

Submission on the December 2025 National Planning Policy Framework draft consultation

Just Neighbourhoods? Research Team March 2026

Introduction and scope of the submission

This response draws partly on evidence from the 3-year *Just Neighbourhoods* research project, see: <https://research.reading.ac.uk/justclp/> which examined questions of social and spatial justice, deprivation and participation in neighbourhood-level planning and governance across the United Kingdom.

Our submission restricts itself to questions of how the planning system plays a role in pursuing social justice and its orientation and resilience in a context of lack of trust and unstable, fragmented politics. It is also based on our own expertise researching planning in deprived areas. National policy should be worded to ensure that decisions and outcomes are fair and helpful in areas exhibiting high levels of deprivation and is adequately proofed to ensure that goal. Our response to select questions in the consultation follow this introductory text.

We take the view, based on many years of experience researching and operating with the planning system in England, that good growth a growth that is locally sustainable is a useful objective and to achieve this in the context of deprived areas, this can only be realised by working with communities. To this end, we consider three aspects which are important here and the impacts of which need to be reflected in policy nationally:

- *Purposes of planning* – and the meaning of ‘social progress’ cited in NPPF para. 15.
- *Legitimacy* of the planning process – both in plan-making credentials and decision—making.
- Local *relevance* of planning process and outcomes – both in plan-making and planning decisions.

We are aware that not all of the contents of the response below will be reflected directly in the NPPF text and should be addressed elsewhere in guidance or via legislation, or indeed by creating special arrangements for areas experiencing high levels of deprivation. However, some of our points and recommendations should be reflected across the NPPF.

The spirit of our submission lies with calling for the NPPF to be proofed for its impacts on deprived areas, and for the ‘social objective’ of sustainable development to be strengthened, particularly given that prior to 2012 national planning policy was explicit in its recognition of social justice and of equity. The former PPS1 (para. 16) was clear in asserting that plans should ‘seek to reduce social inequalities’. In our view it is time that this aim be restored through the NPPF. The recognition of the social dimension of sustainable development presently in the NPPF does not go far enough:

“A social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the

needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible community facilities, public service infrastructure and open spaces that reflect current and future needs and support communities' health, social and cultural well-being" (NPPF draft 2025, p.5).

Planning has the potential to improve the quality of life of those who live within deprived neighbourhoods. We argue that plans need to be aligned to the needs and issues in the areas they serve. There are persistent challenges in aligning planning systems to positively address place-based inequality.

We note that, increasingly, the importance of community engagement and place-based approaches to tackling socio-economic challenges has been acknowledged. The success of the Government's planning reform agenda also depends on whether communities regard the system as legitimate. This speaks to broader concerns over trust and dissatisfaction with politics. Therefore, much greater effort and transparency is needed in plan-making. National planning policy therefore needs to ensure that local knowledge and community priorities will meaningfully shape planning decisions. This requires stronger recognition of co-produced planning processes as important sources of evidence and insight. Neighbourhood planning and its support in deprived areas is one existing means to assist in this but could perform much better if policy and guidance encourage this (along with appropriate resourcing).

Overall, the submission invites government to examine how planning systems can more effectively incorporate bottom-up knowledge and evidence from communities. Neighbourhood-scale plans in deprived areas should be co-produced and mutually agreed, rather than defined by institutional actors. This can be achieved through working with partners in the community and with intermediaries and council officers in co-production. This latter concept should feature in policy and guidance. Pre-determining the scope of plans can constrain community voice and reproduce top-down solutions.

National policy should also consider how hyper-local plans are framed and commissioned. At present, many neighbourhood plans are constrained – reducing their ability to reflect conditions and priorities and undermining willingness to volunteer. Plans should be *co-produced* and *mutually agreed*, allowing communities greater scope to identify and articulate the issues they face.

NPPF 2025 draft - consultation sections / questions

In terms of the sections of the draft NPPF and associated consultation, our introductory comments are restricted to the following questions:

PM1 – the NPPF draft states that '*Development plans are the best way for communities to shape decisions about how to deliver the housing and wider development their areas need*'

If this is to be so then high quality, meaningful engagement is needed. Meaningful engagement with communities is crucial for the planning system - this provides greater accountability and fosters greater trust in the system. Yet engagement alone is unlikely to be enough. It is important that co-production is supported, in this way greater shared

ownership of plans and the aims of plans will be developed and better reflect the needs of deprived areas. This will in turn support less opposition to planning decisions and more place-sensitive solutions to be applied.

Q6 – Role, purpose and content of SDS

SDSs should explicitly recognise areas where particular attention to social inequality and deprivation exists, and encourage positive development that would help appropriate economic development in such areas.

Q9 – Role purpose content of local plans

Ditto answer to Q6 above. Such areas need to be clearly recognised and specific policy to help address deprivation and actions to tackle it be inscribed in local plans.

Q20 – Other comments on the plan-making section

Planning policy should help to ensure that inputs sub-regionally and locally as well as at neighbourhood-scale are representative, inclusive and that weight is accorded to views elicited from deprived area residents. For this to be meaningful greater efforts to apply tools and techniques appropriate to task will be needed. These should be mandated via local plans. Secondly, to ensure that views have been assessed and applied these should be shared with residents in a timely way.

Q26 - Impact of DM5: development viability

Policy in relation to use of DVA should not be allowed to undermine social housing requirements, particularly in areas of socio-economic deprivation. We argue that the ability to challenge or renegotiate after a planning permission has been granted should be removed entirely. This will help create certainty and aligns with the proposed greater reliance on clear rules in the planning system. Moreover it will instil greater trust in the system on its ability to deliver on social goals.

PM5 – Neighbourhood plans

PM5 restates that neighbourhood plans allow local communities to plan positively for the development and use of land in their area. It emphasises that neighbourhood planning remains a mechanism for community-led place shaping within the wider planning system.

We would like to see a greater degree of local agenda setting and evidence role for neighbourhood-scale planning. Part of this should involve the introduction of a wider community mapping element to NDP production which leads to either a full plan, or the option of creating a neighbourhood priorities statement (NPS) that has license to express issues and priorities that extend beyond land-use planning and will assist in other ways, such as informing regeneration planning and health programmes, and s106 and CIL spending. Such matters should feature in guidance.

Neighbourhood planning remains an important mechanism through which communities can influence planning decisions. However, participation in neighbourhood planning is uneven and often limited in more deprived areas. Communities in disadvantaged neighbourhoods frequently face significant barriers to participating in neighbourhood

planning processes, including limited capacity and lack of resources, but this has been mostly due to weaker institutional support and trust in these areas - that leads to lack of take-up. It is also emerging that lack of recognition of some plans by decision-makers is also an issue. NPPF policy needs to assert more strongly the way in which NDP policy and priorities in NPSs are taken into account - particularly as we move towards a more rules-based system.

While it is appropriate that neighbourhood plans align with strategic development policies, reforms should ensure that neighbourhood planning remains a meaningful tool for communities to articulate local priorities, including informal or non-planning related priorities, rather than simply reinforcing strategic development objectives – particularly if such ‘strategic’ objectives are blind to issues of deprivation and inequality often found in neighbourhoods across a given local or sub-regional territory.

Strengthening community engagement is an important objective. However, engagement should not be understood solely as a procedural requirement within plan-making processes. The ability of residents and local organisations to build trust, negotiate differences, develop shared visions for their neighbourhoods, and maintain long-term participation in local decision-making is important. However, past experience in many disadvantaged neighbourhoods is of regeneration programmes and planning interventions that have operated over the heads of local people and have produced scepticism of the limited involvement of communities. Building trust between communities and institutions therefore requires long-term relationship building rather than one-off consultation exercises – plan-making need to support ongoing partnership relations. Greater specificity is needed in policy; the pertinent questions here resolve to: who is being engaged with? And what happens to the product of such engagement? Improving the efficiency of plan-making is a reasonable objective. In neighbourhoods facing multiple forms of disadvantage/deprivation, participation in planning processes often requires additional time and support. Compressing consultation processes may risk excluding communities that are already underrepresented in planning decision-making. The pursuit of speed should not come at the expense of meaningful community engagement in such circumstances. Indeed, in some cases, it can mean that speed / haste leads to negative long term socio-economic consequences and further mistrust of institutions.

A balanced approach is therefore needed, ensuring that plan-making processes remain accessible to communities, while also addressing the need for timely plan preparation.

Chapter 2 - how planning applications are handled

DM1 - Levels of engagement according to the scale of development

We would like to see minimum requirements for the levels of pre-application engagement with oversight over how early engagement is taking place and responded to. Results of such pre-application discussions should be made public.

HO1 and HO2: Assessing the needs for homes

Q49. Is further guidance required on assessing the needs of different groups, including older people, disabled people, and those who require social and affordable housing?

Further guidance is needed on assessing the needs of different groups, and ensuring that their interests are being served, including older people, disabled people, and those requiring social housing. These should not be capable of being negotiated away (see Q26 response). Need should also be expressed in place terms too - as well as being a group-based concern. Assessing needs in planning and development terms are about place-making, linking appropriate housing, employment, and services and these are often unevenly experienced across deprived neighbourhoods. It is all too clear that needs in relation to place can be obscured when assessment is undertaken only at a broad authority-wide scale or where engagement fails to be inclusive – the context and magnitude of need in deprived areas should be reflected in policy.

Guidance should make clearer that assessing need is not simply a matter of demographic projection or overall housing numbers. It should help authorities identify how different groups experience need in practice, including barriers relating to affordability, accessibility, service access, health, mobility, and the suitability of homes and neighbourhood environments.

Guidance should also set out expectations for the types of evidence authorities should draw upon, including local administrative data, health and housing evidence, and engagement with affected groups and communities. This is important because place-specific knowledge can reveal forms of unmet need that are not always visible in aggregate data.

In particular, policy and guidance should explain how identified needs should then be reflected in policy and delivery for example in relation to housing, including site allocations, tenure mix, accessible and adaptable housing standards, and the location of homes in relation to services, transport and community infrastructure. Without this, the identification of need may not translate into meaningful outcomes.

Q158 - Do you agree with the approach to planning for healthy communities in policy HC1, including the expectation that the development plan set local standards for different types of recreational land, drawing upon relevant national standards?

The NPPF's focus on healthy communities aligns with growing recognition of the role that the built environment plays in shaping health outcomes. Access to green space, walkable neighbourhoods and community facilities all contribute to wellbeing. Our research has highlighted the importance of everyday neighbourhood spaces in supporting community life. Community gardens, libraries, local parks and informal meeting places were repeatedly identified as vital to residents' sense of belonging and quality of life. Planning policies that protect and enhance these assets therefore play an important role in promoting healthier communities.

HC1: Planning for healthy communities

Health and wellbeing can be of particular importance in areas of socio-economic deprivation and policy nationally and locally should reflect the importance of social infrastructure in respect of this dimension (and see Q162 response).

Q162 - Do you agree with the proposed approach to retaining key community facilities and public service infrastructure in policy HC6?

The NPPF's focus on healthy communities aligns with a growing recognition of the role that the built environment plays in shaping health outcomes. Access to green space, walkable neighbourhoods and good community facilities all contribute to wellbeing. Similarly, community gardens, libraries, local parks and informal meeting places are repeatedly identified in research findings as vital to a sense of belonging and quality of life. Planning policies that protect and enhance these assets therefore play an important role in promoting healthier communities. Such policies need to be stressed in areas of deprivation - particularly where rankings highlight IMD 'health' and 'living environment' domain rankings to be high.

Q224 - Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic?

This question needs to be considered in relation to places as well as people. The impact of national policy on deprived neighbourhoods should be understood and the NPPF and other guidance should reflect how social inequality has been considered.

Q225 - Is there anything that could be done to mitigate any impact identified?

People with protected characteristics under the Equality Act 2010 may experience disproportionate impacts from planning and development decisions, particularly in neighbourhoods experiencing persistent deprivation.

People living in deprived areas with protected characteristics, including older people, disabled people, and some ethnic minority communities, often face greater barriers in accessing suitable housing, local services and community facilities. These challenges can be intensified where planning decisions reshape neighbourhoods without sufficiently considering how different groups experience place (and opportunities to engage).

For example, older and disabled residents may be particularly affected where new development does not deliver accessible and adaptable homes, or where changes to neighbourhood infrastructure reduce access to services, public transport, and local support networks. The loss of community facilities can also have disproportionate impacts on groups who rely most heavily on nearby services and social infrastructure.

To mitigate these risks, planning policy should:

- ensure sufficient provision of accessible and adaptable housing
- require authorities to consider equality impacts in place-based planning decisions
- support inclusive and accessible engagement processes
- strengthen protections for community facilities and social infrastructure.

Ensure that planning decisions reflect the needs of different groups will help support more inclusive and equitable neighbourhood development. In short spatial justice considerations should be reflected in national planning policy and associated guidance.