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10<sup>th</sup> March 2026

Response submitted by email only to: [designquality@communities.gov.uk](mailto:designquality@communities.gov.uk)

Dear Sir / Madam,

**Re: Design & Placemaking Planning Practice Guidance**

Introduction

The Land, Planning and Development Federation (LPDF) welcomes the opportunity to respond to the consultation on the proposed Design and Placemaking Planning Practice Guidance (PPG). This is a positive step forward in terms of usability and coherence, and we support the ambition to help Local Planning Authorities (LPAs) make decisions more efficiently while improving design quality.

The LPDF represents land promoters, developers, and planning professionals engaged in delivering sustainable development across a range of scales and geographies. Our members are committed to achieving high-quality design outcomes and recognise the important role that clear and proportionate guidance plays in improving placemaking and public confidence in the planning system.

We are broadly supportive of the objectives of the guidance. In particular, we support:

- Strengthening design quality across all development;
- Embedding placemaking principles at plan-making and decision-making stages;
- Promoting early engagement and clarity of expectations; and
- Supporting well-designed, sustainable communities.

Overall, the LPDF believe that the consolidation of the previous documents into a single PPG is a big step forward. It is clearer to navigate, and it helpfully positions itself as supporting LPAs to speed up decision-making while maintaining focus on design quality. That said, there are a few areas where greater clarity would make it more effective in practice.

In addition, we emphasise the importance of ensuring that the guidance is proportionate, non-duplicative, viable in practice, and deliverable, particularly for SME builders and small and medium sized sites. Design policy must enhance quality without creating additional layers of complexity or cost that risk undermining housing delivery.



## About the LPDF

The LPDF seeks to represent the UK’s leading land promoters, home builders and commercial developers. LPDF members support the housebuilding and commercial development sectors by promoting sites through the planning system, providing “shovel ready” land with a planning permission which can facilitate the delivery of infrastructure and serviced land parcels.

The LPDF seeks to actively engage with government on planning, housing and commercial development policy and to educate the wider public on the social, environmental and economic benefits of development through an evidenced based approach.

## Comments on the draft PPG

### Part1: Seven features of well-designed places

The LPDF welcomes the use of a structured framework for assessing design quality based on the seven features of liveability, climate, nature, movement, built form, public space and identity. A clear and consolidated framework has the potential to improve consistency in assessment, provide greater clarity for applicants and decision-makers, and reduce subjectivity where properly aligned with adopted policy. Framing design quality through a set of recognisable themes may also help embed placemaking principles more firmly within both plan-making and decision-taking.

We support the draft’s emphasis on identity and distinctiveness, but we recommend more practical guidance on how LPAs should distil local character into usable parameters that shape layout, landscape structure and public realm, not just architectural style. This should include worked examples of both good and poor practice which would improve clarity, reduce subjective disagreement, and help applicants respond more consistently to local priorities.

The LPDF emphasises that the seven features must operate as a structured lens for assessment rather than as seven additional policy tests or cumulative layers of obligation. In practice, there is a risk that each feature could be interpreted as requiring separate and detailed justification, leading to incremental increases in documentation and evidential requirements. Without clear direction in the PPG, comprehensive placemaking frameworks could become an expectation across all site typologies, regardless of scale or context.

The seven features need to be applied proportionately, having regard to site size, complexity and location. For large-scale strategic allocations, comprehensive consideration across all seven features may well be appropriate and expected. However, for small and medium-sized sites, good design and placemaking will typically be demonstrated through effective integration with the existing context, sound layout principles, policy-compliant residential standards and high-quality built form. These sites should not be expected to undertake strategic scale masterplanning exercises or infrastructure planning that would be more appropriately associated with major urban extensions.

The LPDF is also concerned about the cumulative impact of applying the seven features alongside existing regulatory and policy requirements. Many of the objectives captured by the framework are already embedded within adopted local plan policies, national standards, Building Regulations, biodiversity net gain legislation and environmental performance requirements. This is especially relevant in the context of SME developers and small and medium-sized schemes, which typically have limited capacity to absorb additional upfront cost and are more sensitive to delay.

Small and medium-sized sites are critical to achieving the Government’s ambition of delivering 1.5 million homes. They often come forward more quickly than large strategic allocations, support SME builders and contribute to greater diversity and competition within the market. If the seven features are applied in a way that necessitates extensive



masterplanning, significant public realm provision, repeated design review or disproportionate levels of technical documentation, there is a real risk that such sites will become less deliverable. The PPG should therefore make clear that expectations must be scaled appropriately and that viability and deliverability remain material considerations in applying the framework.

### Part 2: Design quality in the planning process

The LPDF supports the objective of embedding design quality more effectively throughout the planning process, including at plan-making, pre-application and decision-taking stages. Securing good design is most successful where expectations are clear, proportionate and established early. A well-functioning system should provide certainty to applicants while enabling local authorities to assess proposals against transparent and adopted benchmarks.

We welcome the focus on a clearly expressed concept and design story rooted in a sound understanding of context, including landscape, ecology, movement, microclimate and water. The LPDF recommend providing clearer examples or templates of what a “good” design story looks like in practice, including how landscape-led and nature-led narratives can be embedded early and evolve over time to create distinctiveness (for example, through the layering of nature, history, culture and everyday use).

If speeding up decisions is a core aim, the Draft PPG should place even greater weight on early engagement and the forging of good working relationships to build trust. In particular, it would be helpful to set out clearer expectations for how applicants and LPAs can use a structured early process, such as a workshop, charrette, or well-scoped pre-app, to agree common ground, aspirations and site/LPA-specific challenges at the outset. This kind of outcome-led early alignment (around quality, nature, movement, play and identity) can reduce late-stage redesign and help LPAs feel better supported and more confident in making timely decisions.

In the LPDF’s view, the most effective mechanism for achieving high-quality design outcomes is through a genuinely plan-led approach. Up-to-date local plans and clearly articulated design policies provide the strongest foundation for consistent decision-making. Where expectations are established through the development plan process, informed by viability assessment and subject to consultation and examination, applicants can respond with confidence and schemes can progress efficiently. The PPG should reinforce that detailed design expectations are best embedded at the plan-making stage.

As outlined above pre-application engagement plays a valuable role in improving design outcomes, particularly for complex or strategic sites. Early dialogue between applicants, local planning authorities and communities can help identify key issues and reduce later delay. However, such engagement must remain proportionate and clearly scoped. For smaller and medium-sized schemes in particular, pre-application processes should not introduce significant upfront costs that risk deterring site promotion. The guidance should acknowledge that the scale and intensity of engagement should reflect the size, complexity and potential impact of the proposal.

In terms of decision-making, the LPDF supports greater clarity in how design quality is assessed and justified. Clear reference to adopted policies and design codes can reduce subjectivity and support defensible decisions. However, it is important that refusal on design grounds is firmly rooted in adopted policy and evidence, rather than broad or evolving interpretations of design quality. Certainty in decision-making is essential to maintaining investor confidence and sustaining housing supply.

Ultimately, embedding design quality within the planning process should enhance clarity, efficiency and predictability. If framed appropriately, the guidance can support better outcomes without undermining viability or slowing delivery.



However, this will depend on ensuring that processes remain proportionate, plan-led and grounded in adopted policy, with explicit recognition of the role of SME builders and smaller sites in meeting the Government’s ambition of delivering 1.5 million homes.

### Part 3: Setting effective design codes.

The LPDF supports the principle of well-prepared and locally specific design codes. When developed through a robust and plan-led process, design codes can provide clarity, reduce subjectivity in decision-making and give applicants greater certainty regarding expectations. Properly framed, they have the potential to streamline applications and improve confidence among communities and developers alike.

However, the effectiveness of design codes will depend fundamentally on how they are prepared, tested and applied in practice. The LPDF strongly emphasises that design codes must be embedded within the statutory plan-making process wherever possible. Codes prepared alongside or as part of local plans, subject to consultation, viability assessment and independent examination, are more likely to strike an appropriate balance between quality, deliverability and local character. By contrast, supplementary or informal design codes introduced outside a clear policy framework risk creating uncertainty, duplication and additional burden.

Viability must be a central consideration in the preparation of design codes. Prescriptive coding requirements can have significant cost implications, affecting materials, typologies, density assumptions, infrastructure provision and site capacity. Without appropriate viability testing, there is a risk that well-intentioned coding could render sites undeliverable or reduce the ability to provide affordable housing and other policy requirements.

The LPDF also emphasises the importance of flexibility within design codes. While clarity is valuable, overly rigid or excessively detailed prescriptions can constrain innovation, limit the use of modern methods of construction and restrict the ability to optimise land use. In the context of the Government’s ambition to deliver 1.5 million homes, it is essential that coding supports efficient use of land in sustainable locations rather than inadvertently constraining density or site yield. Codes should establish clear parameters and objectives while allowing appropriate scope for design evolution and contextual response.

A further consideration is the differentiation between site typologies. Strategic urban extensions or large allocations may warrant comprehensive coding frameworks that address movement networks, green infrastructure, built form parameters and public realm in significant detail. However, small and medium-sized sites require a more proportionate approach. The LPDF note that the draft PPG states that a Borough or District wide design code should provide general guidance on in fill and small sites. A good example of how this can be achieved, that an LPDF member has highlighted, is the now adopted Rushcliffe Design Code (RDC). This takes the form of a more traditional Design Guide, but overlaid with a Coding element and this approach seems to work well. It is important to note that the RDC identifies several sites where an individual code is required. These are strategic sized sites and so this is a fair and balanced approach. The LPDF highlight the RDC as best practice and believe that this is the type of approach should be followed elsewhere. The LPDF recommend that there should be a threshold below which the individual site design codes would not be required (for example 200 units). If individual design codes are required for small and medium sized sites, these could cause viability issues, delays in the planning process and further disincentives to SME developers. If it is strongly felt the PPG should maintain the provisions for some form design coding being required for small and medium sized sites, the LPDF recommends that suitable wording is included that such Codes are only required in the absence of a District or Borough-wide Design Code, and only where there is a strong justification to do so (i.e. sensitive site adjacent to a National Park, National Landscape, etc) and that they are proportionate to the size and complexity of the development.



The LPDF is also concerned that design codes should not duplicate or conflict with national standards, Building Regulations or other regulatory requirements. Clear alignment is essential to avoid overlapping compliance burdens. Codes should complement the broader planning and regulatory framework rather than add additional technical layers.

Finally, it is important that design codes function as a mechanism for acceleration rather than delay. Where proposals demonstrably comply with an adopted and viability-tested design code, this should provide a strong presumption in favour of approval in design terms. Certainty and efficiency should be explicit objectives of the coding process. If compliance with a code still results in extended negotiation or subjective reinterpretation, the benefits of coding will be undermined.

The LPDF welcomes the inclusion of the diagram on page 120 illustrating the method for calculating net developable area. We support the approach that excludes the strategic road network from this calculation. For clarity and consistency, we recommend that the Draft PPG includes a definition of what constitutes 'strategic road network'. The LPDF proposes the following wording:

“Strategic road network is defined as a principal road or street which passes through or along the boundary of the site and typically serves the wider development or community. Typically, the strategic road network does not provide direct frontage access to dwellings, is designed to accommodate bus routes, and incorporates enhanced pedestrian and cycle infrastructure that is wider than that provided on minor internal roads and streets within a development.”

It is important that any definitions used within the PPG (for example for net developable area and strategic road network) align with those used in the NPPF. Consistency between the guidance and the NPPF is of fundamental importance.

### Conclusions

The LPDF supports the Government’s ambition to strengthen design quality and embed placemaking more consistently within the planning system. The proposed PPG provides a useful opportunity to improve clarity, promote better outcomes and reduce subjectivity in decision-making where expectations are clearly defined and proportionately applied.

Overall, the LPDF believe that the consolidation of the previous documents into a single PPG is a big step forward. It is clearer to navigate, and it helpfully positions itself as supporting LPAs to speed up decision-making while maintaining focus on design quality. That said, there are a few areas where greater clarity would make it more effective in practice.

We believe these clarifications would make the consolidated Draft PPG even more effective in practice, supporting both improved quality and more efficient decision-making. As set out in our comments above to strengthen the draft’s effectiveness in practice and to further support consistent, timely decision-making, we recommend additional clarity and emphasis in the following areas:

- Clearer national baselines to create a level playing field;
- Translating local character into distinctive outcomes (with practical examples);
- Reinforce the “concept + design story” as the core thread from the outset; and
- Lean further into early engagement and a constructive pre-application process.

