

Levelling-up and Regeneration Bill: Reforms to National Planning Policy Consultation

Propertymark response

February 2023

Background

1. Propertymark is the UK's leading professional body of property agents, with over 17,000 members. We are member-led with a Board which is made up of practicing agents and we work closely with our members to set professional standards through regulation, accredited and recognised qualifications, an industry leading training programme and mandatory Continuing Professional Development.

Overview

2. The Department for Levelling Up, Housing and Communities (DLUHC) is seeking views on proposed changes to the National Planning Policy Framework. The Framework sets out the government's planning policies in England and how local authorities are expected to apply them. First published in 2012, was revised in 2018 and updated in February 2019. This latest revision is designed to ensure that national planning policies support levelling up in England. The consultation was announced on 22 December 2022 and run until 2 March 2023. The government plans to respond to the consultation by spring 2023, publishing the new National Planning Policy Framework as part of this.

Summary

3. Propertymark welcomes the opportunity to respond to the Department for Levelling Up, Housing and Communities' consultation on reforms to the National Planning Policy Framework. In 2021, it was estimated that over 1.1 million homes with planning permission were waiting to be built¹. We are therefore pleased to see that action is being taken to reform the planning system to aim to tackle problems of slow delivery and to ensure that more of the right homes are built in the right areas. However, we remain concerned that the reforms provide too much room for local authorities to undercut their housing targets, with little reassurance that local authorities will deliver the right number of new homes across all tenures, which includes homes for rent and buy as well as social and private housing. We therefore call for a planning system that maximises delivery while maintaining proposals to meet community need.

Questions

Question 1: Do you agree that local planning authorities should not have to continually demonstrate a deliverable 5-year housing land supply (5YHLS) as long as the housing requirement set out in its strategic policies is less than 5 years old?

¹ [Over 1.1 million homes with planning permission waiting to be built - new LGA analysis | Local Government Association](#)

4. Propertymark does not agree to the changes suggested to the National Planning Policy Framework regarding the need to continually demonstrate a deliverable five-year housing land supply. Maintaining the previous version of the National Planning Policy Framework allows for a regular review of housing supply, which is necessary in order to deliver the number of homes communities need. Our concern is that if this rule is removed, it may allow local authorities to deliver an insufficient supply of land for housing if they are not required to demonstrate they have a deliverable five-year supply until their local plans are five years old.

Question 2: Do you agree that buffers should not be required as part of 5YHLS calculations (this includes the 20% buffer as applied by the Housing Delivery Test)?

5. Propertymark does not agree that buffers should not be required as part of 5YHLS calculations, due to the extent of the housing shortage in England. The buffer provides an opportunity for local authorities to address historic undersupply. While we understand that not all local authorities will require buffers at 20%, we argue for the continued existence of buffers unless it can be shown that there is a substantial oversupply of housing in particular areas.

Question 3: Should an oversupply of homes early in a plan period be taken into consideration when calculating a 5YHLS later on or is there an alternative approach that is preferable?

6. We do not believe that the oversupply of homes early in a plan should have any impact on 5YHLS calculations. We encourage flexible 5YHLS that are based on the evidence of current demand for homes, rather than previous oversupply. This will ensure that oversupply in the short-term does not lead to an undersupply of homes in the long-term, in cases where it can be demonstrated that the initial oversupply has not led to a reduction in housing demand. This will ensure flexibility for local authorities when responding to an initial supply of homes.

Question 4: What should any planning guidance dealing with oversupply and undersupply say?

7. Guidance should focus on ensuring that housing demand is met and an emphasis on evidence of the oversupply and undersupply of homes within local communities. We discourage inflexible rules that force local authorities to react to an over or undersupply of land, especially during the current environment when since the end goal should always be to ensure that community demand is met. Oversupply and undersupply should also take into consideration the current demand and supply of housing tenure to ensure that there is a sufficient supply of different types of housing.

Question 5: Do you have any views about the potential changes to paragraph 14 of the existing Framework and increasing the protection given to neighbourhood plans?

8. Yes, we have two observations relating to the potential changes to the Framework for increasing protection given to neighbourhood plans. Firstly, if this was enacted, we would like to see a more clearly definition for what is considered an 'adverse impact' under paragraph 11d ii. This remains subjective to the local authority, at a time when the undersupply of homes is causing considerable damage to communities. Secondly, we would also urge the Department to consider altering 14b

to read *'the neighbourhood plan contains policies and allocations to meet its identified housing requirement, and can be reasonably assessed to have or be likely to reach its identified housing requirement'* The proposed changes mean that the existence of policies and allocations, not the delivery of homes, are sufficient to reject developments. Including the need to ensure the local authority is delivering on its local plan can help ensure housing applications are less likely to be rejected if there is an undersupply of homes within a given area. As the paragraph stands, it provides the ability for local authorities to deny applications for the provision of housing at a time when there is a significant undersupply of new homes within their community.

Question 6: Do you agree that the opening chapters of the Framework should be revised to be clearer about the importance of planning for the homes and other development our communities need?

9. We have no issues with the changes made to the opening chapters of the Framework.

Question 7: What are your views on the implications these changes may have on plan-making and housing supply?

10. Propertymark is largely concerned with the historic and ongoing housing supply issues that England has struggled with for decades. In 2020, it was estimated that over 1.6million households were in need of social housing² and we have seen demand for rental properties continue to rise with a 57% increase in demand since 2018³. Latest figures for the total number of houses built every year continue to be significantly under the Government's targets of 300,000⁴.

11. Considering the extent of the issue, there are some positive changes proposed to the national planning policy which we will go into detail as per each section. However, our largest concern is that the changes may allow for several ways in which local authorities can under-supply new homes or set their housing targets below local housing needs assessments and the Housing Delivery Test. While some of these instances, such as to preserve the local character of an area, are not without merit, these proposals potentially provide exceptions for local authorities to under-supply homes in their communities. This has the potential to undermine the UK Government's Levelling Up agenda. Given the scale of the housing shortage across all tenures, the primary objective of the changes to national planning policy must be to maximise the number of new homes built.

Question 8: Do you agree that policy and guidance should be clearer on what may constitute an exceptional circumstance for the use of an alternative approach for assessing local housing needs? Are there other issues we should consider alongside those set out above?

12. We agree that guidance should be clear on what constitutes exceptional circumstances in order to ensure that alternative methods are not used by local authorities to circumvent their obligations to meet sufficient housing needs. Additional issues could include:

² [National Housing Federation - People in housing need 2020](#)

³ [Annual Housing Review of 2022 and Outlook for 2023 | Propertymark](#)

⁴ [Housing supply: indicators of new supply, England: April to June 2022 - GOV.UK \(www.gov.uk\)](#)

- Proportion of homes that are short-term lets within tourist hotspots. Additional supply can be used to ensure there is sufficient housing for long-term residents within these areas and to encourage long-term growth.
- The percentage of homes that are affordable in comparison to the average income of a given region to ensure that sufficient properties are available for homeowners.
- Areas that require additional investment to meet England's levelling up objectives. In order to promote levelling up across England, certain areas may require additional homes to be built as a way to encourage people to move into areas of high investment.
- Price of rental properties and the ratio between new tenants signing up to agents against the number of properties available. This can provide excellent insight into the demand for rental properties.

13. We would also urge the Department to consider historic undersupply and other metrics such as local authority housing waiting lists to be included within the standard method to provide a greater understanding of housing need within communities. This would strengthen the standard method so that it provides a more accurate assessment of housing need.

Question 9: Do you agree that national policy should make clear that Green Belt does not need to be reviewed or altered when making plans, that building at densities significantly out of character with an existing area may be considered in assessing whether housing need can be met, and that past over-supply may be taken into account?

14. We agree that it should be made clear that Green Belt does not need to be reviewed or altered when making plans in the vast majority of circumstances. However, we would argue that, in order for the UK Government to meet its targets of 300,000 new homes a year and for local authorities to meet their local plans, there may be instances where altering Green Belt is necessary. There should be guidance that lists clear instances where Green Belt should be altered, for example where it can be shown that housing targets cannot be met without altering Green Belt. However, it should be made clear that this must be a last resort.

15. We do not believe that being significantly out of character alone should prevent the delivery of housing. While we should not encourage developments that are significantly out of character with the existing area, we urge the Department to consider the scale of the housing need when issuing this guidance. Higher density housing should still be considered in cases of last resort or when local authorities risk falling significantly behind their housing targets.

16. Past over-supply should only be taken into account in instances when demand for properties has decreased as a result of over-supply. Our concern is that local authorities who over-supply a few years into their plan may undersupply for subsequent years. This would undermine efforts to maximise the number of new homes built.

Question 10: Do you have views on what evidence local planning authorities should be expected to provide when making the case that need could only be met by building at densities significantly out of character with the existing area?

17. Local authorities should consider the scale of current undersupply of new homes at set levels. For example, if a local authority is projected to only meet 50% of estimated housing need, then they would have a much better case than if they were projected to meet 90% of estimated housing need. Additional evidence could include consultations to residents, the feasibility of alternative solutions and the number of affordable properties that could be built.

Question 11: Do you agree with removing the explicit requirement for plans to be ‘justified’, on the basis of delivering a more proportionate approach to examination?

18. We do not agree with removing the explicit requirement for plans to be ‘justified’. At this current point in time, when housing supply is at critical levels, the proposed changes for local authorities to propose a plan with a housing requirement that is below their local housing need figure is counterproductive. If local authorities are able to establish a housing requirement below their housing need, without the need to justify their approach, this could lead to a far fewer number of homes being built than the Government’s levelling up plans require, which only prolong England’s housing shortage.

Question 12: Do you agree with our proposal to not apply revised tests of soundness to plans at more advanced stages of preparation? If no, which if any, plans should the revised tests apply to?

19. We do not agree with the revised tests of soundness. Therefore, we do not believe that the revised tests of soundness should apply to any plans.

Question 13: Do you agree that we should make a change to the Framework on the application of the urban uplift?

20. Propertymark agrees with the UK Government’s commitment to maintain the uplift of 35% for the 20 largest towns and cities. This ensures new homes are built in areas of high demand and where required community amenities are available.

Question 14: What, if any, additional policy or guidance could the department provide which could help support authorities plan for more homes in urban areas where the uplift applies?

21. Legislation should be introduced that provides local authorities with more powers to take action against the ownership of empty property of private individuals or organisations, especially within areas of high demand. Additionally, we would like to see greater powers and extensive guidance introduced to local authorities when planning permission has been granted for new homes to be built but the land remains undeveloped. Given the scale of the housing shortage in England, we recommend that action should be taken.

Question 15: How, if at all, should neighbouring authorities consider the urban uplift applying, where part of those neighbouring authorities also functions as part of the wider economic, transport or housing market for the core town/city?

22. We support any policy or guidance that would allow for greater cooperation between neighbouring authorities. Any unnecessary red tape that prevents new homes from being built where two neighbouring authorities have jurisdiction should be limited in order to maximise the number of homes built within these areas.

Question 16: Do you agree with the proposed 4-year rolling land supply requirement for emerging plans, where work is needed to revise the plan to take account of revised national policy on addressing constraints and reflecting any past over-supply? If no, what approach should be taken, if any?

23. As stated earlier, we do not support the proposed changes for local authorities to demonstrate a five-year supply of land for housing. We would encourage that local plans adopt the rolling five-year supply of land for housing as a necessary element to evidence that they can meet their local housing targets.

Question 17: Do you consider that the additional guidance on constraints should apply to plans continuing to be prepared under the transitional arrangements set out in the existing Framework paragraph 220?

24. We agree that any guidance on constraints should apply to plans continuing to be prepared. While ideally changes to the Planning Policy should have been introduced before new local plans were required to be written, having guidance impact plans that are being prepared will prevent plans from having to be redrawn once the new National Planning Policy is introduced.

Question 18: Do you support adding an additional permissions-based test that will 'switch off' the application of the presumption in favour of sustainable development where an authority can demonstrate sufficient permissions to meet its housing requirement?

25. We support the proposals for a switch off, in the instances where it can be shown that planning permission has been received to meet a community's housing needs but a developer has been responsible for underdelivering new homes. We are however concerned that this 'switch off' could lead to undesirable consequences where a local authority may choose a developer who may underdeliver homes in order to take advantage of the switch off. We would therefore encourage action to be taken against the developer in instances where their behaviour has led to an undersupply of housing in order to incentivise local authorities to work with developers who have a strong track record of housing delivery.

Question 19: Do you consider that the 115% 'switch-off' figure (required to turn off the presumption in favour of sustainable development Housing Delivery Test consequence) is appropriate?

26. We consider this to be a sufficient figure to discourage under delivery of homes.

Question 20: Do you have views on a robust method for counting deliverable homes permissioned for these purposes?

27. We would encourage a local authority to hire an independent sufficiently qualified quantity surveyor in order to assess if the target for delivering homes is achievable in the given timeframe.

Question 21: What are your views on the right approach to applying Housing Delivery Test consequences pending the 2022 results?

28. We believe that the Housing Delivery Test consequences should follow from the publication of the 2022 Test. That way, any additional findings can be used to influence and justify any changes to the 2023 Housing Delivery Test.

Question 22: Do you agree that the government should revise national planning policy to attach more weight to Social Rent in planning policies and decisions? If yes, do you have any specific suggestions on the best mechanisms for doing this?

29. While we represent private property agents, it is clear to us that the under-delivery of homes within the social renting sector has forced individuals and families who would be better served through social housing into the private rented sector. We therefore agree that the UK Government should attach more weight to Social Rent in planning policies and decisions. We would recommend that local authorities undertake a review of the housing need of their communities and set social rent targets based on the average income weighted against the average rent of private rented accommodation.

Question 23: Do you agree that we should amend existing paragraph 62 of the Framework to support the supply of specialist older people's housing?

30. We agree that the UK Government should amend existing paragraph 62 of the Framework to support the supply of specialist older people's housing. This will encourage right-sizing for elderly people who will be able to move into more suitable homes. At the same time, as more larger properties are vacated by more elderly people, more families will be able to move into homes more suitable for them.

Question 24: Do you have views on the effectiveness of the existing small sites policy in the National Planning Policy Framework (set out in paragraph 69 of the existing Framework)?

31. We are aware of the arguments that small sites can increase the number of smaller developers who have struggled financially since the pandemic. However, we cannot attest to the effectiveness of the existing policy. We would support any policy that encourages an increase in smaller developers which leads to an increase in the number of properties built.

Question 25: How, if at all, do you think the policy could be strengthened to encourage greater use of small sites, especially those that will deliver high levels of affordable housing?

32. We are not knowledgeable of the effectiveness of the current policy and therefore cannot accurately provide any ideas that would strengthen it.

Question 26: Should the definition of “affordable housing for rent” in the Framework glossary be amended to make it easier for organisations that are not Registered Providers – in particular, community-led developers and almshouses – to develop new affordable homes?

33. We agree that the definition of “affordable housing for rent” should be expanded to make it easier for additional organisations to deliver new affordable homes. We see any step that would increase the number of homes that are built to be a positive step.

Question 27: Are there any changes that could be made to exception site policy that would make it easier for community groups to bring forward affordable housing?

34. We are not adequately knowledgeable in work relating to exception sites to provide a sufficient response.

Question 28: Is there anything else that you think would help community groups in delivering affordable housing on exception sites?

35. We are not adequately knowledgeable in work relating to exception sites to provide a sufficient response.

Question 29: Is there anything else national planning policy could do to support community-led developments?

36. We would support a policy that specifies that housing targets within local plans must split new homes by tenure, including social and private as well as for rent or for home ownership. This would be based on the needs of the community and further split into how the homes can be developed, including community-led developments. This way, local authorities can assess the types of homes they need and work to support the development of them accordingly. This will prevent an under-supply of specific types of homes and promote a wide range of types of development, including community-led developments.

Question 30: Do you agree in principle that an applicant’s past behaviour should be taken into account into decision making?

37. We fully support that the applicant’s past behaviour should be taken into account. This will enable the public to have confidence in the planning system, we believe that there needs to be sanctions for the small minority of developers who fail to adhere to planning regulations. We propose that the following behaviour be in scope:

- Consistent under-delivery of homes, consistent delays to development project completion time, current projects the developer is undertaking (in consideration of their current capacity and potential delays).
- Works not being carried out in accordance with the plans approved as part of the planning permission development works being carried out without planning permission.
- Unauthorised changes of use and previous breaching of planning controls or other similar legal commitments.

38. Local authorities should have the power to treat breaches on merit to consider the severity and persistence of the offence. The severity and regularity of breaches should be taken into account, but ultimately under the discretion of the local authority. This should be combined with clear guidance for local authorities of what should be considered substantial cause for refusing an application based on an applicant's past behaviour.

Question 31: Of the 2 options above, what would be the most effective mechanism? Are there any alternative mechanisms?

39. We believe that breaches should be considered on merit depending on local circumstances and the severity and persistence of breaches. Accordingly, we believe the most democratic and accountable way to consider this would be to allow members of the local planning authority to determine whether an applicant should have their application withheld as a material planning consideration via a planning hearing. Therefore, we support option one.

Q.32 Do you agree that the 3 build out policy measures that we propose to introduce through policy will help incentivise developers to build out more quickly? Do you have any comments on the design of these policy measures?

40. Propertymark is very supportive of ensuring that developers are incentivised to build quicker. This will help housing supply meet demand more effectively depending on local needs. As such, we are supportive of the proposed UK Government policy to implement incentives to speed up building.
41. In principle we are supportive of the UK Government publishing data on developers of sites over a certain size in cases where they fail to build out according to their commitments. However, planning data is weak, and its use is dependent on the accuracy of the local planning authority. For the public or policy planners to have any confidence in the data, the government must ensure that local planning authorities accurately submit data.
42. Propertymark is supportive of the requirement for developers to explain how they propose to increase the diversity of housing tenures to maximise a development scheme's absorption rate. We are also supportive of slow delivery rate being considered as a possible material planning consideration. However, there are many reasons for possible slow delivery, and each should be treated on merit through the planning system.

Q.33: Do you agree with making changes to emphasise the role of beauty and placemaking in strategic policies and to further encourage well-designed and beautiful development?

43. We agree in principle with the changes to emphasise the role of beauty and placemaking to encourage well-designed development. While we emphasise that current housing shortage, we recognise that the public are far more likely to reject housing that is poorly designed and unappealing. We therefore support the proposal for minimum standards in terms of heights, density and form as well as the widespread use of the National Model Design Code. We are also

interested in the government's proposal for secondary legislation on existing permitted development rights with design or external appearance prior approvals will consider design codes where they are in place locally.

Q.34: Do you agree to the proposed changes to the title of Chapter 12, existing paragraphs 84a and 124c to include the word 'beautiful' when referring to 'well-designed places' to further encourage well-designed and beautiful development?

44. We agree as this will give extra emphasis on the need for development to be appealing to the public.

Q.35: Do you agree greater visual clarity on design requirements set out in planning conditions should be encouraged to support effective enforcement action?

45. We agree this is essential for planning authorities to ensure effective enforcement and consistency across the way that well-designed and beautiful places where the design quality of approved development is not materially diminished after a scheme is permitted. We also recognise that accurate drawings are beneficial to developers and the Department for Levelling Up, Housing and Communities may wish to promote this for mutual benefit between developers and planning authorities. Propertymark believes that accurate drawings and plans keeps all the phases of a project economical and efficient. It avoids all kinds of misunderstandings between the stakeholders ensuring that there is an easier and more seamless transition from one phase of the construction process to the other.

Q.36 Do you agree that a specific reference to mansard roofs in relation to upward extensions in Chapter 11, paragraph 122e of the existing Framework is helpful in encouraging LPAs to consider these as a means of increasing densification/creation of new homes? If no, how else might we achieve this objective?

46. In principle, Propertymark agrees that Mansard roofs could provide additional opportunities to expand the number of homes available within a given area. However, we believe that Mansard roofs should be considered on merit, and that members of the Local Planning Authority should be able to determine if they are in character of a local area. Our understanding is that there are advantages and disadvantages of Mansard roofs, which local authorities should explore through independent architectural advice and consider the long-term implications of building new homes. This should include the potential for upward extension when applicable and appropriate as part of a local authority's commitment to maximising the number of homes available.

Q.37 How do you think national policy on small scale nature interventions could be strengthened? For example, in relation to the use of artificial grass by developers in new development?

47. We believe the UK Government has a role in promoting small scale nature interventions. This could include interventions that support habitats such as sowing wildflowers on green verges to the inclusion of bat and bird boxes. We feel that the National Model Design Code has a role in promoting examples of interventions. However, the appropriateness of their implementation

within development should be considered by local planning authorities. These guidelines should highlight that some interventions such as artificial grass do not have any biodiversity benefit, but again, it should be down to local planning authorities to consider if they should be included and judged on merit.

Q.38 Do you agree that this is the right approach to making sure that the food production value of high value farmland is adequately weighted in the planning process, in addition to current references in the Framework on best and most versatile agricultural land?

48. We agree with this approach.

Q.39: What method and actions could provide a proportionate and effective means of undertaking a carbon impact assessment that would incorporate all measurable carbon demand created from plan-making and planning decisions?

49. We would recommend an assessment and analysis of the Whole Life-Cycle Carbon (WLC) emissions produced from development be considered as part of the planning process. This would highlight carbon emissions resulting from the materials, construction and the use of a building over its entire life, including its demolition and disposal. A WLC assessment provides a true picture of a building's carbon impact on the environment.

Q.40 Do you have any views on how planning policy could support climate change adaptation further, including through the use of nature-based solutions which provide multi-functional benefits?

50. For major development, planning authorities and developers should engage at an early as possible with relevant energy companies and energy industry stakeholders to ascertain the future energy and infrastructure requirements arising from large-scale development proposals such as enterprise parks major regeneration projects, Town Centres, large housing estates or clusters of significant new development.

51. For large developments, such as those outlined above, planning authorities should establish energy plans to establish the most appropriate energy sources, consider opportunities for heat networks especially from public sector buildings, source energy from waste and consider the storage and infrastructure of energy as well as identify opportunities to maximise renewable electricity generation and incorporate demand-side response measures.

52. We also support stakeholders calls to tackle over-heating and water scarcity as part of the planning process. While occupant behaviour is a factor especially for over-heating, policy planners can consider mitigation such as solar shading, consideration of the building orientation and solar-controlled glazing.

53. Development Plans should promote improvements to water supply infrastructure to contribute to security of supply. This should be done in a timely, efficient, and sustainable manner taking

energy consumption into account. This could include planning conditions to restrict levels of mains water usage and implement smart meter schemes to measure water usage.

Q.41: Do you agree with the changes proposed to Paragraph 155 of the existing National Planning Policy Framework?

54. We support making changes to Paragraphs 155 and 158 of the existing National Planning Policy Framework to enable the re-powering of renewable and low carbon energy where planning permission is needed, and providing that the impacts of any development proposal are or can be made acceptable in planning terms.

Q.42: Do you agree with the changes proposed to Paragraph 158 of the existing National Planning Policy Framework?

55. We have no disagreements on the proposed plans to encourage the life-extension of existing renewable energy sites.

Q.43: Do you agree with the changes proposed to footnote 54 of the existing National Planning Policy Framework? Do you have any views on specific wording for new footnote 62?

56. We agree in principle to the proposed changes to footnote 54 of the existing National Planning Policy Framework. However, the development of new wind turbines must not come at the expense of greater housing development.

We agree in principle with the wording for the new footnote 62. Similarly with our views of the current footnote 54, Local Plans and subsequent developments should be able to demonstrate how housing targets can be met alongside other priorities and developments outside of residential housing.

57. In addition to ensuring these plans do not impact housing targets, we urge the Department to issue further detailed planning guidance, including what 'satisfactory' assessment of local impacts means in practice, will be key to ensure projects can progress.

58. We believe that it is fundamental for members of communities to be consulted and have their views heard in the decision-making process to ensure long-term support and progress to net zero. Local planning authorities must work closely with onshore developers to engage communities, but any new arrangements must be workable and practical.

Q.44: Do you agree with our proposed new Paragraph 161 in the National Planning Policy Framework to give significant weight to proposals which allow the adaptation of existing buildings to improve their energy performance?

59. We agree with this proposal and allow the adaptation of existing buildings to improve their energy efficiency. However, we would also like to see proposals that improve the energy efficiency of residential buildings as well. Agents and landlords have been outspoken over the unaffordability

of retrofitting homes to meet EPC targets which cannot be achieved on any scale without financial support. We make the following two observations:

- Research carried out by Propertymark in our 'Lagging behind: energy efficiency in low viability properties' report says that in some local authority areas of the north and midlands, the estimated costs of improving home energy can be around 25 per cent of property values, while in affluent parts of London and the southeast retrofitting with heat pumps represents less than two per cent of overall property value.⁵
- A Propertymark letting agent member managing 381 properties across England said they only have one property at EPC Band A, 30 properties at EPC Band B, 96 properties at EPC Band C, 145 properties at EPC Band D, 106 properties at EPC Band E and three properties that are exempt. They are extremely concerned that without significant financial support for landlords nearly 68 per cent of their portfolio will not reach the UK Government's proposed target of EPC Band C.⁶

60. If the National Planning Policy Framework proposals could include the adaptation of existing residential buildings to improve their energy performance, then substantial progress can be made to retrofit domestic properties.

Q.45: Do you agree with the proposed timeline for finalising local plans, minerals and waste plans and spatial development strategies being prepared under the current system? If no, what alternative timeline would you propose?

61. We believe that local planning authorities would be in the best position to advise on this question, however we continue to encourage urgency in developing solutions to the current housing crisis.

Q.46: Do you agree with the proposed transitional arrangements for plans under the future system? If no, what alternative arrangements would you propose?

62. We believe that local planning authorities would be in the best position to advise on this question, however we continue to encourage urgency in developing solutions to the current housing crisis.

Q.47: Do you agree with the proposed timeline for preparing neighbourhood plans under the future system? If no, what alternative timeline would you propose?

63. We believe that local planning authorities would be in the best position to advise on this question, however we continue to encourage urgency in developing solutions to the current housing crisis.

⁵ [Lagging behind: energy efficiency in low-viability properties | Propertymark](#)

⁶ <https://www.propertymark.co.uk/resource/consultation-improving-the-energy-performance-of-privately-rented-homes.html>

Q.48: Do you agree with the proposed transitional arrangements for supplementary planning documents? If no, what alternative arrangements would you propose?

64. We believe that local planning authorities would be in the best position to advise on this question, however we continue to encourage urgency in developing solutions to the current housing crisis.

Q.49 Do you agree with the suggested scope and principles for guiding National Development Management Policies?

65. We agree in principle with the suggested scope and principles for guiding National Development Management Policies. We urge the Department to ensure that local plans cannot undermine national policies, including a commitment to meeting local housing targets. This can help provide a balance of ensuring local homes are built based on local need but that the total supply is level with national priorities.

Q.50 What other principles, if any, do you believe should inform the scope of National Development Management Policies?

66. We are happy with the current principles of National Development Management Policies.

Q.51: Do you agree that selective additions should be considered for proposals to complement existing national policies for guiding decisions?

67. We agree in principle, that selective additions should be considered. This will allow for additional policies to be added to ensure that local authorities are able to develop plans that resolve issues of national importance.

Q.52: Are there other issues which apply across all or most of England that you think should be considered as possible options for National Development Management Policies?

68. Our primary concern is the undersupply of housing across all tenures should be considered a National Development Management Policy. However, we understand that the extent of housing undersupply in differs across the UK. The emphasis on a National Development Management Policy should therefore stress the need to understand the local housing need across different tenures and develop a local plan that specifically addresses how the local authority to deliver these new homes.

Q.53: What, if any, planning policies do you think could be included in a new Framework to help achieve the 12 levelling up missions in the Levelling Up White Paper?

69. If the UK Government is looking to promote its levelling up missions through the planning system, we would recommend that weighting should be given to developments that directly show they will be achieving those missions. This could be delivered through mandating that all planning applications provide clear evidence of contributions to any relevant missions.

Q.54: How do you think the Framework could better support development that will drive economic growth and productivity in every part of the country, in support of the levelling up agenda?

70. Building homes in the right areas so that there are more attractive places to move ensures that there is adequate housing across England for people to work and live long term. Ensuring adequate housing with the right community assets enables people to have a greater choice of where they can live and work. This is fundamental to ensuring that regions of stagnant growth can level up. The UK Government should consider linking the Framework to areas that have been prioritised through the Levelling Up Fund. Regions that require additional homes or commercial developments will need local plans and a national framework that helps to facilitate their proposals and generate greater economic growth and productivity.

Q.55: Do you think that the government could go further in national policy, to increase development on brownfield land within city and town centres, with a view to facilitating gentle densification of our urban cores?

71. Propertymark would encourage this as it would provide housing where there is already high demand. It also ensures that amenities are close by and that fewer new community facilities would be required to be built.

Q.56: Do you think that the government should bring forward proposals to update the Framework as part of next year's wider review to place more emphasis on making sure that women, girls and other vulnerable groups feel safe in our public spaces, including for example policies on lighting/street lighting?

72. This question lies outside the expertise of Propertymark, we would recommend directly consulting advocacy groups who cover these issues.

Q.57 Are there any specific approaches or examples of best practice which you think we should consider to improve the way that national planning policy is presented and accessed?

73. We would consider any answers provided by local planning authorities to be sufficient in providing alternative approaches or examples of best practice.

Q.58 We continue to keep the impacts of these proposals under review and would be grateful for your comments on any potential impacts that might arise under the Public Sector Equality Duty as a result of the proposals in this document.

74. This question lies outside the expertise of Propertymark, we would recommend directly consulting advocacy groups who cover these issues.