

# Design Council consultation submission: Design and Placemaking PPG and National Planning Policy Framework

The Design Council is the national champion for the effective use of design for the benefit of the UK economy, society and environment. Good placemaking integrates environmental performance, economic vitality, health, inclusion and public safety from the outset.

**80% of environmental impact is determined at the design stage** and the built environment accounts for 25% of all the UK's total greenhouse gas emissions. To address this two-thirds of designers are already addressing environmental concerns through their work, and design has a vital role to play in creating sustainable homes, communities and infrastructure. The planning system must treat design not as aesthetic preference but as core infrastructure.

This response is informed by consultation with our Design Council Experts network, and the findings of our recent *Design for Neighbourhoods* report and the work of the Design Council Homes Taskforce.

The Design Council Homes Taskforce convened senior leaders from across the built environment — including developers, local authorities, housing providers, planners, designers and infrastructure specialists — to address systemic barriers to delivering high-quality housing. Its purpose was to align policy, investment and design practice to ensure new homes contribute to thriving neighbourhoods rather than isolated units of delivery.

The Taskforce delivered the *Design for Neighbourhoods* report which set out a practical framework for delivering high-quality, climate-resilient, socially cohesive neighbourhoods at scale. It emphasises systems thinking, stewardship, environmental performance, social infrastructure and long-term value creation.

Together, this evidence base reinforces the importance of embedding design quality, safety and stewardship at the heart of planning reform.

## Executive Summary

The Design Council welcomes the opportunity to respond to the consultations on the Design and Placemaking Planning Practice Guidance (PPG) and the draft National Planning Policy Framework (NPPF). In order to ensure the consultation benefits from the practical insights and real-world experiences of designers, we have also engaged our network of Design Council Experts – 250 design pioneers representing the full spectrum of design disciplines, regional and demographic diversity, and skills that are helping accelerate our Design for Planet mission.

We support the ambition to strengthen design quality within the planning system. However, there are structural and practical risks that could undermine the effectiveness of the guidance.

The insight from the Design Council Homes Taskforce and from our Design Council Experts is clear: quality, safety and sustainability are not barriers to delivery. They are enablers of long-term economic, environmental and social value:

- Design quality and delivery are not competing objectives
- Safety, sustainability and stewardship are mutually reinforcing
- Systems thinking at neighbourhood scale is essential to meeting national missions on housing, climate and health

The Design Council also plays a central role in turning guidance into practice — through our national capability-building programmes, support for local authorities, and the Design Value Framework, which helps teams embed sustainability, stewardship and long-term value into decision-making.

While this submission focuses on creating new places, it is important to note that good design principles must apply consistently across both new development and the existing built environment. A whole-stock approach — encompassing retrofit, infill, reconfiguration and stewardship of existing neighbourhoods — is essential to achieving climate goals, supporting sustainable development, strengthening local identity and ensuring the creation of well-connected, thriving places. This approach maximises the long-term value of the national housing stock and reinforces the role of design in shaping resilient, inclusive neighbourhoods.

A whole-stock approach is also essential to meeting national housing targets within planetary boundaries. Maximising the potential of existing homes through retrofit, infill, reconfiguration and stewardship reduces embodied carbon, minimises land consumption and infrastructure demand, and accelerates delivery far more sustainably than relying solely on new-build supply. Integrating new development with the adaptive reuse of the existing built environment enables the planning system to meet housing need while staying within the UK’s legally binding carbon targets and wider environmental limits.

## Five priority recommendations

### 1. Align the PPG explicitly with the NPPF and protect design scrutiny

Resolve structural tensions between the ambition of the PPG and delivery-driven policy. Design quality, sustainability, and safety must be intrinsic to sustainable development — not secondary considerations in the pursuit of housing numbers. These objectives must be delivered together rather than traded off under viability arguments or presumption-led policies.

### 2. Make design codes enabling, proportionate and locally responsive

Codes must provide clarity and certainty while remaining context-sensitive and innovation-friendly. Avoid cumulative technical overload and ensure scaled information requirements so that smaller schemes are not subject to the same reporting burden as strategic sites. Reform should increase clarity and certainty — not centralise decision-making at the expense of local responsiveness.

### 3. Reform process fragmentation and invest in capability

Strengthen the planning system’s ability to deliver high quality design by:

- Establishing a National Design Review Framework to provide consistent, multidisciplinary, systems-level design scrutiny and support local authorities with access to high-quality expertise

- Introducing a Neighbourhood Design Advisor role within local authorities to provide place-based design leadership, coordinate multidisciplinary inputs and ensure neighbourhood-scale thinking and long-term value are embedded from the outset
- Addressing siloed statutory consultation and improving coordination across disciplines
- Investing in in-house design and planning expertise, and building design literacy among non-design professionals
- Embedding early-stage tools including visioning workshops, multidisciplinary design reviews and value-based decision-making

#### **4. Embed stewardship, systems thinking and lifecycle value**

Shift focus from consent-stage compliance to long-term neighbourhood performance. Planning should reinforce movement, identity, liveability, green infrastructure and proportionate Biodiversity Net Gain expectations. Design solutions that address obesity, loneliness, climate resilience and safety deliver real societal value — even where short-term monetisation is difficult.

Long-term value emerges when movement, nature, social infrastructure and stewardship are deliberately connected — for example where walkable networks align with green/blue infrastructure and local services to support everyday life, climate resilience and inclusion. Planning guidance should therefore frame connectedness as a practical systems requirement, not an optional placemaking enhancement.

Meeting housing demand within the UK’s carbon budgets also requires a whole-stock approach — maximising the potential of existing homes through retrofit, infill, reconfiguration and stewardship. This reduces embodied carbon, avoids unnecessary land take, and enables faster, more sustainable forms of housing delivery.

#### **5. Embed safety and play as integrated placemaking outcome**

Frame safety as an emergent property of good neighbourhood design, not a compliance overlay. CPTED must be presented as a broad, multidisciplinary approach. Transparency on security stakeholder engagement should be strengthened, and national guidance should promote outcomes rather than imply singular accreditation routes.

The NPPF and PPG should also recognise that while play and child-friendly design contribute to safer, more active and naturally supervised environments, their importance extends far beyond safety. Evidence shows that designing for children supports independent mobility, wellbeing, identity, community cohesion and long-term neighbourhood vitality. Play should therefore be embedded as a core placemaking principle, reflecting its wider role in shaping inclusive, healthy and resilient neighbourhoods.

All five of these recommendations must be underpinned by sustained investment in capability building and knowledge sharing, supported by organisations such as the Design Council.

### **Greater alignment with the NPPF**

A fundamental issue identified by our Experts is the inherent conflict between the ambition of the Design and Placemaking PPG and the current framing of the National Planning Policy Framework.

The PPG articulates a strong vision for:

- High-quality, context-responsive design

- Stewardship and long-term value
- Integrated placemaking

However, the NPPF's emphasis on speed of delivery, housing numbers and streamlined approvals risks superseding qualitative judgement. If design guidance is perceived as secondary to delivery metrics, quality may be compromised in practice.

The Homes Taskforce identified this misalignment as a structural barrier: where delivery metrics dominate, long-term neighbourhood quality, safety integration and environmental performance are often deprioritised or negotiated down under viability pressures.

This concern is reinforced by the recently published MHCLG Appraisal Guide<sup>1</sup>, which requires development interventions to demonstrate clear public value. Design quality, green infrastructure and neighbourhood structure should therefore be recognised within planning guidance as delivering measurable social and environmental benefits rather than discretionary enhancements.

The PPG would also benefit from clear definitions of net and gross residential density. Inconsistent use of density assumptions in plan-making, masterplanning and design coding can lead to unrealistic site capacity estimates and insufficient space for green infrastructure, streets and community facilities.

*Design for Neighbourhoods* demonstrates that neighbourhood-scale thinking — integrating housing, green infrastructure, mobility, social infrastructure and stewardship — is essential to achieving net zero, public health and social cohesion goals. These ambitions must be structurally reinforced, not positioned as secondary considerations.

Green infrastructure should be recognised as a core spatial framework for neighbourhood design. Networks of parks, trees, water systems and habitat corridors provide climate resilience, health benefits, biodiversity recovery and place identity. Design codes and planning guidance should therefore embed green infrastructure structure at the outset of spatial planning rather than treating it as a residual element of site layout.

The presumption in favour of suitably located development, if not carefully framed, risks weakening design scrutiny. Similarly, greater centralisation of decision-making may reduce the role of local contextual judgement.

Achieving realistic, climate-aligned housing delivery also requires recognising that whole-stock strategies — including retrofit, intensification and adaptive reuse — are essential to meeting housing need within carbon budgets and environmental limits. Without incorporating the existing built fabric into spatial strategies, plan-making risks over-reliance on land-hungry new development that is incompatible with net-zero pathways.

Design quality, sustainability, and placemaking must be explicitly recognised as intrinsic to sustainable development, not negotiable add-ons.

## Reforming structural barriers

Our Experts consistently highlight that high-quality design is often compromised by systemic barriers:

<sup>1</sup> Guidance. The MHCLG Appraisal Guide. Updated 18 February 2026-  
<https://www.gov.uk/government/publications/the-mhclg-appraisal-guide/the-mhclg-appraisal-guide#chapter2>

### **Fragmented consultation**

Highways, heritage, utilities and environmental consultees often operate in silos. Conflicting technical requirements lead to compromise solutions that dilute placemaking ambition.

Greater coordination and integrated review processes would unlock higher-quality outcomes. Embedding multidisciplinary design reviews at key stages would help reconcile competing technical inputs early, strengthen contextual judgement, and ensure placemaking quality is not diluted through siloed consultation.

A more integrated approach to spatial planning is required. Contemporary practice increasingly adopts landscape-led spatial planning, where landscape and environmental systems structure development from the outset. In this approach the design process typically considers:

- landscape systems
- water systems
- movement networks
- built form

While the guidance promotes systems thinking, it does not explicitly frame landscape as the organising framework for neighbourhood design. Embedding this principle would help integrate environmental performance, climate resilience and placemaking outcomes more effectively.

### **Inconsistent interpretation**

Variability between authorities and even between officers within authorities creates risk and uncertainty. Developers are discouraged from proposing innovative, higher-cost solutions when design interpretation is unpredictable.

Clarity must not come at the cost of professional judgement, but consistency in application is essential. This underscores our wider recommendation that improving consistency requires sustained investment in capability, expertise and systems-level design thinking across planning teams and statutory consultees.

### **Cumulative technical overload**

The volume of reports, red tape and compliance requirements disproportionately affects SMEs and smaller schemes. While we welcome the PPG's recognition of medium-site development and smaller developers, small schemes should not carry the same reporting burden as strategic sites.

Scaled information requirements and proportionate processes are critical.

## **Design codes**

Design codes can provide certainty and improve consistency. However, our Design Experts have strongly cautioned against rigid or overly prescriptive approaches.

They point to codes being most effective when they are:

- Evidence-based
- Context-specific
- Integrated with environmental and mobility systems
- Developed through meaningful community participation
- Linked to long-term stewardship models

- Formally adopted by the local planning authority, for example as a Supplementary Planning Document

Overly rigid codes risk constraining innovation in climate adaptation, modern construction methods and integrated safety strategies.

There are also examples of local authorities placing responsibility for creating design codes entirely at developer discretion. This undermines the purpose of codes as tools for public value and shared expectations.

To be effective, design codes should be formally adopted so that they carry weight as a material consideration in decision-making. Codes that lack formal status are less likely to be consistently applied.

Green infrastructure should be recognised as a core spatial framework within design codes, structuring movement networks, water systems and public space rather than being treated as residual landscape.

The PPG should emphasise that codes are enabling frameworks, not aesthetic checklists. Poorly framed codes risk template-based outcomes and reduced responsiveness to emerging risks, particularly environmental concerns.

## Capacity and capability

Ambition within the PPG must be matched by capability.

Our Experts and the Homes Taskforce highlighted considerable gaps in:

- In-house urban design expertise
- Design literacy within planning teams
- Systems-level neighbourhood planning skills
- Security literacy and proportional risk assessment
- Independent, multidisciplinary design review

The Design Council's national capability programme directly responds to these gaps, supporting planning teams and non-design professionals to build design literacy, apply systems-level approaches and use early-stage tools effectively. Through training, the Design Value Framework and the expertise of our Expert network, we are able to help translate national policy ambitions into consistent, practical outcomes across local authorities.

Without sufficient capability, high-level guidance risks becoming procedural compliance rather than outcome-driven placemaking.

Investing in early-stage design capability reduces downstream conflict, improves viability outcomes and increases public trust, ultimately accelerating delivery rather than delaying it. This must include a holistic approach to capability building – strengthening in-house design and planning expertise within local authorities, supporting non-design professionals to develop design literacy, and embedding a suite of early-stage tools such as visioning workshops, multidisciplinary design reviews, value-measurement approaches and ongoing capability development.

Building design literacy should include practical methods for mapping and testing neighbourhood connectivity (walkability, cycling permeability, public transport access, green network continuity and social infrastructure catchments) so that connectedness is evidenced and iterated from concept through to delivery.

To support this, the Design for Neighbourhoods report recommends establishing a dedicated Neighbourhood Design Advisor role within local authorities. This would [Design and Placemaking PPG and National Planning Policy Framework](#)

provide consistent, place-based design leadership — helping coordinate multidisciplinary inputs, strengthen design literacy across teams, and ensure neighbourhood-scale thinking and long-term value are embedded from the outset. A Neighbourhood Design Advisor would play a vital role in turning national guidance into practical, high-quality outcomes on the ground.

To strengthen national consistency and raise the baseline of design quality, Government should establish a National Design Review Framework. This Framework would set clear expectations for high-quality, multidisciplinary design review, support local authorities to develop or enhance their own design review arrangements, and provide access to specialist expertise where capacity is limited.

Building on principles set out in *Design for Neighbourhoods*, the Framework would promote systems-level evaluation — integrating landscape, movement, environmental performance, social infrastructure and stewardship — ensuring that strategic and complex schemes are assessed through a holistic neighbourhood lens. It would also help reduce regional inconsistency, support proportionate review processes, and embed shared national standards while retaining local responsiveness.

A further capability gap within the current system is the limited role given to citizens in shaping the vision, design and stewardship of their neighbourhoods. Meaningful participation is too often replaced by late-stage consultation that is tokenistic and disconnected from decision-making. Embedding citizens throughout the process — through co-design methods, early visioning, participatory workshops and ongoing stewardship structures — leads to stronger local legitimacy, better design outcomes and long-term neighbourhood success. The PPG should therefore emphasise citizen participation as a core component of effective placemaking, not an optional add-on.

## Stewardship, systems thinking and long-term value

One of the central findings of *Design for Neighbourhoods* is that long-term neighbourhood success depends on stewardship structures that extend beyond planning consent.

Safety, environmental performance and social cohesion are reinforced through:

- Active stewardship models
- Clear governance structures
- Ongoing maintenance and adaptation
- Community participation in management
- Integrated green and blue infrastructure

Stewardship of the existing built environment is therefore a critical component of climate-aligned housing delivery. Whole-stock approaches — which prioritise retrofit, reconfiguration and sensitive intensification — deliver significant lifecycle carbon savings while enabling neighbourhoods to evolve in a resource-efficient way that supports climate resilience and long-term value.

The cost of tackling entrenched issues such as net zero, loneliness, obesity can appear high when assessed in isolation. Yet design teams frequently propose integrated solutions addressing all three and more. The societal benefits are real but difficult to monetise within conventional viability models. Planning should prioritise lifecycle performance over consent-stage compliance and recognise this preventative value.

Similarly, infrastructure-heavy uses such as data centres must be considered within wider spatial systems, particularly in relation to continually rising energy and water demand and community cohesion.

The Homes Taskforce highlighted that planning often focuses on approval rather than lifecycle performance. However, climate resilience, safety and neighbourhood vitality are long-term design challenges. Neighbourhoods designed for walkability, mixed use, natural surveillance and strong community identity support both safety and quality of life.

Active travel infrastructure — continuous, safe and attractive walking and cycling networks — should be treated as essential spatial systems rather than optional enhancements. Designing connected active travel routes that align with green and blue infrastructure and social infrastructure unlocks significant health, climate and inclusion benefits. Embedding active travel from the outset ensures neighbourhoods support low-carbon mobility, everyday physical activity and accessible routes for all ages.

The PPG should therefore reflect the wider Design Value Framework by emphasising how design delivers multiple, interconnected outcomes including safety, sustainability, stewardship and long-term social value.

## Integrating safety and play within placemaking

Safety and security are fundamental to successful neighbourhoods. However, they must be embedded through good design rather than layered on through narrow compliance mechanisms. Safety and security are fundamental to successful neighbourhoods but safety emerges from integrated placemaking systems not isolated compliance measures.

Neighbourhoods that succeed over time share common characteristics:

- Active streets and mixed uses
- Clear but permeable spatial structure
- Strong community identity
- Good lighting, sightlines and passive surveillance
- Stewardship and ongoing management

These are core Crime Prevention Through Environmental Design (CPTED) principles — but they are also core placemaking principles.

### Accurate framing of CPTED

Professional security feedback highlights concern that CPTED risks being presented too narrowly in the draft PPG.

CPTED is a broad, multidisciplinary body of practice encompassing:

- Spatial layout and permeability
- Natural surveillance and activity
- Public realm activation
- Management and stewardship
- Proportional security measures
- Social infrastructure and community cohesion

Oversimplifying CPTED or associating it too closely with a single framework risks undermining both innovation and effectiveness, reducing a sophisticated, evidence-based approach to a compliance exercise.

### Avoiding over-reliance on a single route

The draft PPG’s apparent emphasis on Secured by Design has raised concerns among experienced practitioners.

While Secured by Design has an established role, over-reliance on one commercial or accreditation pathway may:

- Narrow professional diversity
- Constrain innovation
- Reduce flexibility in responding to different contexts
- Create perceived market distortions

National guidance should promote outcomes (i.e. safe, inclusive places) rather than prescribe a singular delivery mechanism.

### **Recognising a plurality of expertise**

Contemporary development involves multidisciplinary security input, including Chartered Security Professionals, accredited consultants, planners, designers and policing specialists.

A competency-based model that recognises a breadth of qualified professionals would:

- Improve innovation
- Increase proportionality
- Support contextual solutions
- Strengthen professional confidence in the guidance

Safety should therefore be integrated as a design quality principle, supported by broad professional expertise, rather than treated as a technical bolt-on.

### **The role of play**

The NPPF should more explicitly embed child-friendly planning principles within guidance on healthy communities. This should include reference to established, evidence-based frameworks that support children’s mobility, participation and access to diverse play opportunities — such as the Play Sufficiency Framework used in Wales and Scotland, and the SPACES framework developed by WHO, UNICEF and UN-Habitat, which emphasise safe streets, connected neighbourhoods, access to nature and inclusive public space.

Evidence consistently shows that neighbourhood design shapes children’s opportunities for play and independent mobility. Children’s autonomy and freedom to roam have declined where streets prioritise traffic over everyday social use, while safe and accessible local environments are linked to stronger independence, wellbeing and a sense of belonging.

Embedding access to play and meaningful participation in decision-making contributes to community cohesion, natural surveillance and healthier neighbourhoods. Supporting everyday play is therefore not only a matter of children’s rights but a recognised driver of public health and long-term neighbourhood vitality.

### **Participation**

To align with the UK’s obligations under the United Nations Convention on the Rights of the Child (UNCRC), children should be systematically engaged in the design of play

environments and public spaces that affect them. The phrase “where appropriate” in HC4.2 of the draft NPPF should therefore be removed, as it creates scope for children to be excluded from consultation processes. Meaningful engagement with children is also a core component of the Play Sufficiency approach used by the Welsh and Scottish Governments, which emphasises understanding children’s lived experiences of play within their local environments.

### Replacement of Play Spaces

Where existing play spaces are removed or redeveloped (HC7), the guidance should require that:

- equivalent or improved play opportunities are provided, and
- a child-focused play needs assessment is undertaken where relevant evidence is not already available.

A common challenge when play spaces are replaced is that alternative provision does not reflect the types of play opportunities that children previously used or valued. Applying a structured assessment approach, such as the Play Sufficiency Framework, would help ensure that replacement provision responds to children’s actual play needs and maintains accessible opportunities within the neighbourhood. Integrating this approach alongside the principles set out in the SPACES framework from the World Health Organization would strengthen the NPPF’s ability to support healthy, inclusive and child-friendly communities.

Active travel networks are fundamental to children’s independent mobility and everyday play. Safe, well-connected walking and cycling routes enable children to move confidently between home, school, parks and community spaces, reinforcing both physical activity and social independence. Embedding active travel as core neighbourhood infrastructure supports the wider placemaking goals of connectedness, natural surveillance, community cohesion and healthier environments — ensuring that mobility and play are mutually reinforcing outcomes of good design.

## Conclusion

The Design and Placemaking PPG and NPPF represent a significant opportunity to strengthen the role of design within the planning system. However, to achieve its stated ambition, reform must reflect the five priority recommendations set out earlier — aligning the PPG with the NPPF, ensuring design codes are enabling and context-responsive, investing in capability, embedding stewardship and systems thinking, and integrating safety and play as outcomes of good placemaking.

In practice, this means the PPG must:

- Increase clarity and certainty
- Build capability across planning teams, including design literacy and early-stage design processes
- Preserve local responsiveness and professional judgement
- Maintain and strengthen independent design review panels
- Avoid cumulative technical overload
- Embed proportionate, scaled information requirements

Through our capability-building programmes, the Design Value Framework and our cross-sector Expert Network, the Design Council is well placed to support government and local authorities in putting this guidance into practice and building the skills, confidence and shared knowledge required to deliver high-quality, sustainable neighbourhoods at scale.