offered, promptly, a home nearby. They should also ask whether the proposals will lead to a net increase in social rented accommodation (ignoring so-called affordable rented housing and shared ownership). Rehousing apart, redevelopment is commonly a stressful and drawn-out experience for residents and should only be endorsed as a last resort.

Homes England

3.32. Because all forms of social and affordable housing are, to a varying extent, built and managed outside the market, their development requires external financial support. Homes England, previously known as the Housing Corporation and the Homes and Communities Agency, is the single most important disburser of public funds and is also responsible for the National Housing Bank, established in 2026 and charged with making low interest loans for housing and loans where the market cannot help. The National Housing Bank is probably the vehicle for any expansion of either housing association or local authority housebuilding in the next few years.

3.33. The funding strategy of Homes England is determined either by the organisation itself, under the broad supervision of the MHCLG, or in London by the Mayor of London or, to some extent, by the Mayor of other major cities where special arrangements apply. Local authorities involved in major regeneration projects, for example in and around city centres, will almost certainly have to use the financial and marketing resources of Homes England, unless they wish to favour private developers building at market prices. Homes England has no obligation to consult local civic societies or any other local group.

Section 106 agreements

3.34. In addition, social and affordable housing relies on variable, negotiated contributions through the planning system. The contribution comes from developers, but indirectly the contribution comes from landowners and amounts to an attempt to use, for public benefit, the large increases in land value consequent in the grant of planning permission, increases that are also called 'betterment value' or 'value uplift'. The contributions are levied under section 106 of the Town and Country Planning Act 1990 and contained within legally binding Section 106 agreements between local authorities and developers. They may specify any form of local community benefit, including the provision of affordable and social housing. Developers offer the properties to housing associations and/ or local authorities for purchase.

3.35. In some cases, where the provision of affordable housing is impossible, planning authorities may accept a cash payment in lieu of housing. However, the desirability of cash payments under Section 106 is contested. In response to a consultation on the updated 2026 NPPF, Civic Voice pointed to various issues and risks involved in accepting cash payments.[25] The payment should be subject to rules covering the source, the amount and the date of collection, the intended use of any payment, whether the cash has actually been used and for what purpose. Further, fixing the size of a cash payment is not straightforward, especially in a context of inflation in building costs. Finally, cash payments should not be used because a developer wants to keep out lower income households. Local societies should be most cautious if faced with a suggestion that a local authority should accept a cash payment in lieu of social housing.

3.36. The proportion of social and affordable housing in new development is stated in the Local Plan and may be varied according to a defined housing price zone. The proportion is determined by assessments of project viability- a concept that specifies development expenses and costs (including a 'reasonable rate of return') should in total be less than the expected sales income. The 'reasonable rate of return' is not specified in guidance. A coalition of community groups in London suggest that a reasonable rate of return is 20 per cent.[26] Such a level it is suggested in the same report greatly restricts the amount of social housing associated with private schemes in London. Complaints about the use of viability assessments to suppress or reduce the provision of social housing have also been made in other areas.[27] Local societies are in a weak position to challenge the technical inputs to a viability assessment. They are entitled, however, to ask for the viability report and to see whether there are any obvious errors or omissions. The report consists of standardised elements and is not confidential.[28]

3.37. Section 106 agreements continue to provide a significant proportion of social and affordable housebuilding. According to the Resolution Foundation, between 2015-16 and 2024-25, private developers contributed 244,000 homes (45 per cent of the 542,000 total).

They did this, moreover, without recourse to additional funds from the affordable homes programme, as has been common in the past.[29] As with the broader affordable homes programme, there has been a shift away from the provision of social rent towards shared ownership and higher rent affordable housing.

From large to small housing developers

3.38. A long-term tendency has been towards the concentration of private housing development in a limited number of firms. According to the CMA, in 2021-22, the single largest builder, Barratt, supplied around 8 per cent of the UK market. The largest 11 firms together supplied around 40 per cent.[30] The industry has become more concentrated by virtue of the greater vulnerability of small operators to setbacks, including the global financial recession of 2008 and the COVID lockdown,[31] by the differential access of volume builders to institutional investment[32] and by the greater ability of large companies to secure land and navigate and exploit the complexities of the planning system.[33]

3.39. The social housing sector is less concentrated and the scale of building is much less. The journal 'Inside Housing' lists 50 big builders. The basic trend in the social housing sector is also towards mergers, as housing associations 'seek scale efficiencies and resilience' and smaller associations cope with financial and regulatory pressures.[34] Homes England, in particular, applies financial and regulatory tests that favour larger, developing associations.

3.40. Volume housebuilders and larger social housing agencies are likely to remain the most important source of additional homes in quantitative terms. In the future, local authorities may also start to undertake more development, depending on local and national priorities and the availability of finance.

3.41. Against this background, the case for smaller developers deserves consideration, in both the private and social housing sectors. In the private sector, smaller developers are less likely to use standardised house types[35] and more likely to increase variety through producing more niche types of housing. By 'niche' housing, the CMA refers to 'custom build houses and multigenerational houses.'[36] The niche role of small developers may also be extended to ecological housing and to housing in locations that are sensitive for heritage reasons. If small developer firms start to grow, this will moreover increase the capacity of the housebuilding industry. Smaller and medium sized (SME) private developers do not, in general, provide better quality housing in terms of build quality or consumer quality, according to the CMA.[37]

3.42. SME developers are private businesses. Unless they are acting in the role of contractors, they are unlikely to build affordable housing or for people in need. Even so, there are good reasons to encourage SME developers and this is recognised in the statement of national planning guidance, through the recognition of a need for plans to designate 'plots for self and custom build housing and community-led development.'[38] The remit of the Housing Bank also covers measures to encourage smaller housebuilders.

25 Civic Voice, Response to Open Consultation. Proposed reforms to the National Planning Policy Framework and other changes to the planning system, March 2026, questions 67- 70

26 Just Space, April 2026, p.7.

27 See, for example, Manchester City Society, updated 10 February 2024.

28 Coop, 17 May 2023.

29 Aldridge, Q3 2026, p.4

30 CMA. 26 February 2024, p.15.

31 Ball 201, p.125: Hammond, 7 June 2020.

32 Archer & Cole. 2021.

33 CMA. 26 February 2024, p. 153.

34 Newbridge Advisers., 2024.

35 Hooper & Nicol 1999.

36 CMA. 26 February 2024, p. 103

37 CMA. 26 February 2024, p. 153

38 MHCLG- National Planning Policy Framework. August 2016. Clause HO5.1.ciii.

3.43. The reference in national guidance to 'community-led development' is about alternative types of housing derived from the broader civil society sector, including local charities, trusts, housing associations and other local voluntary organisations, that provide not-for-profit housing in a way that reflects community values and user control. These small-scale schemes are especially useful for smaller urban sites or for village infill and expansion in rural areas. There are various types that overlap each other in their character:

- cohousing schemes providing self-contained housing units or rooms within a larger building or residential area, with shared facilities such as a kitchen, laundry and garden, all under resident management;
- group self-build where residents get together often with the support of a social housing agency to build affordable rented or owner-occupied homes to their own designs;
- co-operative housing where tenants make the key decisions;
- small-scale rented or shared-ownership projects developed in conjunction with a Parish Council;
- Community Land Trusts that separate land from building ownership, retaining the land in the ownership of a charitable organisation; and finally,
- sites and services projects where a Community Land Trust or other body provides clusters of serviced plots where households can control the design and construction of their own home.[39]

3.44. The different types of community-led housing suit different age groups. Cohousing, with its shared facilities, may be easily adapted to the needs of older people or to schemes with a mixture of older and younger people. Group self-build and site and services schemes are well adapted to the life-styles of younger groups who can enlarge or improve their home as economic circumstances permit or family circumstances require.

3.45. Depending on their financial strength, community-led groups undertake a wide variety of initiatives, including the purchase of individual properties and the conversion of disused and underused buildings. To undertake social rent schemes and in particular new build social housing, community-led housing groups commonly require technical support from larger, developing housing associations. Without such support, community groups are unlikely to access funds from Homes England.

3.46. Support for 'community-led and rural' schemes appears as a priority in the national funding programme of Homes England.[40] There are, moreover, various ways in which low-cost land might be offered to community groups- through conditions attached to rural exception sites, through the land acquisition activities of development corporations and through the disposal of local authority-owned sites and buildings. The House of Lords Built Environment Committee has called, for example, for innovative new communities in new and expanded towns so as to 'avoid the criticisms levelled at volume housebuilders'.[41]

3.47. The strategic priority of encouraging community-led schemes is less apparent on the ground. Community-led development can prove a lengthy exercise, lasting several years or more from the initial choice of a suitable site. Planning authorities often lack the experience or knowledge of how to process and assess 'exceptions' schemes. The very notion of an exception means that permission has to be carefully weighed and worded. Conversely, local community groups commonly lack the skills to navigate the planning system. The difficulties may diminish if community-led schemes increase in number, however. Local civic societies can support community-led development through publicity, through writing appropriate letters to local decision makers and through offering advice, notably on matters relating to heritage.

3.48. The constraints are not just material or driven by policy. Wanting to understand why there were so few examples of cohousing in the UK, the Select Committee on Housing 'asked witnesses what was preventing the establishment of more communities despite the demand for them.' The fundamental barrier, it was apparent, was 'cultural'. 'We are not used to people doing things for themselves, and certainly not housing and housing development'. Small-scale community alternatives deserve to be encouraged.[42]

39 Payne, 2022, pp.250-251.

40 Homes England, SAHP, updated 15 April 2026.

41 HL, New Towns: Laying the Foundations, 25 October 2025.

42 HC, 9 February 2018, p.48.

4.

CIVIC SOCIETIES AND PLANNING

4. CIVIC SOCIETIES AND PLANNING

4.1. The use of Section 106 agreements is an example of how civic societies and community groups encounter housing policy and housing proposals through the planning system. Local groups have no formal, legally recognised role in either the planning system or the development of housing. There is no duty on local authorities or anyone else to consult civic societies and to take their views into account. In the past, Civic Voice and its predecessor Civic Trust have campaigned for a formal role in the planning system and their efforts have been supported by the London Forum of Amenity and Civic Societies, amongst others.[43] That campaign did not succeed and as a result, Civic Voice no longer seeks a specific and unique formal role, but it does campaign for democratic and local accountability in planning and related aspects of public policy.

4.2. The absence of a formal role does not, of course, prevent local societies from promoting the accountability of planning authorities through making comments on plans and planning applications, and seeking to influence local decisions. Civic societies are member organisations that seek to promote the interests of the city, town or village in which they are located. Promoting those interests means promoting good standards of planning and as part of this promoting good quality housing. According to a survey, undertaken by Civic Voice for a consultation in 2019, over two thirds of member societies agree that more homes need to be built.[44] While opinion surveys are thin on the ground, there is no evidence that local civic societies are more hostile to new housing than the general public.

Democracy and so-called 'nimbyism'

4.3. Most planning decisions are taken by professionals in local government according to regulations created or endorsed by government. According to government research 96 per cent of planning decisions were made by officers in the second quarter of 2024.[45] In a District or Borough, the local planning committee comprising elected councillors can set the general direction of local policy, notably through a Local Plan. However, officers are responsible for most individual decisions under arrangements for the delegation of decision making. Moreover, local delegation arrangements have been confirmed and standardised following the Planning and Infrastructure Act.[46]

4.4. The delegation regulations have generated technical comments from the Local Government Association, an informed commentator, but no objections of principle.[47] Current arrangements for the delegation of decision-making to officers are not a major change from existing practice in many local authorities. However, Civic Voice has expressed its concern about the long-term implications of reducing local democratic control.[48] For example, if a Local Plan is ambiguous or silent on an issue, the risk exists that local councillors could lose control over planning decisions- a situation that the public will surely find incomprehensible. The perceived loss of democratic accountability and trust in local government will be harmful and will never be regained. In this context, societies should urge officers to refer matters to the planning committee if there is any uncertainty about the scope and implications of the Local Plan or any other policy statement. When making objections to a proposal, a civic society should state explicitly if it feels that a matter should referred to the planning committee.

4.5. As a further complication, some types of planning authority do not possess an elected planning committee. In Mayoral authorities, decisions are made by the Mayor and these decisions may override the decisions of local authorities for larger scale and strategic developments, for example housing schemes of more than 150 dwellings. The creation of Mayoral authorities and the increased powers given to existing Mayoral authorities have caused concern amongst local societies that they have lost or could cause the loss of personal contacts with decision-makers. There is no easy answer to this, though working relationships may become re-established over time. For Mayoral authorities, societies should inquire as how best to make representations.

4.6. In National Parks and development corporations, decisions are made by a Board that includes appointed persons. Where there is a Board, rather than a planning committee or Mayor, local societies should campaign for the voluntary and community sectors to be directly represented on the Board itself. For development corporations, government has accepted that community involvement and engagement is necessary. The question is how community involvement and engagement is organised and whether, in addition, the

concerns of a local community are recognised and met.[49] If necessary, local societies will need to work with other community groups to ensure representation.

4.7. Blaming the opposition of civic societies and amenity groups for a lack of housebuilding ignores the realities of decision-making in local government. The legal arrangements mean that local views may be overridden, either by a local authority or by a centrally appointed Planning Inspector on appeal. A House of Commons inquiry into the planning system noted a view of planning as an exercise in rubber stamping- that 'planning proposals are agreed to despite local objections'.[50]



"No I don't actually know what they want to build, but they said it met the government's new planning rules, so it doesn't matter what the public is saying, we've just had to rubber stamp everything and give them permission"

4.8. The use of such terms as 'NIMBYs', 'blockers' or 'naysayers' adds an element of insult to ignorance and is likely to be resented by local societies. Name calling lowers the tone of political discourse and encourages others to become abusive. Civic Voice is already aware of occasional abuse against those who object to planning applications. Civic societies and community groups comment on and sometimes object to a planning proposal because they care about the local environment. That sense of care is surely desirable.

4.9. A particular strength of civic societies and amenity groups is their local knowledge- of previous schemes, of local conditions, local concerns and of heritage. Yet the role of civic societies and the justification for their continued involvement in planning and other local affairs goes beyond the provision of information. Local civic societies are part of civil society and this is recognised by government as 'a proud part of our national identity' and 'essential for the shared pursuit of national renewal'.[51]

4.10. This latter endorsement, in the 'Civil Society Covenant' is significant in recognising that civil society groups of all types have a legitimate role in the planning process. Civil society groups, including civic societies help maintain democratic debate. They should feel free to oppose specific schemes or policies where they can show clear planning reasons to do so, and they should expect their views to be properly considered by the decision makers. Indeed, in planning, the limitations of current delegation arrangements and the existence of planning agencies that have limited input from local councillors (for example Mayoral authorities, National Parks and development corporations) make the existence of an independent community voice even more important.

43 London Forum, Newsforum, Winter 2019.

44 Civic Voice, Published Written Evidence, (FPS076), 2021.

45 MHCLG, Planning Reform Working Paper: Planning Committees, 2025, para.2, p.2.

46 MHCLG- Planning Committees and the National Scheme of Delegation of Planning Functions: Updated 1 June 2026.

47 Local Government Association. Planning committee reform, 23 April 2026.

48 Civic Voice, The Planning and Infrastructure Bill, April 2025.

49 Ibid, p.22-23.

50 HC, The future of the planning system in England. 27 May 2021, para. 66, p.34.

51 DCMS, A Civil Society Covenant, Updated October 2025. Summary.

Examples of the contributions of local societies

4.11. The labels of NIMBYs and 'naysayers' assume that those who object are motivated either by parochial concerns or self-interest. There are many occasions, however, when the existence of planning guidance and the imposition of conditions on the scale or form of development is either very much in the public interest or has enabled local communities to adapt to changing circumstances. Three examples will suffice.

4.11.1. **Coventry:** The development of student housing has led to concentrations of very small flats, that are unattractive to other types of household and are, as a result, at risk of high vacancy rates. In the city centre, for example, there is one scheme of more than 1,000 units, that has never been more than two thirds occupied. In response, Coventry Civic Society has campaigned against student housing along with others through the Local Plan making process, as well as through objections to specific applications. The Local Plan public examination is not yet complete. However, the society has ensured, on a provisional basis, that, under the new Local Plan, student housing will only be considered on sites within the university campuses or on land abutting the campus boundaries. Elsewhere, applicants must demonstrate that student housing proposals can be repurposed to other use.

4.11.2. **Wimbledon (London Borough of Merton):** faces substantial pressures for development in the context of an area that is already either built-up or where land is allocated to greenspaces and recreation, without unused industrial sites capable of being developed for housing. The Wimbledon Society is long-established and has pursued a long-term strategy for growth management and adaptation, complementing the policies and plans of the Borough. That strategy includes the completion of alternative Plan "Vision 2040, published in 2018., focusing on the town centre and prioritising the provision of more housing, the pedestrianisation of the main street and the maintenance of local character in the face of proposals for tall buildings. The society has also produced a range of local environmental surveys for residential streets in a conservation area, as well as design guides on front gardens and the provision of solar panels and heat pumps. To deal with proposals for so-called co-living conversions, otherwise knowns as houses in multiple occupation, the society has called on the local authority to prepare relevant policy statements.

4.11.3. **Bury St. Edmunds:** Here a local society has faced very large-scale expansion of what was once a small market town, with more expansion planned in the near future. The Bury Society has accepted the inevitability of expansion and has focused on a series of aspects of good design, including protecting local heritage, expanding essential community infrastructure and respecting landscape features on greenfield sites. To that effect, the society has prepared a 'vision for development' in association with the consultation on a Local Plan entitled 'West Suffolk Vision 2045'.[52] Significant developments in and around the town are expected to result in places with a 'Sense of Place and a 'Sense of Community'. The society has, however, no particular stylistic preference in new buildings but looks for good design in every element of a development, including sustainability.

4.12. Local societies do more than merely oppose new development. They participate in the preparation of planning documents, encourage urban development and sometimes manage open space. Here are four additional examples, involving either housing or a mix of housing and commercial uses.

4.12.1. Members of **Ilkley Civic Society**, **Salisbury Civic Society**, the **Vale of Evesham Society** and many other local societies have participated in collaborative, very local, neighbourhood planning exercises.[53] In 2021, a House of Commons inquiry gave a glowing assessment of the impact of such activities:[54]

'neighbourhood plans increased housing supply, improved the designs of houses, helped enhance consideration of housing for specific societal groups, improved local engagement with LPAs and contributed to placemaking beyond land use planning. Although they did not speed up the delivery of housing, they did foster greater acceptance by the community.'

4.12.2. **Merseyside Civic Society at Welsh Streets:** In 2024, the final phase was completed of a complex regeneration scheme for the regeneration of terraced housing in the Welsh Street area of Liverpool.[55] Completion of the scheme followed a long campaign from Merseyside Civic Society to avoid demolition, to secure the large-scale refurbishment of properties in poor condition, to bring empty housing into use and to enable the local community to live together. Faced with the possibility that nearly all the older terraced housing stock would be deemed obsolete, the society documented the strengths of the terraced house as a flexible place to

live at relatively high densities in layouts that are compatible with traditional urban landscapes. In doing this and through other campaigning work, the Society helped change local attitudes towards the retention and improvement of older housing and more generally helped show the potential of the older stock as a cultural asset.

4.12.3. **The Wakefield City Centre Plan:** Here the civic society took the opportunity to develop a strategy in advance of a master plan prepared by consultants for urban regeneration in the context of long-term decline in retailing. The society sought a distinct vision for the city centre, with an emphasis on cultural activities, a reduction in the number of retail units and an increase in the number of homes, secured through a combination of new build on carparks and the conversion of empty buildings. The civic society proposals were cited as an influence in the consultants' planning document.[56] The society also supplied an acting chair for the local town board, subsequently submitted a progress report to a House of Lords inquiry and was cited in the Lords report when it appeared.[57]

4.12.4. **Wetherby Civic Society at Spofforth Park:** As the Competition and Markets Authority has noted for other sites elsewhere, development at Spofforth Park left unresolved the long-term management of green spaces. Following the transfer of control of Spofforth Park Management Company to residents, a not-for-profit solution has been adopted with volunteer resident directors taking responsibility for overseeing the estate's communal areas, grounds maintenance, service charges and relationships with contractors, with the managing agent and the original developer. The directors give their time freely, balancing the need to maintain high standards with the importance of securing value for money for every household. The work goes well beyond routine maintenance. Residents have pursued the resolution of outstanding issues inherited from the development, supported the adoption of roads and drainage infrastructure, while responding fairly to residents' concerns about parking, property alterations, landscaping, safety and neighbourhood amenity.



Volunteer ground maintenance at Spofforth Park
© Malcolm Gardner, Wetherby Civic Society

4.13. The examples shown above have broad implications for local societies. Local authorities are invariably key players in coordinated approaches to planning and housing. Cooperation with local authorities has, moreover, become more necessary since the withdrawal of independent national funding for statutory neighbourhood plans. Local societies should work with local authority planning staff (if they are receptive) to build up trust, so that they see the Society as a positive if critical friend. That role of critical friend can help authorities when it comes to making difficult, complex judgments, for example about heritage assets.

52 The Bury Society, August 2026.

53 Ilkley Civic Society, Planning: what we do. Consulted July 2026: Ilkley Council, The Adopted Neighbourhood Plan and Policies Map: Salisbury Civic Society, The Neighbourhood Development Plan.

54 HC, The future of the planning system in England. 27 May 2021, Para. 47, p.28.

55 Merseyside Civic Society, 2024: Merseyside Civic Society, August 2016.

56 Farrells. This is Wakefield. 2021; Wakefield Civic Society. Our Vision. 31 January 2021.

57 HL, High streets in towns and small cities. Written evidence from Wakefield Civic Society (West Yorkshire). 2024: HL, High Streets: Life beyond retail. 28 November 2024

4.14. The management of land, as at Spofforth Park, Wetherby, or in the growth areas of Cambridge and the management of heritage assets are particular examples of how local societies can supplement the work of local authorities. Property management is a distinct and labour-intensive type of skill, however. It will almost certainly involve the employment of full-time staff and not all societies can do or would want do this.

4.15. Property management apart, local societies can pursue ways of promoting a pride in place in a way that complement the publicity efforts of a local authority. They can do this through documenting local history, through publishing walking trails for residents and visitors and through posting blue plaques that reveal the association between place and historical figures. Undertaking annual or biannual design award events also complements the work of local planning and conservation departments in promoting quality in the built environment.

4.16. In addition, the lesson of the examples is to highlight the importance of communication and publication (on a website or a distributed email/ newsletter). Societies should always communicate and publicise their activities in relation to planning. They should publish all their letters commenting on, supporting or objecting to planning proposals. Publication of communications on the website of a local society has become increasingly important as some local authorities no longer publish all comments on the planning portal. If they can, local societies should also formulate general statements of what they like and dislike – and why. Communication and publications inform the public who might otherwise be unaware of the work on the society; they maintain the confidence of society members and increase their influence with local councillors and planning officials.

Encouraging public involvement

4.17. A further argument against involving the public, including civic societies, in planning is that very few people are prepared to become involved and that participation is skewed towards particular groups, with younger people less likely to participate. Instead of consultation, it is argued, government should encourage local authorities to undertake representative surveys and focus groups and remove or modify existing duties of consultation.[58]

4.18. The opposing argument has multiple components. It is not just the planning system where a small number of people seek to influence policy and yet few complaints are made about this. Most national pressure groups operate in a similar way. Activists, whether in party politics or pressure group politics, are generally small in number if measured against the national population. The pressure groups representing the development industry amount, for example, to a small minority of the population. Further, surveys and detailed consultation are complementary. Consultation generates ideas and insights, not available through surveys. Finally, to the extent that consultations favour elderly groups, more should be done to extend involvement to younger people and other groups that are less likely to become involved.

4.19. The actual number of people who engage with the planning system is subject to wide variation from different sources and is subject to the type of question asked. A House of Commons Inquiry has cited polling undertaken for the think-tank Demos, showing that 44 per cent of those interviewed had engaged with the planning system in some way.[59] The Demos estimate suggests that more than a small minority of people become involved in planning proposals.

4.20. Public engagement with the planning authorities would be easier if local authorities were required to promote public understanding and if, in addition, planning proposals were made against the background of a national educational campaign. Public education, and the need for clear communication, are sorely ignored in discussions of planning policy.

4.21. The preparation of a development plan is a prime example. Draft local planning documents can be obtuse or vague and they often lack illustrative material or even clearly presented statistical graphs and diagrams. Poorly written, poorly structured and incomprehensible reports deter involvement and will exacerbate any suspicion of planning proposals, even if those proposals are fundamentally acceptable. There is no excuse for this, given that the development plan is the main vehicle whereby a local authority, as an elected, democratic body can express a view about the direction of urban development. If civic societies find local authority planning documentation, including the documentation prepared by consultants, to be difficult to understand, they should say so and press for a clearer explanation with evidence.

4.22. Many civic societies offer adult education through heritage walking trails. They offer

the service free or for a minimal charge. Only a few exceptional societies offer educational initiatives in relation to community planning or where children and young people are the intended audience. Moreover, despite the recent interest of the Lords Built Environment Committee in the subject,[60] there are no detailed national studies or surveys of efforts by public or voluntary organisations to educate children and young people on issues relating to urban design, planning and the environment. Most likely, there is a patchy pattern of such efforts largely dependent on purely local commitment.

4.23. In the past, educational efforts in planning and the built environment were more common. The Civic Trust, the predecessor of Civic Voice, was able to publish an educational broadsheet 'Making Place' from autumn 1988 to spring 1990, with practical examples in which children were directly involved in commenting on specific plans and proposals. The subsequent constraints on such activities are most obviously a lack of resources and staff, both at a national level for Civic Voice and for local societies. The requirements of the national curriculum and the complexities of the child protection, vetting procedures are other constraints.

4.24. The exceptions, those few societies able to become involved in education, include Birmingham Civic Society, its work being enabled by a combination of personal commitment and some external support from Birmingham Business School. The civic society has an explicit aim to 'educate the public in the geography, history, natural history, culture and architecture of the city' and, in addition, to promote the concept of active citizenship among the people of the city. Promoting citizenship amongst young people is described as being 'at the heart of the Society's work and involves a major programme, the Next Generation Awards, aimed at 11-14 year olds, which is free for all schools across Birmingham to enter.' A typical programme of study would encourage young people to 'work in groups to devise a plan to improve one aspect of life for people living in Birmingham' and 'then to develop a five minute presentation' on the subject.[61]

4.25. Civic societies should encourage local authorities and consultants to tailor public engagement to the preferences and activities of children and young people. Otherwise, in educational projects, an emphasis on citizenship is surely the correct approach. Education for involvement in planning is distinct from the education necessary to prepare for membership of a built environment profession. Involvement in planning and in the future of a community is part of democracy.

58 Cooper & Oxley, July 2026. page 35.

59 HC, Housing, Communities and Local Government Committee, 27 May 2021, paragraph 67, page 34.

60 HL, House of Lords Built Environment Committee, Policy letter. 25 June 2026.

61 Birmingham Civic Society, *Impact Case Study*. 10 November 2017.
Birmingham Civic Society. *What we do.*

5.

WORKING WITH THE PLANNING SYSTEM

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5.1. Planning may be defined in the broadest sense as the management and promotion of urban development, with a series of specific characteristics- an orientation to the future, a set of actions or regulations to achieve a desirable future and the use of a spatial diagram or map-like plan. Planning as practiced in most countries has these same or similar characteristics, but planning practice also involves legal requirements and procedures that define the powers, rights and duties of different parties. The National Planning Policy Framework, the latest edition of which dates from August 2026, is the single most important regulatory document in England, but there are many others. The legal requirements and procedures comprise a complex array of documents that have to be read in relation to one another and where the exact wording influences the outcome.

5.2. As a result, accounts of the role of civic societies in planning inevitably involve an examination of the wording of policy statements and regulations, what they say and sometimes what they fail to say.[62] In addition, as in the assessment of Section 106 agreements, 'viability' and its close associate 'deliverability' are commonly key constraints on the detailed selection of sites, on density and on the provision of amenities.

The development plan and 'material considerations'

5.3. In terms of regulation, the existence of a development plan, generally comprising a written statement that culminates in a policies map or spatial diagram, is the distinguishing feature of statutory planning, as opposed, for example to building or public health controls. In its present form, the development plan comprises the Local Plan, the Minerals and Waste Plan, if separate from the Local Plan and the Spatial Development Strategy (SDS). Neighbourhood Development Plans are also part of the development plan if prepared on a statutory basis.

5.4. Taken together, the different types of plan provide the main framework for determining a planning permission and the key to promoting both accountability and consistency in decision-making. More generally, the development plan provides a potential framework in which developers and local groups can act co-operatively in promoting good quality development. Co-operation is more difficult if developers make unexpected proposals outside the adopted plan - a tendency that is more likely if a development plan is out-of-date. Finally, though this is seldom stated in government documents, development plans facilitate investment through increasing the capacity of different parties to deal with uncertainties.[63] The existence of an up-to-date, locally adopted development plan is a necessary condition for a well-managed and effective local planning system.

A discretionary system

5.5. There has been a slight change in the wording of the national guidance. The National Planning Policy Framework (NPPF), published in December 2024, defined 'the statutory status of the development plan as the starting point for decision-making.'[64] In contrast, the August 2026 version of the NPPF has a longer, more complex statement, as follows:[65]

'Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The national decision-making policies in this Framework are a material consideration in making these decisions and should be read alongside the policies in the development plan. Planning decisions must also reflect relevant international obligations and statutory requirements, as must the preparation of development plans.'

5.6. The wording in the legislation has not changed, as the NPPF recognises. The development plan remains the first consideration in making a planning decision, unless material considerations indicate otherwise. The term 'material considerations' has no single statutory or regulatory definition and is variable according to its policy and development context.

As a simple starting point for a local civic society, a material consideration may be defined as any impact that a development might have on the built or natural environment or on the quality of life and amenities of a population.

5.7. The aims of the planning system are tied to

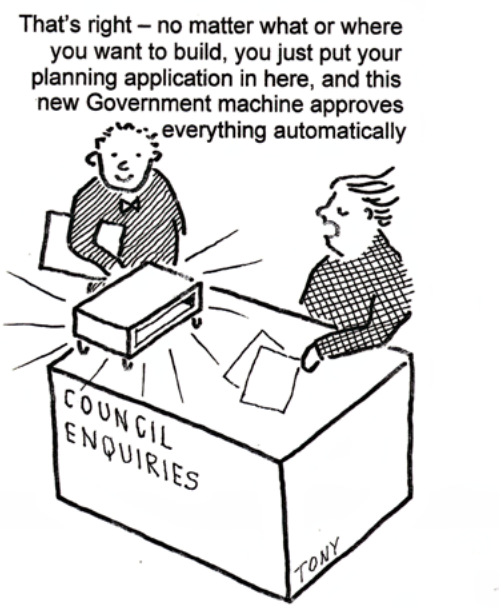
three different dimensions of sustainable development as defined in the introduction to the NPPF- the economic, environmental and the social.[66] The definition of a material consideration will likewise relate to one or more of these three dimensions. The economic includes development viability, as is apparent in many other clauses in the NPPF, so setting a tension between viability and the environmental and social aspects of development.

5.8. Determining the balance between economy and viability on one hand and the social and environmental dimensions of sustainable development is undertaken on a proposal-by-proposal basis, using the development plan, the NPPF and other policy statements as an interpretative frame. However, viability also depends on the price that the developer has paid for a site and not just planning criteria. Schemes may become not viable because the developer or in some cases the development industry has assumed a continuing property price inflation that does not materialise. Viability may change over time, for example between plan making and subsequent implementation and if proposals become non-viable, say because inflation on building costs outstrips house price inflation, development may be delayed or prevented in a way that offers no easy solution.

5.9. The proposal-by-proposal assessment of viability illustrates a general decision-making tendency towards a focus on specific developments. That focus implies a discretionary planning system rather than a zoning system as exists elsewhere in Europe and many other countries. In a zoning system, conformity to the provisions of a plan, and to the associated zoning regulations, amounts to automatic planning permission. In England the legal terminology is the development plan and other 'material considerations', not just the plan. The terminology in other UK nations is broadly similar, though with the addition of a national spatial strategy in Wales, Scotland and Northern Ireland and the absence of a specific, separate category of 'national decision-making policies' as included in the most recent edition of the NPPF in England.

5.10. A discretionary, proposal and development-focused planning system is not by its very nature 'rules-based and certain', despite the intention of reform as stated in the explanatory statement for the earlier draft of the NPPF.[67] Rules-based planning does not, in any case, always facilitate development. The designation of a Green Belt, for example, closely approximates a rule against most types of development, other than in 'very special circumstances'. At least the Green Belt amounted to a designation against development until the introduction in 2025 of an additional discretionary element based on the concept of 'grey-belt' land.

5.11. In 2020, a Planning White Paper proposed the introduction of a simplified zoning system in England, but this was abandoned after multiple objections from many different perspectives and groups, including Civic Voice owing to its negative impact on public involvement.[68] There is provision for local planning authorities to issue local development orders that grant automatic planning permissions for specific types of development or sites and so resemble the provisions in a zoning system. But the use of development orders would complicate design control and preclude the use of Section 106 agreements. Automatic planning permissions are, in any case, unlikely to be understood by the public. Development orders have as a result seldom been used by local authorities, despite active encouragement in the NPPF. Local societies should likewise discourage the use of a local development order.[69]



62 Dobson & Parker, 2023.

63 Lau, 2015.

64 MHCLG- National Planning Policy Framework, December 2024, page 7, para.12.

65 MHCLG- National Planning Policy Framework August 2026, page 3, paragraph 3.

66 Ibid, para.17.

67 MHCLG, Proposed reforms to the National Planning Policy Framework and other changes to the planning system. 2025, p.10.

68 MHCLG, Planning for the Future, 2020

69 Gallent, et al, 2021.

5.12. The explicit and prominent reference in the 2026 NPPF to international obligations is an innovation. The reference covers World Heritage Sites and this is to be greatly welcomed. Otherwise, the relevance of international obligations depends on whether they are recognised and brought into force by the UK government. For example, the Convention for the Safeguarding of the Intangible Cultural Heritage, was adopted at the 32nd session of the UNESCO General Conference in 2003, and now comprises the over-arching international legislation as regards such matters as folklore, local crafts, festivals and the spiritual aspects of land and nature.[70] However, while the 2003 Convention was adopted by the UK in 2024, it has not yet been brought into force by the UK Government. Until, it is brought into force, protection of intangible heritage is unlikely to count as a material consideration in planning.[71]

5.13. Separate provisions apply to the determination of 'nationally significant infrastructure'. Nationally significant infrastructure is unlikely to comprise housing, though its development may sometimes affect the amenity of nearby local communities, for example through increased traffic levels. A local society should seek assurances and planning conditions that will minimise or avoid negative amenity impacts. If a society wishes to go beyond local impact and object to nationally significant infrastructure on grounds of principle, it may be necessary to obtain specialist advice, for example from a relevant national campaign group.

Spatial Development Strategies and Local Plans

5.14. The different types of plan are summarised in Table 2.

Table 2: Types of statutory development plan

Type	Responsible authority	Agenda (from the NPPF)	Remarks
Spatial Development Strategy (SDS) including the London Plan	Mayoral authority/ Combined authority	'should set a positive vision for future growth and change at a sub-regional scale and provide a clear spatial framework for investment and growth, including for new housing.'	SDS was introduced under the Planning and Infrastructure Act: Backed by executive directions from the Mayor and in some cases Mayoral control over housing, transport and regeneration
Local Plan	District or Borough	'should set out specific proposals for accommodating development needs and conserving and improving the environment at a local level.'	Intended to support delivery of SDS: Involves detailed policies map
Waste Plan	District or Borough	'to facilitate a sufficient supply of minerals to meet society's needs and enable the delivery of sustainable waste management and a circular economy.'	May be combined with Local Plan. Civic Voice has recommended that the Waste Plan is normally combined with a Local Plan.
Supplementary planning document	District or Borough. London Mayor	Limited to … 'locally-specific design standards' and 'situations where it is important to put in place policies to shape and direct development for a site' or nearby group of sites.	Has to be specified in advance during the preparation of a Local Plan
Neighbourhood Development Plan	Neighbourhood Forum	To identify and address 'community priorities that can be met or supported through the planning system.'	Has to conform to the provisions of the Local Plan, the SDS and NPPF.
Non-statutory plans- masterplans, advisory plans, local planning statements	District or Boroughs. Masterplans are commonly prepared by developers in accordance with an agreed brief.	To guide design, to guide development in complex situations, to facilitate conservation.	Generally treated as a material consideration or tied to a planning application.

5.15. The plan is prepared in draft form by either a local District or Borough (the Local Plan and the Minerals and Waste Plan if separate from a Local Plan), or by a mayoral or combined authority (for a SDS). The London Plan is also a type of spatial strategy. Whatever the type of plan or strategy, a draft and the written representations are examined by one or two Inspectors who may then call a specific type of hearing called an Examination in Public into selected matters of concern. The Inspectorate sets the agenda for the examination and in rare cases may decide that a public examination is unnecessary.[72] After the draft is modified in line with the Inspector's recommendations, it is adopted by the relevant authority. In principle, a local authority can refuse to accept the recommendations of an Inspector, but this is rare.

5.16. The introduction of the SDS is the main recent plan making innovation, being derived from the Planning and Infrastructure Act, 2025. It is strongly oriented towards growth, and in particular a growth in household numbers and housing needs. At the draft consultation stage of the NPPF, Civic Voice stated that the SDS is not well adapted to areas in decline of which there have been many examples both in the UK and elsewhere in the world.[73] The NPPF as adopted makes a welcome reference to regeneration but still assumes a universal background of growth, without being clear as to what type of growth is under consideration- for example population growth, household growth, employment growth, housing price growth etc, etc.

5.17. The Local Plan is distinct in part because it shows specific sites on a map base. The SDS, in contrast, is intended 'to set a positive vision … at a sub-regional scale'.[74] Where a local plan is not present or out of date the NPPF plus the SDS form the initial policy basis for decisions. Even if the Local Plan is up-to-date and less than five years old, the SDS or an executive order of the Mayor may supersede a Local Plan. Progress with the preparation of a SDS is variable in different localities, owing to local government reform and is subject to transitional arrangements.

5.18. A Local Plan deals with the housing land needs of its area, the relation between housing and other land uses, the provision of community infrastructure, areas of land that deserve protection or for ecological landscape reasons, including Green Belts, National Landscapes and buildings and other heritage assets that deserve protection. The interest of the Local Plan for local societies is therefore broad.

5.19. It is appreciated that most civic societies and amenity groups often become involved in planning during the consultation stage that precedes a specific development. Residents may prefer to comment on actual proposals whose impact is more readily imagined. In contrast, the proposals in a plan and even more so in a spatial strategy may be abstract and long-term. The methodology used by local planning authorities may prove opaque. The Examination in Public may prove intimidating owing to the presence of developers, their consultants and legal advisers. Civic Voice has previously argued for a stronger recognition in the draft NPPF of the role of local groups in plan and strategy preparation procedures.[75] The NPPF as approved retains the same faults.

5.20. Public involvement in consultations after the approval of the Plan or strategy is often too late. The main decisions are already taken. Only points of detail are capable of change and are, therefore, subject to consultation.

"So just to get this quite clear Minister, your new Planning Act gives the developer automatic permission, but the public is still allowed to comment on the colour of the Geraniums?"



70 UNESCO in the UK, 2025/ 2026

71 Morley, 17 March 2026.

72 Planning Inspectorate, Updated 20 August 2026.

73 Civic Voice, Response to Open Consultation. Proposed reforms to the National Planning Policy Framework and other changes to the planning system. March 2026. Paras.6.2-6.5, pp.5-6.

74 MHCLG- National Planning Policy Framework August 2026, Clause PM1.

75 Civic Voice, Response to Open Consultation. Proposed reforms to the National Planning Policy Framework and other changes to the planning system. March 2026, para.Exe10.

5.21. In this context, local societies should be realistic. Opposing proposals that are already agreed in principle is not just futile; it suggests that a civic society does not understand how the planning system works and may also work against the interest of local people. Opposing a scheme in principle when it is already approved is likely to divert attention from crucial details that need to be changed to improve the quality of a development.

5.22. Once the Local Plan is adopted, and so long as its provisions are up-to-date and sufficiently detailed, its contents will generally determine the outcome of a planning decision rather than the views of the developer, a local amenity group or the views of the planning committee (if for example the Council changes party political control). Under current regulations about the delegation of decisions within local authorities, there is a presumption that proposals broadly conforming to a development plan will not be discussed by the planning committee, except perhaps as an item for information only.[76]

5.23. Societies should become involved in plan and strategy making from the start and should not wait to be consulted. Societies can prepare and issue position statements at any time. They can for example write to the chief planning officer and to councillors indicating their aspirations for their community. They should also contact Mayoral authorities, where and when established, as these are responsible for Spatial Development Strategies and in some cases are likely to acquire new powers for investment in transport infrastructure, housing and regeneration.

5.24. Societies should, moreover, encourage very local groups to become involved in plan and strategy making. Local societies might, for example, invite planning officers to explain the plan proposals to its members at a special meeting. Further, they should ask the relevant authority to explain and clarify any statements that they do not understand and insist that authorities use non-technical language in their explanation.

5.25. Local Plans can span the area of different local societies. Co-operation amongst different societies is not required under the legislation and national planning guidance. However, local societies might well find that co-operation makes their task easier.

5.26. Local government reorganisation into larger units makes co-operation between civic societies even more important. The SDS and the London Plan cover much larger areas than Local Plans and will raise issues where a co-ordinated approach from local societies is likely to prove beneficial, perhaps necessary. Other than in London and a few other areas, local civic societies are not well organised to address the issues raised by strategic spatial planning and in the future by strategic housing interventions pursued by Mayoral authorities.

5.27. Finally, civic societies whose area of benefit lies near the boundary of either a spatial strategy or a Local Plan should also assess whether any proposal from an adjoining planning authority adversely affects their locality and respond accordingly. In such cases, it is often helpful if the relevant local society can gain the support of their home planning authority.

Questions that local groups might ask

5.28. In plan preparation and in the preparation of spatial strategies, many of the reports and much of the discussion will deal with housing numbers and the identification of sites for their development. Global district-wide numbers are, however, often unhelpful in assessing the environmental or community impacts. Societies should press the plan-making authority to explain how projected housing numbers are to be delivered in each small area, so that a local society can see what it means, and what changes will be generated. Societies should also ask whether the draft plan has assumed distinct housing market areas or subdivisions and, if so, how those subdivisions have been worked out.

5.29. Housing should not be tackled in isolation; it must be considered and planned together with employment opportunities, the local environment and the relevant infrastructure requirements, including GP surgeries, and schools. As a result, it is legitimate to ask questions that go beyond 'how many homes?' in each area - to assess the community impact. Raising questions about community impact is, of course, not an obstruction for its own sake: It is the active involvement of people who care about their neighbourhood, their village, their town or city.

5.30. In the context of a plan or spatial strategy, relevant questions about community impact will generally start from a concern with vulnerable demographic and other groups, such as the elderly, children or those on low incomes, as well as concerns with the protection of local identity and amenities. To ensure that such general issues are framed to address a typical planning document,

questions should be specified in more detail, for example:

- what tenure and affordability mix is needed locally?
- are the viability assessments for affordable housing realistic and not too high?
- where should growth go so that it supports town centres, services and public transport?
- what infrastructure must come first or alongside development?
- how can new development reduce car dependency, flood risk and carbon emissions?
- does the proposed pattern of development favour brownfield sites, rather than greenfield?
- how do proposals make the best use of empty property, including empty or under-used heritage assets?
- how can schemes protect landscape, green spaces and biodiversity while still accommodating growth?
- in areas with a stagnating economy, how can the plan promote good quality development and create appropriate employment?

5.31. The balance between job creation and housebuilding also needs to be monitored and analysed. The ideal is to encourage a balance between the two so there is no net commuting either in or out of a district. Net balance means that the level of commuting in and out is roughly the same. An imbalance in favour of out-commuting indicates either a dormitory town or a depressed economy with all its implications, for example long journeys to work. An imbalance in favour of in-commuting will lead to pressures for more homes or higher prices or both.

5.32. Societies can and therefore should press planning authorities for a desirable homes / jobs balance. However, job creation and loss are not easily controlled through the planning system. Business closures are completely out of planning control. Business growth is heavily favoured by government, especially high-tech and advanced manufacturing. Societies can ask, however, whether a specific business development conforms to a local economic strategy and its priorities.

5.33. Lack of knowledge of the planning system and the necessary skills to contribute to the planning process, coupled with a lack of transparency by local planning authorities exacerbates a sense of distrust between residents and the relevant authorities. In this context, actively involving civil society and community-led organisations in discussions on the preparation of Local Plans and securing housing developments that meet locally defined needs, can rebuild co-operation between all parties. Some positive steps are being taken by community organisations and local authorities to engage with developers at the initial stage of proposals and this deserves to be promoted, but real change requires that community voices need to be heard at the policy and planning stages, not just at the development project level.

Neighbourhood Plans

5.34. Following the Localism Act 2011, local groups have been able to create neighbourhood forums that in turn allow the preparation of a Neighbourhood Development Plan. This is- a community-led statutory planning document intended to guide development and to be read alongside a Local Plan. Neighbourhood planning provides a vehicle whereby local groups can contribute in a positive way to the development of an area. The preparation of a neighbourhood plan in a statutory form under the 2011 Act is often a complex, time-consuming exercise. Statutory neighbourhood plans must, in any case, conform to the development and other principles of the Local Plan and national guidance.

5.35. Until the spring of 2025, government made available funds to support the preparation of Neighbourhood Plans, but this support has now been withdrawn. While the possibility of preparing a statutory Neighbourhood Plan remains, the cost of doing so is a major deterrent. New Neighbourhood Plans are likely to be few in number. The cost of revision is also a deterrent. The current generation of Neighbourhood Plans will not become obsolete overnight. They will, however, gradually lose their relevance unless reviewed or re-done.

76 Herbert Smith Freehills Kramer. 24 June 2026: The Community Communications Partnership. National Scheme of Delegation – A Real Shift in Planning Power.

MHCLG- Planning Committees and the National Scheme of Delegation of Planning Functions: Updated 1 June 2026.

5.36. In the absence of national funding support, local groups have various options. They might persuade a local authority to sponsor or prepare a neighbourhood plan or a similar very local plan that will count as a 'material consideration'. Under regulations issued in 2026, it is possible, for example, for local authorities to prepare supplementary plans that, in principle could cover neighbourhoods.[77] In regeneration projects, a masterplan could provide a workable alternative, for example, so long as it is based on extensive local consultation. In areas covered by the current 'Pride in Place' regeneration programme, government has proposed the creation of a wider type of very local plan that covers the social infrastructure of a place, including health and educational facilities.[78] A Pride in Place neighbourhood plan goes beyond the scope of the planning system but is likely to count as a 'material consideration' when assessing planning applications in such areas.

5.37. Elsewhere, local groups might consider undertaking neighbourhood plan revision on an informal non-statutory basis in a way that uses local volunteers and can avoid the most onerous legal procedures of a new statutory Neighbourhood Development Plan. In such circumstances, a local society should again press the authority to treat the informal plan as a 'material consideration'. Even an informal plan can encourage a local community to think about the future. Otherwise, local groups should seek to ensure that neighbourhood requirements are directly recognised in a Local Plan and SDS.

Plan revision

5.38. Local Plans commonly have a plan horizon of about 15 years into the future. However they risk become out-of-date long before the end of the plan period. National guidance is to 'start preparing a new plan, at the latest, every 5 years following the adoption of the previous plan.'[79] Guidance also specifies various reasons why plan revision should be brought forward before the end of five years.

5.39. Planning authorities have, in the past, been notoriously slow to undertake plan revision. The process is expensive in terms of staff resources, may open-up unwelcome disputes about how to cope with change, it nearly always takes place against a background of national policy uncertainty and sometimes proceeds in the context of organisational uncertainty, such as local government reform. Just letting a plan gradually become obsolete is no answer, however, as it makes a local council vulnerable to developers cherry-picking unallocated development sites, irrespective of the consequences. Without an up-to-date Local Plan, local authorities are less likely to be successful in opposing a development on appeal.

5.40. The introduction in national guidance in 2025 of a new category of land considered suitable for development – 'grey belt' sites located within the Green Belt - is a particular spur to revision. The rationale for grey belt designation is apparently straightforward. There are some areas within the Green Belt which are in poor environmental condition or are not being used to their full potential. All this suggests that a debate about limited development in the Green Belt is needed. However the scale of grey belt designation is contentious.

5.41. Under national guidance, the debate about the determination of grey belt sites would usually be the responsibility of the local authority or a group of local authorities, to be undertaken after a survey.[80] Piecemeal adjustments are allowed at the time of a development application. However, the possibility of piecemeal adjustments should not provide a justification for developers to fragment the Green Belt into small parcels.

5.42. In any case, it is wrong to assume that all Green Belts have boundaries that are fixed in perpetuity. In some areas, Cambridgeshire and West Yorkshire for example, Green Belt land is released for development every time a Local Plan is updated, with decisions based on a range of factors including transport links, access to services, and the quality of the Green Belt itself. Pushing development towards grey belt sites ignores the possibility that other Green Belt locations are more suitable.[81] Local societies should therefore insist on authorities undertaking a review of the Green Belt as this will of itself include an assessment of potential grey belt sites.

5.43. New guidance and plan making regulations, also published in 2025, makes it more difficult for local authorities to postpone the preparation of a Local Plan.[82] Governments have shown that they are more likely to intervene if Councils neglect their plan making responsibilities. As of 2024, ten Councils were subject to government intervention because of unsatisfactory progress on Local Plans, especially on housing land allocations.[83] In addition, nine Councils have had their ability to make decisions on major planning applications suspended because of inadequate

performance.[84]

5.44. The grey belt provisions, and other ongoing changes associated with the NPPF, suggest that civic societies should press planning authorities to revise Local Plans, if they are not already doing this. Failure to revise and prepare Local Plans is a denial of the right for civic societies and community groups to comment on the direction of development. Preparing a revised plan does not mean the abandonment of all previous elements; for example, the local design code could be largely retained. The preparation of a SDS depends essentially on the degree of preparation of the Mayoral authority and is more variable. Outside London, spatial strategies are necessarily likely to be slower to appear owing to their novelty, their dependence on the existence of a Mayoral authority, resourcing constraints and the lack of a published national timetable.

5.45. Once an announcement is made indicating the likely preparation or revision of a Local Plan or SDS, local societies should seek a meeting with officers to determine the timing, form and scope of community engagement and consultation. The main statutory framework for engagement and consultation is the Statement of Community Involvement. Civic Voice is concerned that, in their current form, Statements of Community Involvement have become out-of-date, too wordy, often ineffective and do not receive the attention that they deserve in a public examination of a plan or spatial strategy.[85] The application of the Statement of Community Involvement to a SDS has, in particular, received little attention. Local societies should therefore remind authorities of their relevance and assess how these should be updated.

Questions for specific proposals

5.46. Once a development proposal comes forward in the context of an up-to-date development plan, the range of relevant considerations becomes more limited. The main questions are:

- Does the proposal comply with all the provisions of the development plan?
- If not, do other material considerations justify a departure from the adopted plan?
- Does the proposal comply with all aspects of the national decision-making policies as stated in the NPPF?
- Is the proposal acceptable in terms of conventional site-specific requirements such as access, drainage, biodiversity, open and green space etc.?
- Does the proposal conform with local and national design guidance?
- Are there any implications for heritage assets?
- Is adequate infrastructure in place and if not how will it be funded?
- What conditions or section 106 obligations are needed?

5.47. In existing urban areas, and especially in growing cities and suburbs under development pressures, local societies should anticipate problems of scale and character with new development. Keeping to the status quo may be comforting, but scheme viability, housing targets and the NPPF may require higher densities. Good design will mitigate the impact of new development. Societies should try to suggest ways forward, though this will probably require some design skills. In areas experiencing development pressures, societies should also press the authority to stick to standards of daylighting, privacy, energy, plot density, tree replacement, open space protection, etc. when dealing with developers' applications, whilst accepting that the local authority may be in a difficult position when it has to choose between character and standards versus numbers of units.

77 UK Statutory Instruments, 2026 No.186.
78 MHCLG, Guidance: 12 August 2026.
79 MHCLG, Guidance: 30-month local plan process: an overview. Last updated 26 March 2026.
80 Gov.UK, Guidance Green Belt, Updated February 2025. Paragraph 003.
81 Civic Voice, The Grey Belt, 11 November 2024.
82 MHCLG, Guidance: 30-month local plan process: an overview.
83 Upton, 10 January 2024
84 Carey, 15 June 2026
85 Civic Voice, Published Written Evidence, (FPS076), 2021, para.6f: Parker, et al., 2021.

5.48. In making representations, local groups should be aware that the developer or a consultant working on their behalf may well have been in discussion with local authority planning officers before the application is published, sometimes over many months. The aim, from the developer's viewpoint, is to avoid or correct the most obvious faults and failures of a proposal. Preapplication discussions may involve commercial confidentiality and are usually not published. However, some authorities, notably the City of Westminster (London), does publish the advice given to the applicant at pre-application stage.[86] Local societies should seek local authorities elsewhere to make a policy declaration that they will also publish pre-application advice after a specific date.

5.49. If developers are sensitive to the wishes of a community, they may also seek informal discussions with a local civic society or other group, for example on heritage issues. Local societies should welcome the opportunity to talk directly to developers and influence proposals at an early stage. Care should be taken, however, that the society has a clear and agreed position on what is acceptable in specific circumstances.

Development corporations

5.50. Alongside local authorities and largely outside the current framework of development plans, government and mayoral authorities may also establish a development corporation. This label covers a diverse range of institutional vehicles intended to promote urban growth, house building and regeneration. They are essentially ad hoc in that each is established for a specific purpose. They can cover inner city areas or former currently redundant industrial zones, large urban regeneration projects, greenfield sites, freestanding new town projects; urban extensions, large scale suburban projects, or the whole area of a District to aid economic regeneration. They can be controlled by a Mayor or directly by MHCLG. Each is likely to have separate development and housing targets. Mayoral development corporations are becoming more common, especially in larger urban areas where the mayoral form of local government is now well established.

5.51. In some places, the use of development corporations is controversial and has probably become less feasible owing to the opposition of District or Borough Councils. The diversity of development corporations and the diversity of proposed sites have prevented Civic Voice from articulating a comprehensive national policy response. In any case, both Civic Voice and other external bodies, notably the House of Lords Built Environment Committee, have mostly been concerned with proposals for new towns, including 'in-town' new towns established to promote urban regeneration.[87]

5.52. Civic Voice has noted that the development of new towns is likely to offer a limited solution to the task of increasing house building and completion rates. Development is a long-term process and, in most cases, will only lead to the completion of additional housing after many years, and continuing for many years thereafter. In some cases, the introduction of new towns into an already complex planning system causes confusion, so delaying investment. If the designation amounts to a substantial departure from existing and previous planning policy, the proposals may not be able to command widespread public support. Local civic societies are well placed to test local opinion and to work out an appropriate response. Finally, if the policy commitment wavers during the long period of implementation, or if public investment is withdrawn, the new town is unlikely to be built.

5.53. The questions raised by the planning proposals of a development corporation are often similar to those raised by proposals elsewhere, for example the impact on local tenure patterns and housing needs, heritage and green space. There are differences, however. A development corporation is likely to seek, from the outset, greater flexibility than is possible through a conventional development plan.88 Local civic societies may have to monitor proposals in circumstances where these may suddenly appear or disappear.

5.54. Moreover, the scale of investment raises additional questions about who gains and who does not. Attention should be paid to the extent to which the housebuilding and job creation programmes meet the needs of local people, through for example the provision of social housing and training. Further, given limited public funds, designation may merely act as a concentration and focussing of development and regeneration on small areas, rather than an increase in investment over an urban area or district. In this context, the SDS, under the control of Mayors, and in London the London Plan, have a role in ensuring balanced development. The need for such development is a further reason why local societies should become involved in the preparation of strategic plans and should seek

to identify local priorities. If a development corporation is about to be established in their area, local societies should make inquiries about how existing amenity and other groups are to be represented and how they can ask questions to clarify future strategy.

Dealing with housing targets and land supply

5.55. Spatial Development Strategies and Local Plans assess housing needs and requirements, terms that are broadly synonymous with each other, with the SDS (when fully operational) providing the overall framework. The SDS and Local Plan also work within national policies that determine housing needs and land allocation for housing. There are three elements. The 'standard method' specifies how needs are to be calculated. In addition, local authorities have to demonstrate the existence of an adequate supply of land, usually a five year supply. Finally, the 'housing delivery test' measures subsequent progress. Of these three elements, the first two, the standard method and the five year supply of land are the most important.

5.56. The standard method was first introduced in 2018, as a belated replacement for the housing needs projections made in the defunct Regional Spatial Strategies that had been abolished in 2010. However, in December 2023 after opposition from local authorities, the standard method was deemed an 'advisory starting point', relaxing the impact on local planning.[89] At the same time, the requirement for finding an annual five year housing supply was weakened for authorities where an up-to-date plan was in place, or was close to completion and adoption.[90]

5.57. In July 2024, after a change in government a stronger, more centralised policy framework was imposed on local authorities and this remains in force in the current NPPF.[91] As before, the policy has three components: the identification of overall needs, the identification of a five year supply of land and the measurement of subsequent progress. The standard method is now mandatory and provides housing targets for all local planning authority areas. In addition, the government reestablished the requirement for a five year, annually updated supply of housing land. According to a government press release, the fundamental rationale for the revised policy framework was to raise housing delivery to 300,000 units a year.[92] Though seldom made explicit, the target applies to England rather than the other UK nations or the UK as a whole.

Calculating local targets and land supply

5.58. In its present form, the standard method ignores household and population projections in favour of an approach that relates housing needs wholly to the size of the existing stock and to house prices and rents. The number of homes in each area is said to increase by an average of 0.8%each year, so giving a baseline target figure. That baseline figure is then adjusted to reflect the affordability of homes in the area. with data on median workplace-based affordability ratios, published by the Office for National Statistics at a local authority level.[93] No adjustment is applied where the ratio is five or below. For each 1% the ratio is above five, the housing stock baseline is increased by 0.95%. The impact of the adjustment is significant as the Office for National Statistics estimated in 2024 that 75 per cent of local authority areas had a ratio of more than five.[94]

5.59. The target in the standard method is for additional homes, not just new build. Housing needs and targets may be met by the conversion of non-residential buildings and by subdivision. Use of empty and underused buildings is, in any case, desirable to make the best use of resources and to protect heritage.

86 City of Westminster, updated 6 August 2026.

87 Civic Voice, *New Towns in 2025*, October 29 2025
HL-*New Towns: Laying the Foundations*. 25 October 2025.
HL-*New Towns: Creating Communities*. 26 March 2026.

88 UK Parliament, New Towns: Creating Communities. Para.56, p.19.

89 Rankl & Barton, 12 March 2024, p.5.

90 Valler & Phelps, 2025.

91 MHCLG, National Planning Policy Framework August 2026, Annex D.

92 MHCLG, Press release 30 July 2024.

93 Gov UK, Guidance: Housing and economic needs assessment, last updated 24 February 2025.

94 Office for National Statistics, 'Housing affordability in England and Wales: 2025 section 4' – March 2026

5.60. Therein lies a source of policy uncertainty. According to estimates made for Historic England, over a third of the government's housing target could be met through repairing and repurposing existing historic buildings, with more available in the pre-1919 housing stock and through the conversion of housing over shops.[95] The House of Commons Culture, Media and Sport Select Committee has reviewed and accepted those figures, suggesting that they amount to about half the national housing target and represent 'a missed opportunity for heritage to contribute to the local and national economy.'[96] For the Select Committee and for others,[97] the older building stock is also a cultural and economic asset.

5.61. Societies should therefore ask whether local authorities have included all net additions in their estimates of recent housing performance and how they have made the relevant estimates. The national statistics for net additions to the housing stock, as prepared by MHCLG, are based, in part, on figures reported by local authorities or by the Greater London Authority.[98] Outside London, Districts and Boroughs have therefore made an estimation of net additions and this should be available for the preparation of plans and spatial strategies. A full calculation of net housing additions also involves the subtraction of the number of demolitions - a reminder that the older housing stock should not be allowed to decay to the point that demolition becomes inevitable.

5.62. Though conversions, subdivisions and the reuse of empty property constitute a significant proportion of the net additions to the housing stock, the estimates from Historic England suggest both local authorities and government underestimate their potential. Local societies should not go to the other extreme and exaggerate the potential. Changes in national policy and in housing policy priorities are almost certainly required to realise the numbers envisaged by Homes England and any such changes would not be considered at a public examination of a plan or spatial strategy, only the recent trend in conversions, subdivisions and reuse and the evidence of the likelihood of that trend continuing over the plan period. To give a specific example, the number of office to housing conversion schemes is determined in part by the number of suitable office blocks and this latter number is finite.[99]

5.63. The second aspect of local planning for housing requirements is the demonstration of a five year supply of land for new housing, with a 5% 'buffer' for flexibility and 20% where there is evidence of 'significant under delivery'. The five-year supply requirement arose from the previous national policy in which local housing targets were discretionary. In terms of practical land allocation in a development plan, and so long as the Local Plan is up-to-date, demonstration of the existence of a five-year supply should be met by the overall standard method target number. Conversely, if the adopted Local Plan predates the introduction of the 2024 targets or, in the unusual situation that housing targets are met through conversions and the use of empty property, the absence of the five-year housing supply is likely to justify new allocations and to hinder the refusal of planning permission on additional sites, even if these sites had been deemed unsuitable in the past. Local societies should therefore press authorities to publish local studies of housing starts and completions in relation to the allocated land supply.

5.64. Converting housing targets into land requirements involves making assumptions about residential densities. There is no specific standard or density range on this, other than around 'well connected' railways stations and tram stops. Authorities are assumed to adopt either the density of recently completed schemes in the locality or the planned density in different local areas. Local societies should press authorities to make their density assumptions explicit and, when published, should assess their validity.

5.65. The five-year supply of land is for 'deliverable sites' a term which again assumes a determination of what is 'deliverable' and 'viable'. Local groups should examine in detail how the land requirements associated with the plan targets are calculated, as volume developers may press authorities to underplay the potential of brownfield sites and small sites in favour of larger greenfield sites. The scale of brownfield sites in relation to housing needs and requirements varies between local authorities, with the greatest concentrations in larger towns and cities outside London.[100] However, judgements have to be made about the realism of brownfield sites being used in the immediate future, say five years. If the sites are unlikely to be developed on current trends, an assessment is also necessary as to whether policy measures are likely to be available to encourage development.

5.66. The third aspect, the housing delivery test, is a type of backstop that is intended as a lever to facilitate the granting of planning permission

on additional sites, outside the development plan allocations, where completions in a local planning authority area have fallen below those expected. It is a 'material consideration' that has to be read along with many other site-specific and strategic considerations, for example; design, highways, flood risk, heritage, biodiversity, landscape and impact on neighbours. The harm caused by a proposal against any of these factors would have to be balanced against the benefit of providing additional homes. Given that it is a material consideration, rather than a planning permission in itself, the test also shows the importance of local communities voicing their concerns if they find a proposal to be unacceptable. However, where building rates have fallen behind targets and especially where they have fallen seriously behind targets, the presumption is to grant permission, generally through an appeal.

A mismatch between targets and performance?

5.67. If the local targets are added together, the 2024 standard method produces, for England alone, a figure for housing need of just over 370,000 new homes a year, well in excess of the national target of 300,000 homes (or 1.5 million homes over a five-year Parliamentary term).[101] The targets issued in July 2024 were therefore deliberately optimistic, significantly so: they were far in excess of the maximum number of net additions achieved since 2000- just under 250,000 each year (See Figure 2). The standard method was altered again in December 2025, with a redistribution amongst local authorities, but with no significant difference for the national target.

5.68. Figure 2 shows trends in net additions since the financial year 2000/ 01. Since publication of the 300,000 target in 2024, net additions have fallen. Annual housing supply in England amounted to 208,600 net additional housing units in 2024-25, a 6 per cent decrease on 2023-24. Of these 208,600 additional units, 190,600 were new build and the rest changes to the use of the building stock.[102] Separate statistics are compiled for the housebuilding industry; these are estimated on a different basis and show that completions were lower still, falling from 160,330 units in 2023-24 to 152,040 in 2024-25.[103]

95 Historic England, 5 March 2025.

96 UK Parliament, 13 July 2026: H-C, Culture, Media and Sport Committee. Protecting built heritage.

97 Localis, 2026.

98 MHCLG, Net Additional Dwellings, Table 118: Annual net additional dwellings and components, England and the regions, 2000-01 to 2024-25. Sources and data collection

99 Ellwood, February 13 2026.

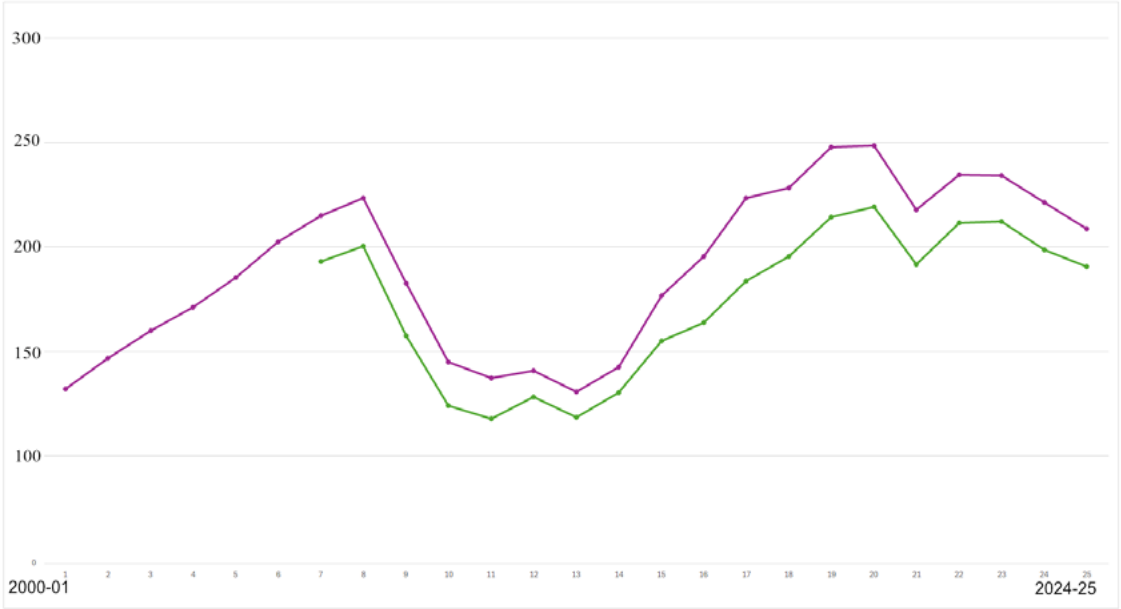
100 Armstrong et al, 24 July 2026.

101 Haynes and Clarke, 12 December 2024: Strategic Land Group, May 7, 2025.

102 MHCLG, Housing supply: net additional dwellings, England: 2024 to 2025, 20 November 2025.

103 MHCLG, Table 2b - House building: permanent dwellings started and completed, by sector, England, financial year. Consulted August 2026

Figure 2: Net additions to the housing stock in England



Total net additions
Net additions through new build

Total net additions is new build completions plus net conversions plus net change of use plus net other gains less demolitions plus adjustment to census. MHCLG Live Table 118

5.69. The impact of new targets and new housing land allocations may still take a few years to work through the system. The Office of Budget Responsibility in its economic projections for 2025 and 2026 states that increased land allocations will eventually increase net additions to the housing stock to the 300,000 target. The expected date for target realisation has been postponed, however. The 2025 OBR report stated that the target would be reached in the financial year 2029/30. The 2026 report postpones target achievement to 2030/31.[104] Further delays in reaching the target may also occur, given reported financial difficulties amongst the volume builders. Moreover, even if 300,000 net additions are realised, this is well below the cumulative total of all the local targets of 370,000 net additions.

5.70. The downturn in net additions and housing completions is not huge in a historical context and if examined as the average for all English regions. The downturn was much larger, for example, after the financial crisis of 2008 (see Figures 1 and 2). Cyclical downturns are recurrent in investment in housing.[105] The downturn has been sharper in terms of housing starts and sharper still in London than elsewhere. The essential failure is that the targets were unrealistic from the outset.

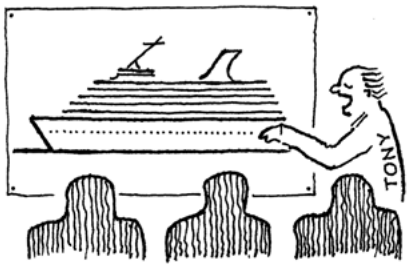
5.71. The downturn in net additions and housebuilding completions coincided with the introduction of policies to liberalise the planning system, most notably through allowing development on so-called grey belt sites within the Green Belt. Neither the planning system in its present form nor the opposition of local groups can therefore be said to have caused the downturn. The impact of the changes to the planning system may, in any case, never be clearly apparent as there is a host of other factors that impinge on the construction of new dwellings, for example high interest rates facing suppliers and potential customers, mortgage availability, the existence of government schemes to increase mortgage availability and reduce borrowing costs, funding for affordable housing, skills shortages at various points in the development pipeline, cost and / or shortage of building products and the collapse of construction companies. Inflation in building costs and uncertainties about further building cost inflations have been a particularly potent constraint on investment in the past few years.

Application of the 2024 target

5.72. Civic Voice has had significant reservations about the 2024 targets. Local authorities cannot always identify and implement actions for increased delivery (given that most supply is led by the private sector and associated

market decisions) and the creation of a persistent gap between land allocation and completions weakens plan implementation and conformity to planned spatial patterns. Earlier national planning guidance allowed planning authorities to avoid meeting the target in full, if other policy considerations restricted development.[106] However, the relevant 'get out' clause has been removed. The absence of household or population projections in the standard method is another concern.

5.73. The housing targets have been worked out as a national average, with the only local variations related to affordability. Yet, housebuilding will always be weaker where developers find more difficulty in finding sites, for example in existing built-up areas such as many parts of London, or in Districts with National Parks or National Landscape areas or in economically depressed areas where house prices are low. In some places, the targets look out of touch with reality.



"I just can't see any other way we can meet the Mayor's new housing targets, but our little river will need some dredging"

5.74. The difficulty of meeting targets has led Civic Voice to argue that, in plan making and plan monitoring, the tests of adequate housing land allocation should be amended to allow for housing market studies to determine the causes of actual or expected under delivery.[107]

5.75. The national and local policy response is still evolving. The revised draft London Plan has, for example, adopted a pragmatic response to the housing targets, recognising local capacity and local viability as constraints and fixing an all-London housing target that is below that generated by the standard method.[108] By implication, therefore, the background analysis to the London Plan has shown that, under current economic conditions, a contradiction exists between the viability assessments that are a required aspect of plan and strategy making and the housing targets that are another required aspect. The contradiction can be resolved through the use of the affordable homes programme, but the sums available are limited.[109]

5.76. London may be a unique case. The draft London Plan may also indicate that city region strategic planning (via a SDS), will lead to more local leadership and flexibility. Of course, merely setting a target does not mean that the target will be realised. Even the reduced target in London may prove too ambitious.[110]

5.77. Another, legal objection arises from the concept of 'fettered discretion'. To cite the view of one local society:[111]

'The wider public law principle is that a public authority must not fetter its discretion. In British Oxygen Co Ltd v Minister of Technology, the House of Lords accepted that a public authority may adopt a policy to guide the exercise of discretion, provided it remains willing to consider whether the policy should not be applied rigidly in a particular case. Translated into planning terms, a local planning authority may properly give significant weight to housing targets, but it must not treat those targets as an inflexible rule which prevents proper consideration of the individual merits and harms of the proposal.'

5.78. The 'fettered discretion' argument is taken from general public law. The point is that a public body should not merely argue that it has to follow a general instruction. The merits of a specific case must also be examined. A public body must also use its discretion and determine the public interest.

104 OBR. March 2025, p.46, para.2.58: OBR. March 2026, p.36, para. 2.38.

105 Ball, 2010.

106 Cooper & Oxley, July 2026. Page 15.

107 Civic Voice, Response to Open Consultation. Proposed reforms to the National Planning Policy Framework and other changes to the planning system. March 2026. Para. 52.2, p.22.

108 Gayne, 16 July 2026: Mayor of London, London Assembly. Delivering the homes and neighbourhoods Londoners need (2026), 16 June 2025, Para. 3.21,

109 GLA Viability team. July 2026

110 Simons, 17 July 2026.

111 Gardner, 20 May 2026.

5.79. Some caution is required. It has not been possible to determine whether any case law exists, applying the same argument to housing targets. The 2024 housing targets, together with the method on which they are based, remain in place as part of national planning guidance. Moreover, the fettered discretion argument cannot be applied directly to proposals that are either consistent with a development plan or made as part of the preparation of a development plan. In assessing a Local Plan, for example, an Inspector will generally ask for realistic alternatives and assess the harms, benefits and needs of any specific proposal. If there is no up-to-date development plan or for proposals that are a departure from a development plan, the various considerations in the updated NPPF will provide the main basis for how a local authority determines a planning application. If the local authority grants permission, the fettered discretion argument might be applicable to a judicial review, but this is an expensive and therefore risky method of objection for a local group.

Build out rates

5.80. A consequence of the slowdown in housing starts and completions is the repeated abandonment of projects that have planning permission and that might have otherwise gone ahead. A failure to implement planning permissions or 'slow build out rate' as this is also known, is a serious source of annoyance for local societies and this is recognised by government.[112] Unimplemented planning permissions serve warning that housing targets may be unrealistically high. In such circumstances, allocating more land for housing will do little or nothing to encourage a higher rate of housing starts and completions.

5.81. Local authorities can, however, do little to require the completion of an unimplemented planning permission. If a development has been delayed and not started there is no scope for enforcement as no breach of planning control has occurred. If it does not start and the permission lapses, or if a completion notice has effect, a developer could just reapply for permission which would have to be permitted unless circumstances had changed so the development had become undesirable. Once building work has started, enforcement against further delays is, in practice, impossible, unless a local authority can find the funds to acquire the site, preferably with the agreement of all parties and undertake the development.

112 MHCLG, Policy paper Planning Reform Working Paper: Speeding Up Build Out. Published 25 May 2025.

6.

PLACEMAKING AND URBAN DESIGN

6. PLACEMAKING AND URBAN DESIGN

6.1. The promotion of housebuilding carries the risk of prioritising growth over placemaking. The risk is that issues such as accessibility, community facilities, green infrastructure and the provision of employment become an afterthought. If, moreover, the rate of housebuilding increases in the immediate future, as government wishes, the design of new development is likely to become more important in determining the character of all types of settlement in England. The publication in 2026 of a draft statement of 'Design and Placemaking Planning Practice Guidance' (the PPPG) alongside the revised national planning guidance marks an effort to clarify the role of urban design in government thinking and policy. The implication is that design issues are material considerations in determining a planning application. Local societies should use the new national guidance, along with local design policy statements to improve the quality of new development.

Aspects of urban design

6.2. In part, placemaking involves urban design and the material aspects of landscape such as spacing standards, access to greenery, local parks and children's play and the liveability and adaptability of the building stock. Considerations relating to hard landscape are widely recognised aspects of planning. Placemaking as a material exercise also encompasses 'place building', the task of coordinating different developers and providers. This latter may, to an extent, be undertaken by a consortium of developers. However, places also depend on public services, so implying co-ordinating efforts within the public sector and between the public and private sector.

Criteria and metacriteria

6.3. Good urban design as a physical, material exercise is subject to a large specialist literature. The criteria that can and should be applied to test housing quality are so numerous that they cannot be listed separately, other than in textbooks and professional statements of good or bad design. The criteria may, however, be grouped together into broader categories or 'metacriteria'. The current draft of the design guide for England (Design and Placemaking Planning Practice Guidance or PPPG) gives 'seven features of well-designed places', each with an associated implied policy aim.[113]

- **Liveability** – healthy, mixed and integrated communities;
- **Climate** – mitigating and adapting to change;
- **Nature** – enhanced and optimised;
- **Movement** – accessible and easy to move around;
- **Built Form** – a compact and connected pattern of development;
- **Public Space** – safe, social and inclusive;
- **Identity** – attractive and distinctive.

6.4. Some aspects of placemaking cut across multiple criteria. For example, green space provision is relevant to liveability, nature and public space. The provision of green space, greenery and trees is much valued and its loss, caused by overzealous street management measures as well as urban development can damage the character of an area.



"Yes, a pity, but branches can fall and injure people - so we had to trim it"



Yes, it's a shame, but we are planting this new one to replace it of course

6.5. The list of design criteria in the draft PPPG amounts to a synthesis and consolidation of many standard works, with which most students of the subject would be familiar. The works include material previously published in official MHCLG guidance, notably in the National Design Guide and the National Model Design Code, Parts 1 and 2. [114] The influence of earlier classics by Lynch, Cullen or Gehl is also apparent.[115] Civic Voice has welcomed the consolidation of design guidance as a simplifying exercise and an educational device for developers and local authorities, but has suggested that the contents should remain advisory rather than mandatory and should not be considered as the only source of relevant advice.[116]

6.6. To an extent, the list of criteria in the NPPG and the draft PPPG has responded to changes in practice and to issues, that have been discussed in the wider placemaking literature for some time, but not incorporated into official guidance. For examples, the wording of the final adopted draft of the NPPF includes an additional requirement that 'public space' be designed for the safety and security for 'women and girls'.[117]

6.7. Likewise, the references to 'climate' and 'nature' are relatively new in the history of governmental guidance, but not in the wider literature. The references to climate and nature mark a green urbanism sensitivity, distinct for example from the regeneration design agenda derived from the report of the Urban Task Force of 1999.[118] The protection of nature and the related questions of carbon reduction remain contested as policy aims and there are other urban design textbooks that go further in seeking to make cities and urban development compatible with nature.[119]

6.8. Moreover, local groups will find difficulty in seeking energy efficiency requirements beyond those incorporated into the building regulations. The wording in the NPPF remains restrictive. Any local requirement in favour of additional energy efficiency 'should have a clear and robustly costed rationale which shows that there will not be an adverse impact on the viability and deliverability of development'.[120] In addition, the wording of the NPPF does not require the re-use of existing buildings (rather than demolition) to save embodied carbon held in the structure and materials. There is no reference to a retention first policy. It is possible, however, for local authorities to say in a development plan that the reuse, retention and conversion of non-residental buildings to housing is supported as an aspirational policy.

6.9. Energy issues apart, revised guidance has substituted the concept of a well-designed place, in particular an attractive place with a distinctive identity, for 'beauty' as a criterion in the determination of planning applications. A reference to beauty was included in a previous edition of the NPPF, published in 2021, mainly in response to an earlier report entitled 'Living with Beauty'.[121] As used in the Living with Beauty report, 'beauty' was an educational device, a portmanteau term covering many different aspects of good design and became unnecessary once the detail was stated. Treated as a separate criterion, the judgement of beauty proved too subjective to be applied.[122]

113 MHCLG, Draft for consultation. Design and Placemaking Planning Practice Guidance. 2026, page 10.

114 MHCLG, updated 30 January 2021: MHCLG, updated 14 October 2021.

115 Cullen, 1971: Gehl, 2013: Lynch 1964.

116 Civic Voice, Response to Open Consultation. Design and Placemaking Planning Practice Guidance, March 2026, para. 6.11.

117 MHCLG, National Planning Policy Framework, August 2026, clause DP3.2f

118 Urban Task Force. 1999.

119 Beatley, 2011: Lehmann, 2010.

120 MHCLG, National Planning Policy Framework, August 2026, clause Pm13.biii

121 Building Better, Building Beautiful Commission. January 2020.

122 Carr, Planning Theory & Practice.

6.10. From the viewpoint of local societies, the application of the criteria is the crucial stage in the design process, rather than the list as such. A multiplicity of different design criteria, the interaction between those criteria, the use of slightly different terminologies in different official reports, of which 'beauty' is an example and the diversity of 'real world' situations, hinder the application of design criteria, as Civic Voice has previously argued.[123] Difficulties in application are moreover manifest in a recurrent confusion in local design guides and codes about whether the guidance is mandatory or discretionary, whether the provisions are codes or just advice and, as part of this, as to the correct and appropriate use of the verbs 'could', 'should', 'will' and 'must'.

6.11. The task of controlling or undertaking design is slightly easier if applied to a single town or district and easier still if applied through a masterplan for a specific project- a document that is generally intended to be enforceable. For this reason, Civic Voice supports the proposal in the draft PPPG for the establishment of local design review panels to report on the quality of proposals from the viewpoint of design quality.[124] Local societies should take advantage of local design panels, where these are established and seek their involvement. They should also take advantage of other opportunities for involvement.

6.12. Equally, local authorities should make more use of detailed neighbourhood and community-based design techniques in which the public are asked to prepare and assess potential alternative projects. Commenting on design criteria and expressing general preferences is a start, but does not deal with application to specific cases. The 'public' is a very general concept. It is likely that local authorities will have to organise consultation exercises aimed at specific social groups, including women and girls, rather than the general population. In addition, because the application of design criteria is potentially so variable, it is essential that individuals and local groups should retain the right to comment on specific proposals, as is current practice.

Conservation and heritage

6.13. Conservation and heritage issues are recognised in the NPPF and the draft PPPG, but not necessarily in a way that would be appropriate to a local society. It is best if local societies press local authorities to ensure that the list of designated Conservation Areas (CA) is up-to-date, that the designated area of each CA covers the full area worthy of conservation and that each CA has an adopted very local policy statement. Societies might also consider whether they could prepare their own guide or environmental assessment to complement the work of the local authority. Local societies are commonly well-informed about heritage and history and well placed to advise local authorities. The key issue in assessing planning and listed building consent applications in CAs is to ensure that proposals protect or enhance those features that give the area its qualities and significance.

6.14. Other heritage assets, including listed buildings and locally listed buildings also deserve special treatment, usually on a case-by-case rather than area basis. The updated NPPF does not explicitly identify heritage conservation among the circumstances in which Article 4 Directions may be used. Article 4 directions tighten the scope of planning control in defined circumstances. They have been used for example to protect locally listed buildings against demolition, even if they are sited outside a CA. For heritage specialists, the use of Article 4 Directions is an important means of protecting locally listed assets and the absence of any explicit reference to this might weaken controls.[125] Using Article 4 directions to protect heritage is not excluded, however. Local societies should press for their continued use where this is justified. Those Article 4 directions already in place will remain valid and local societies should continue to press for their use if conventional planning.

6.15. Keeping a local list up-to-date can also prove a problem. There is no regulatory reason why a local authority cannot modify a local list on a piecemeal basis. However, societies have reported that local authorities are reluctant to add items or modify the list. Again, the key issue in assessing applications is to ensure that proposals protect or enhance those features that give the heritage asset its qualities and significance.

Flexibility and rules

6.16. The consolidated draft design guidance, the PPPG, is, in its owns words, 'intended to support the application of policies in the NPPF'.[126] That means permission can be refused for development proposals that are incompatible with the objective of 'well-designed, beautiful and safe places, with accessible community facilities, public service infrastructure and open spaces.[127]

6.17. Demonstration of the case for refusal still

takes evidence and justification against policy statements, however. The problem with most private developments is that they are of mediocre quality rather than being badly designed. The most recent national survey of estate design, undertaken by Place Alliance, found only a very few that should have been refused planning permission outright. The same survey also noted that the refusal of permission for poor quality design could be reversed on appeal through demonstration of local housing shortages.[128]

6.18. As stated in the draft PPPG, the relevant criteria do not involve fixed standards. The provision of standards is a matter for the Local Plan, local design guides and local precedents dependent on the character and envisioned density and type of area. The absence of a prescriptive approach to standards and to density (other than around railways stations and tram stops) is to an extent helpful in promoting local accountability. However, Civic Voice has called for the preparation of indicative guidance to show the different standards that might be appropriate to different density levels and to explain how a drive for higher densities can be reconciled with the recognition of local character.[129]

6.19. The choice of standards has to be 'proportionate' to the problems and situation, to cite the NPPF.[130] However, the inclusion of relevant standards in a local policy statement and even better in an adopted Local Plan or Supplementary Plan increases the likelihood that an appeal will be dismissed. A local society should be careful when faced with arguments for relaxing design standards in the face of a cyclical downturn in investment or local market adjustment. Insisting on acceptable design and amenity standards is not NIMBYism. It is a means of encouraging good quality housing for the long-term.

6.20. For example, if a proposal goes ahead without the necessary greenspace or children's play space, the deficiencies may never be rectified. If a listed building is demolished or altered beyond recognition, it is lost forever. In other cases, cost cutting at the design stage leads to larger cost increases later, often at the public expense. The provision of access and liveability standards for disabled persons and the creation of sustainable urban drainage are examples of planning criteria where the cost of retrofitting is likely to far exceed the initial costs at the design stage.

6.21. Fire regulations were tightened after the Grenfell tower disaster, requiring two protected staircases for new buildings over 18m high amongst other new provisions. The new regulations have sometimes been blamed for increased costs and reduced levels of housebuilding, especially in London where high rise schemes are most common and where, in addition, development costs are high for other reasons.[131] Fire regulation is another example of how the cost of retrofitting far outweighs the additional building costs. It is an aspect of the building regulations, however, rather than planning and involves uniform enforcement across different authorities. Likewise, energy efficiency and low carbon design standards are mostly incorporated within the building regulations and not open to local variation, other than in particular, costed cases.

6.22. The fire regulations, like other building regulations, are rules-based and standardised. Their impact on development shows that rules-based planning does not of itself facilitate development.[132] The content of the rules, like the content of conventional discretionary planning, is the crucial factor.

123 Civic Voice, Response to Open Consultation. Design and Placemaking Planning Practice Guidance, March 2026.

124 MHCLG, Draft for consultation. Design and Placemaking Planning Practice Guidance. 2026, paras. 192-97.

125 IHBC, 22-09-2026.

126 MHCLG, Draft for consultation. Design and Placemaking Planning Practice Guidance. 2026, Paragraph 11, Page 7.

127 MHCLG- National Planning Policy Framework, August 2026, paragraph 17b.

128 Carmona. 2021, page 35.

129 Civic Voice, Response to Open Consultation. Design and Placemaking Planning Practice Guidance, March 2026, paras. 11.2 & 11.3.

130 MHCLG. National Planning Policy Framework, August 2026, policy PM13.1b. MHCLG. Proposed reforms to the National Planning Policy Framework and other changes to the planning system, December 2025, page 24

131 Cooper & Oxley, 2026, p.27: Lange, M. February 2026: Burn-Murdoch, 18 July 2026.

132 Cooper & Oxley, 2026, p.1, p.8: Burn-Murdoch, 18 July 2026

6.23. The most commonly cited UK example of development being facilitated by so-called rule-based planning comes from a design guide introduced in the London Borough of Croydon between 2018 and 2022, but eventually withdrawn after local opposition. It is arguable whether the design guide amounted to rules-based planning, however. The reference in the title to 'guide' was significant as rule-based planning generally involves a 'code'[133] and planning permission was still required. The guide promoted the intensification of selected suburbs in Croydon, with multiple examples of acceptable layouts. This in turn enabled the replacement of large single-family houses with small apartment blocks, so leading to a highly localised building boom. Writing in the 'Financial Times', Burn-Murdoch has called the Croydon experiment 'a cautionary tale' as the policy was not based on adequate public consultation and was controversial from the outset. The example is an innovation within the conventional discretionary UK planning system, rather than a move towards a wider rules-based approach.

Adaptability and floorspace

6.24. Adaptability is another criterion that, like 'beauty', does not figure in the draft national placemaking guidance, the PPPG, perhaps again because this is a portmanteau term that covers a variety of situations. Adaptability is easier to define in the negative as 'anti-adaptive' urban forms.[134] Anti-adaptive urban forms can be caused by small tight-fit housing that fails to cope with the diversity of home activities, including home working. The amount of internal floorspace is a key determinant of adaptability to different uses, especially in apartments as these can seldom be expanded outwards after completion. Anti-adaptive urban forms can also cover concentrations of so-called 'student accommodation' in areas without the social infrastructure for family life (schools, health surgeries and green space). A site visit to a recently completed student housing scheme revealed small rooms, very tightly planned with bathrooms and cooking facilities crammed in a way that could not easily be converted into family housing of a type that was greatly needed in the locality.

6.25. Draft national placemaking guidance, the PPPG, has a section called 'liveability' that includes the following clauses:[135]

- 'Neighbourhoods should offer a mix of house types and tenures to meet local needs and market demand, ensuring inclusivity for all stages of life.'
- 'homes that are integrated with other facilities and designed to be tenure neutral and socially inclusive.'

6.26. The liveability section therefore covers adaptability to an extent and is able in principle to prevent concentrations of student housing. Adaptability is more than an exercise in design or placemaking, however. It is also about the development process. Local societies should therefore seek a policy declaration, during the plan preparation stage and preferably with identified allocated sites, in favour of a diversity of provision and types of developer, including small developers, community-led development, and self-build schemes alongside conventional commercial and social house building.

6.27. In addition, a design guide cannot deal with a situation where an existing neighbourhood has already become 'anti-adaptive'. That requires investment, probably public investment, in changing the character of the neighbourhood, for example through the insertion of different house types and tenures, as well as investment in social infrastructure. In some cases, demolition or the introduction of new or improved communication links may be necessary. This latter is especially important where a loss of accessible local employment has caused a housing estate to become isolated.

6.28. The design of the home is still a potential constraint on liveability, and therefore adaptability. To ensure the flexible use of the home, local societies should encourage authorities to adopt the 'National Described Space Standards', first endorsed by government in 2015.[136] These latter provide an absolute minimum gross internal area of 37 m2 for a one-bed, one-person dwelling with a shower room (rather than a bathroom). Other minimum floorspace standards are related to the intended number of bedspaces. The minimum ceiling height is 2.3m for at least 75% of the floor area.

6.29. In their present form, the floorspace standards are 'described', rather than 'prescribed'. Local adoption is patchy, with below standard accommodation particularly common in central London and regional centres with concentrations of young people, student housing and houses in multiple occupation.[137] In addition, where the described space standards have been used to justify refusal of planning permission, local planning authorities have sometimes been overruled on appeal.[138]

A tendency for social housing development to fall below the described standard is another deterrent. Requiring the described standard might prevent the provision of social housing.

Homes for ageing and disability

6.30. The adaptability of the housing stock must also involve an assessment of the extent to which it can accommodate elderly and disabled persons in comfort and without inconvenience. People are living longer and the numbers of aged people are increasing. It makes sense therefore to encourage the provision of housing with characteristics that meet the needs of older, as well as younger people and that allows them to live independently for longer, connected to the community.

6.31. The M4 standards of the building regulations define the requirements for new homes if they are to accommodate varying mobility requirements.[139] There are three levels of accessible housing. The least ambitious type that of M4(1) Category 1: Visitable dwellings, is now applied as the minimum standard within the building regulations. The visitable standard promotes easy, safe (but not necessarily step-free) access to the home and the provision of an entry level (for example downstairs) WC, but not the provision of an entry level shower or bath.

6.32. The remaining two standards comprise:

- M4(2) Category 2: Accessible and adaptable dwellings. The Category 2 standard is similar in its dwelling specific requirements to the 'Lifetimes Homes Standard' previously promoted by the Joseph Rowntree Foundation amongst others. The Category 2 standard includes step-free access, entry-level private washing facilities, wider internal corridors, stairs of sufficient width to accommodate a chair lift and other features.
- M4(3) Category 3: Wheelchair user dwellings, with additional provision for wheelchair users.

6.33. In the past, many of the requirements of accessible and adaptable housing were met by the development of bungalows. These still remain popular amongst consumers. Developers seldom build bungalows now because they invariably require more land and land values have increased. In addition, households sometimes convert bungalows into two storey dwellings to gain additional rooms and floorspace. Category 2 and 3 requirements instead specify that stairs are of sufficient width to accommodate chair lifts, whilst also requiring WCs and washing facilities on the ground floor.

6.34. Pressure groups representing disabled and aged persons would argue that the general application of the category 2 standard would be of benefit to all users, resulting in a well-designed, flexible home and that therefore category 2 should be included in the building regulations as a universal minimum. In 2022, the government in power issued a press release indicating the introduction of requirements to ensure an increase in the number of accessible, adaptable and wheelchair standard homes.[140] Even before publication of the 2026 NPPF, development plans were able to specify that a proportion of new homes should conform to either the category 2 or category 3 standards or a combination of these. The 2026 edition of the NPPF is firmer and clearer in respect of category 2. It states that 'no less than 40% of homes on major developments are delivered to M4(2) standards (subject to any appropriate exemptions set out in the development plan).'[141] Additional requirements for category 3 (wheelchair homes) remain discretionary and would require adoption in a Local Plan.

6.35. In the past, as documented by the Royal Town Planning Institute, only 'a very small number of planning authorities in England' had adopted a policy to raise the proportion of category 2 and 3 homes through requirements written into a Local Plan. The same report also noted that developers had previously challenged a local policy target that specifies that 30 per cent of new homes should conform to category 2 and 3 per cent for category 3.[142] The provisions in the 2026 national planning guidance are therefore a major step, even if they do not meet the ambitions of the relevant pressure groups. It remains unclear, however, how developers and local planning authorities will respond to the possibility of making 'appropriate exemptions'.

133 Croydon Council, April 2019.
134 Cozzolino, 2020.
135 MHCLG, Draft for consultation. Design and Placemaking Planning Practice Guidance. 2026, paragraphs 23-24.
136 DCLG, March 2015.
137 Hubbard, 2025.
138 Hubbard, 2023.
139 HM Government, The Building Regulations 2010. Part M.
140 DLHC, 29 July 2022.
141 MHCLG, National Planning Policy Framework. August 2026. Policy HO5.1b.
142 RTPI, November 2022, page 10.

6.36. Upgrading the housing stock to an accessible and adaptable standard is only a specific and technical aspect of creating spaces, towns and cities that are attractive and convenient for aged persons. Providing accessible public buildings and urban spaces is another aspect, covered by other separate technical standards. The subjective dimension of ageing also needs considering- a large policy agenda that includes what older people consider normal in terms of their previous experience, whether they can participate in daily life and in the decisions that affects them and whether a neighbourhood is clean, friendly and safe.[143]

6.37. Meeting the social expectations of older people generally means a recognition of staying put as the preferred option. In the words of a recent scientific review: 'Designing appropriate environments for ageing in place has far-reaching implications for the health and well-being of communities, especially our oldest citizens.'[144]

6.38. Ageing in place means, in turn, that older people may find a way of adapting a home through their own initiative and this should be encouraged. If a house is large enough, multi-generational housing can be a massive benefit to each generation. If a house is not large enough to accommodate a second generation, an extension might be built to provide a home for them and their children if the plot is large enough. Adaptability in housing and place making also requires flexibility in those regulations that cover home extensions. Finally, meeting social expectations means, in terms of urban design and the built environment, that the criteria for making a 'good' place for older people will have many overlaps with general criteria for good design, for example neighbourhoods that are clean, safe and close to green space.

6.39. Under the heading of 'mix', conventional placemaking criteria, including those in the draft PPPG, recognise the case for including homes for older people in new developments. The PPPG also recognises the role of public space in bringing generations together.[145] As recommended in a recent inquiry by housing charities,[146] recognition of the case for intergenerational spaces could be taken further through mixed age communities, including residential and care homes where the young and elderly are brought together within a single facility.

6.40. For example, nurseries may be introduced into retirement or care homes. This is thought to have officially started in 1976, when Shimada Masaharu merged a nursery school and care home in Tokyo with great success.[147] The idea has since spread to many countries and some offer facilities such as restaurants that are open to the local community, benefiting both them and the elderly residents, though designs need to provide options for segregation if needed. In another example, a nursing home in the Netherlands allows university students to live rent-free alongside the elderly residents, as part of a project aimed at warding off the negative effects of ageing. In exchange for small, rent-free apartments, the Humanitas retirement home in Deventer, Netherlands, requires students to spend at least 30 hours per month acting as 'good neighbours' to the elderly residents. The students are allowed to come and go as they please, as long as they follow one rule: Do not be a nuisance to the elderly. A similar programme that began in Barcelona, Spain in the late 1990s has been replicated in more than 20 cities throughout that country.

6.41. Local civic societies are concerned with the built environment and their membership contains many older people. They are therefore in a good position to campaign for better planning for ageing and, as part of this, to campaign for the universal provision of suitable accessible, adaptable and wheelchair housing at the very least to the level stated in the 2026 NPPF. Local civic societies might moreover consider how to pursue their campaigns with other local groups concerned with care and older people.

Houses in Multiple-Occupation (HMOs)

6.42. HMOs are often ignored in local development plans and in national and local design guidance, partly because they are controlled under the Housing Acts as well as the planning system. HMOs involve separate bedrooms for unrelated individuals and households but shared kitchens and living or dining areas and sometimes shared bathrooms. For marketing reasons, HMOs may also be called shared living or co-living housing.

6.43. HMOs provide less expensive accommodation of a type that is not otherwise available and as such play an essential role in local housing markets. In addition, for younger mobile households, HMOs provide short-term accommodation, similar to student housing. Further, in town and city centres, the provision of HMOs may be the only viable way of bringing empty property into use.

6.44. The disadvantage of HMOs is if they are concentrated into specific streets and cause

public complaints- about excessive street and open space car parking, about an excessive number of dustbins and about the poor maintenance and upkeep of external spaces. Local authorities are empowered to impose Article 4 directions to control the number of HMOs in limited areas. Given their role in the housing market, neither local societies nor local authorities should seek to eliminate HMOs, merely to manage their numbers where local environmental problems have become apparent.

6.45. Local societies should seek to influence local authorities to ensure that planning and environmental/ housing staff work together in maintaining acceptable standards of equipment, internal layout and management. Societies should press local authorities to ensure that all new HMOs are designed to minimum space, amenity and layout standards, that these standards are published and enforced and finally that examples of poor management are tackled under the Housing Acts.

Compliance and enforcement

6.46. Planning depends on enforcement as well as plans and design guidance. Owners may proceed without permission. Developers may ignore conditions. Yet the use of conditions may have been the only way that a planning authority could have permitted a development to proceed.

6.47. In governmental reports and likewise in the academic, scientific literature, enforcement has received much less discussion than issues relating to design or planning. At an international level, the professional preference is generally for negotiation in enforcement action, with the result that authorities are likely to resort to a formal process only if persuasion has failed to correct or mitigate the infraction.[148] Practice in England is similar in that enforcement is discretionary and is used when expedient. An owner or other interested party can apply for retrospective permission and the process of negotiation is likely to continue as the application proceeds. Enforcement notices must be accompanied by a statement of the reason to do this and that reason is unlikely to be upheld in either a planning appeal or in the courts in the absence of adverse broader planning or environmental consequences. The breach of planning regulations has to be associated with a degree of harm.[149]

6.48. Enforcement also depends on public cooperation notably in reporting breaches to the local authority. Local societies have a role in this, especially in reporting breaches of listed building consent or other matters affecting heritage. A report of a breach of planning control by a Civic Society is likely to carry more weight than a report from an individual. The society should therefore use its judgement as to when to intervene.

6.49. In housing development, including volume housing development, the enforcement of conditions relating to nature protection has proved especially problematic. Hedgerows and trees are easily damaged or ripped out by building contractors and not easily replaced. A survey, undertaken between June and August 2024 of 42 new housing estates, found that only 53 per cent of the ecological features mentioned in planning conditions were present in reality.[150] In addition, as a result of biodiversity gain requirements, developers were scaling back the amount of ecological features that were being provided on-site.[151]

6.50. Raising expectations for good quality, green design and then failing to meet those expectations is a recipe for distrust and likely to raise objections to further development. The lack of enforcement of ecological conditions, in particular, suggests a systematic failure, probably linked to a lack of Ecologist staff within local government. Local societies should press authorities to employ relevant skilled staff. Working alone or with local green groups, they might also consider undertaking local surveys of ecological compliance and of publishing the results.

143 Buffel et al, 2012: Plouffe & Kalache, 2010: World Health Organization, 2023.

144 Neville et al, 2025.

145 MHCLG, Draft for consultation. Design and Placemaking Planning Practice Guidance. 2026, para. 157, page 50.

146 Beech, 17 March 2026.

147 Payne, 2022.

148 Lai, et al, 2007, p.540.

149 Harris, 2010.

150 Chapman et al, p.22.

151 Ibid., p.49.

7.

EXAMPLES OF GOOD HOUSING AND GOOD PLACEMAKING

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7.1. In the preparation of this report, civic societies were asked to give examples of recently completed schemes that they have welcomed and could support. Many, though not all civic societies make annual or biannual design awards intended to raise public awareness of both good design and of the work of the local society. In this report, the examples are selected to provide lessons for elsewhere and include some schemes that have been commended, but have not been included in any formal awards scheme.

The scope of local design awards

7.2. The scope of local awards schemes commonly goes beyond housing to encompass such matters as public art, the enhancement of public space, shopfronts and ecological impact. In relation to housing and mixed use schemes, local civic societies are generally looking for schemes that fit into the scale of their context, whatever the style. There are indications, for example from Leeds and Bristol that factory-built housing is acceptable so long as it retains a domestic scale.

7.3. Local societies also commend schemes that tackle wider policy aims- schemes that, for example, meet local housing needs, that reduce energy consumption, that use small or awkward brownfield sites or that involve the repair and modernisation of historic buildings. In addition, the awards may attempt to show that well-designed housing is not necessarily built of blocks and bricks with a mock Georgian frontage and false or superfluous chimneys on the roof.

7.4. The survey work of Carmona et al would suggest that volume builders provide few, really good, praiseworthy schemes and that is confirmed by a tendency for the product of volume builders to be ignored by local societies, both in local award schemes and in their statements for this report.[152] Volume housebuilding is important for the economic well-being of a town or city. However, most local societies would not want to praise or encourage more of the resulting estates. One local society commented on how recent development had resulted in 'a great number of houses spread in a seemingly random pattern, with no real sympathy to the character of the town'.

7.5. Volume housebuilders also tend to design schemes to the minimum building regulations and this limits the scope for innovation, especially in relation to ecological, low energy and low carbon design. The dominance of high-rise schemes in London and other major city centres is another concern. The development of high rise may be inevitable but societies would not provide awards for many recently completed high rise housing schemes.

The selected schemes

7.6. The cited schemes have been selected to represent a range of different planning situations and different housing solutions, including high density in central London, a mixture of forms and densities in other towns and cities and a small-scale rural social housing scheme from the Yorkshire Pennines. This latter is not yet built but reveals both the likely form and the complex, time consuming character of developing an 'exception' to an established planning policy. The contrast in form emphasises the impossibility of introducing a single all-England statement of design guidance unless variations in densities, use and local character are incorporated as an integral part of the structure of that guidance.

7.7. The selected examples are set out below.

7.7.1. The scheme at **Bibb Way and Handford Road, Ipswich** comprises the conversion of an empty office block to 78 flats and the new development of a further 31 houses and 41 flats on the site of the carpark and data centre previously associated with the offices. The developer is Handford Homes- the housebuilding arm of Ipswich Borough Council. Most homes are let at affordable rent through the local authority, while some are let at market rent by a subsidiary company. Facilities include cycle storage, refuse/recycling storage, open space, landscaping and ancillary works and infrastructure. The houses are equipped with high levels of insulation, triple glazing, solar panels and air source heat pumps, all designed to reduce energy consumption. In addition, as part of the development improvements, improved public footpath access was provided to a local canal

and improvements were also made to local green spaces, including a recreation area. Bibb Ways and Hanford Road shows for how design and development can lead the way in creating low-carbon, climate-resilient places for the future, that retain existing buildings as well as trees, gardens and green spaces and that, in addition, promote local connectivity and access to local amenities.

Source: Mandy Gaylard, The Ipswich Society Awards 2025.





Bibb Way/ Handford Road
© Mandy Gaylard, The Ipswich Society

7.7.2. **Charles Lodge & Bewick Court, Evesham Town Centre, Evesham** is a retirement scheme comprising 49 one and two bedroom apartments and 7 two bedroom cottages, with the added benefits of a landscaped garden, communal owners' lounge, a lodge manager, and a 24 hour emergency call alarm service. The site is located in a Conservation Area, but had been underused for many years. The developer, Churchill Living, specialises in purpose-built apartments designed specifically to meet the needs of older people, enabling them to enjoy an active, independent and sociable lifestyle. The location is well-suited to that purpose. The apartments in the scheme are self-contained and were sold with a lease containing an age restriction which ensures that only people of 60 years or over, or those over this age with a partner of at least 55, can live in them. The developer has won awards for the high quality of its completed housing. The civic society gave Charles Lodge and Bewick Court a special award, the first for a housing scheme for some time, in recognition of its successful and sympathetic redevelopment of a site near the heart of town.

Source: Gillian Pawson, Vale of Evesham Society.





Charles Lodge & Bewick Court, Evesham © Gillian Pawson

7.7.3. **Gap House, Bell Close, Bristol** comprises nine low carbon one-bedroom, two storey homes built on a disused council-owned garage site and providing social rent homes for single occupants on the housing register. Developed as part of a national innovation programme, the scheme has a striking appearance mostly as a result of the use of red aluminium cladding panels and the layout constraints of an unusually narrow site. The roof pitches are orientated to the south and angled to optimise solar gain to the PV panels. The provision of benches outside each porch area has been designed to foster social interaction between neighbours. For Bristol Civic Society,

'Gap House stood out because of its clarity and simplicity. It demonstrates how underused land can be transformed into high-quality homes through careful design, efficient use of space and a disciplined development approach.

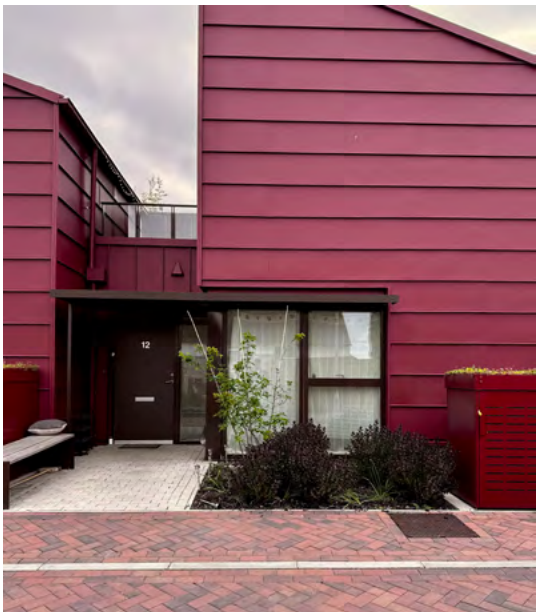
152 Carmona, et al. 2021.

'What impressed the panel most was not simply the quality of the individual homes, but the wider implications of the concept. This is a model with potential application across Bristol, helping to unlock smaller sites that are often overlooked yet collectively could make a meaningful contribution to housing supply.

'Modest in scale but ambitious in intent, Gap House demonstrates how innovation can emerge through practicality as much as through technology.'

Sources: Housing Festival (Bristol) Bell Close, Innovation in Practice, commissioned by Etopia, consulted September 2026 at https://static1.squarespace.com/static/64bfa6aaaf61fe5ba8d681bf/t/691de71a4671346b710e7ea7/1763567386693/Innovation+in+Practice_Bell+Close_FINAL_3.0.pdf
Bristol Civic Society, 'Design Awards 2026', consulted September 2026 at https://www.bristolcivicsociety.org.uk/design-awards-2026/





Gap House, Bell Close, Bristol
© Tony Berongoy, Bristol Civic Society

7.7.4. The **Leeds Climate Innovation District** is located on the east side of Leeds City Centre. Built on former industrial land along both banks of the Aire and Calder Navigation (a canalised river) with the two banks joined by a pedestrian bridge. This emerging neighbourhood comprises a mix of apartments and housing and co-working and small business spaces, with the promise in future of a primary school and a care home (potentially co-located). In the vicinity, industry continues in the form of a specialist oil refinery, a glass-making factory and other small and medium sized units. Most of the homes are available to buy, though some are managed by Leeds Community Homes on an affordable basis. The company behind the development, CITU, manufactures the dwellings in a factory. They are then winched into place and finished in situ. CITU is therefore a combined housing developer, manufacturer and builder. What makes the Climate Innovation District different is the environmental credentials of the properties – which are near to Passivhaus standards and require very little heating. In addition, a people-first approach is adopted for the layout: there are virtually no cars visible on site (though there is some underground and undercroft parking) and communal gardens and planting provide an oasis in what could otherwise seem like a harsh environment. Pop up businesses including a bar, and grocers support the local community. Leeds City Centre is synonymous with high rise apartment living. This scheme bucks the trend by providing low rise, family-focused housing and mid-rise apartments in a city centre location.

Sources: Martin Hamilton, Leeds Civic Trust and CITU, this latter consulted September 2026 at https://citu.co.uk/inside-leeds-new-sustainable-housing-and-net-zero-neighbourhoods/



Leeds Innovation District
© Martin Hamilton, Leeds Civic Trust

7.7.5. **Macfarlane Place, Hammersmith** (Peabody Housing Association) comprises 142 affordable homes in a pair of seven floor buildings, with units for shops or offices on the ground floor. Built on the site of a former car park, the scheme won the Hammersmith Society Environment Award for 2025 and also received a favourable review in the RIBA journal (17 April 2025). The Hammersmith Society states that the scheme 'stands apart in design quality, urban planning and overall contribution to the quality standards of the borough'. The brickwork on the façades wins particular praise for its texture, detailing and patterning, as does the provision of heat regulating shutters that reduce overheating, eliminate the need for air conditioning and protect the occupants from the noise of busy streets and a nearby railway line. In terms of housing, Macfarlane Place is, in the view of the society, a mid-rise development of exactly the sort that is often discussed but rarely developed and that might actually address the housing problem with places people would want to live in. The actual housing density achieved is probably not far off that achieved in very tall residential towers. In terms of urban design, the development 'brings character and presence' to an otherwise mostly undistinguished stretch of street.

Source: Hammersmith Society, Awards Narrative 2025. Consulted September 2026 at https://www.hammersmithsociety.org.uk/wp-content/uploads/2026/02/Awards-Narrative-2025.pdf



Macfarlane Place, Peabody Housing Association
© Hammersmith Society

7.7.6. The **'Chippings' site, Scholes Village, Holmfirth, West Yorkshire** will comprise 10 terraced houses, designed to Passivhaus standards, conforming to the local vernacular and intended to be occupied by local people with verified housing needs. The site is a former old stone quarry most recently used for storing road making and repairs materials and owned by the Holme Valley Land Charity on behalf of the parish council. The developer, Ecoholmes Community Land Trust, started consultations in 2020 and then agreed to work with the Land Charity. At about the same time, an agreement was made with Connect Housing as a development partner that would finance, build and operate the affordable housing for rent under a long term (999 year) lease agreement. In August 2021, preapplication advice was sought from the planning authority, Kirklees District. In February 2022, the pre-application advice was received, confirming the scheme to be suitable, subject to confirmation of 'robustly evidenced local need'. In July 2022, a planning application was made, and after modifications and local consultations, was re-published in January 2023. The main fear amongst both planners and some local residents was that the 'exception' would undermine Green Belt policy and lead the way to permission for much larger commercial housing schemes. A Neighbourhood Development Plan had been adopted in 2021. While this expressed a need for more housing and supported community-led provision, it did not identify the Chippings site for new development. The application was approved in principle in March 2023 with conditions. However, full permission was not granted until October 2024 owing to delays in the drafting of a Section 106 agreement sufficient to define local needs. Various other pre-commencement conditions were finally cleared in September 2026, allowing the works to commence.

Sources: Ecoholmes Community Development Trust: Holme Valley Neighbourhood Development Plan .



The 'Chippings, Scholes Village, Holmfirth, West Yorkshire
© Richard Townend, GWP Architects

ACKNOWLEDGMENTS AND DISCLAIMER

8.1. The initial draft report was prepared by an Expert Panel within Civic Voice, with representatives from civic societies based in Coventry, Ealing, Epsom, Holmfirth, Kings Lynn, Portsmouth, Retford, The Vale of Evesham, Wakefield and Wimbledon, as well as the Director of Development for a Social Housing Agency. It has also been subject to discussions by the Board of Civic Voice comprising representatives from additional local societies, namely Leeds, Southgate (London), St. Albans, Spalding, Wakefield and Wetherby.

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8.4. The cartoons are the work of Tony Michael of the Wimbledon Society.

8.5. The authors of the photographs are named at the foot of each photograph. The front cover illustration is the work of Richard Townend and GWP Architects.

8.6. The lead authors of the report are Barry Goodchild, Tim Brown and Geoffrey Payne, who must take responsibility for the contents.

8.7. Local civic societies are independent entities. They are not bound by the contents of this report. Local variety means, in any case, that each development and every planning application has unique aspects. In addition, the guidance should not be considered an authoritative legal account. Local societies should consider the contents whilst also considering whether they need further, detailed policy and legal advice.

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