

New Towns Draft Programme

Home Builders Federation Response

The Home Builders Federation (HBF) is the principal representative body of the housebuilding industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

HBF welcomes Government's ambitious housebuilding target and recognise the role that New Towns have to plan in creating a sustainable housebuilding programme. HBF does not comment on individual locations or allocations and as such the comments contained within this response focus on the strategic picture and how the New Towns programme fits within the wider planning agenda.

Whilst HBF broadly support the concept of creating New Towns in order to create sustainable places which contribute to the wider housing need, there should be clear recognition in policy that these developments are supplementary to and not instead of housing developments allocated through Local Plans. Whilst it is accepted that New Towns should be able to contribute to meeting local housing requirements, there remains a clear need for a diverse range of sites that can meet the immediate housing needs of a local area.

Question 1

Which of the following best describes how you are responding to this consultation?

- *as an individual member of the public*
- *on behalf of an organisation*
- *as both an individual and on behalf of an organisation*

Question 2

Which area are you responding about?

- *potential new town location*
- *wider region*
- *national interest*
- *I'm not responding about a specific location/region*

Question 3

What is your connection to the proposed location/region?

- *resident nearby*

- *landowner*
- *local authority*
- *developer*
- *environmental organisation*
- *professional interest*
- *no specific connection*
- *other*

Question 4

If you are responding on behalf of an organisation, please select the type of organisation you are responding from below:

- *private sector business*
- *charity*
- *social enterprise*
- *local authority*
- *government department or agency*
- *housing association / registered provider*
- *professional or representative body*
- *academic institution*
- *not applicable*
- *other*

Question 5

If you are responding on behalf of an organisation, please provide the name of your organisation here.

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Question 6

If you are responding on behalf of an organisation, what size is your organisation?

- *micro (1 to 9 employees)*
- *small (10 to 49 employees)*
- *medium (50 to 249 employees)*
- *large (250+ employees)*
- *not applicable / don't know*

HBF does not comment on individual proposals or locations for development and as such this consultation response does not include responses to Questions 7-13.

Section 4.1 - Government offer

Question 14

Do you agree with the overall government offer for proposed new town locations?

(Yes/No/Not sure)

If you answered no, is there any additional support you think should be offered?

The consultation document includes a high-level commitment to funding and provision of expertise in order to bring forward development in the locations identified. However, given the high-level nature of what is currently proposed, it is vital that continued engagement is provided to the sector so that more detail can be provided as to how the Government is developing the package of assistance necessary to bring each location forward.

Transparency is required to ensure that it is clear that any funding to the New Towns programme is not given at the expense of other commitments in terms of housing delivery.

It is currently unclear how extensively Government will need to use Compulsory Purchase Powers and what funds have been allocated for such. CPO should be the last resort and HBF would encourage Government and Local Authorities to work with landowners to bring forward land for development in the first instance. This will allow for swifter, less contentious progression of the New Towns principles and ideals.

Further consultations will be necessary when it is decided where Development Corporations are necessary so that industry can engage on whether these should have Plan making and Decision-making powers and, if so, to what extent. It is important that Local Authorities and communities do not feel marginalised through the development of New Towns and continued engagement with relevant stakeholders is therefore crucial.

Further comments are provided below in respect of design and planning policy around New Towns.

Question 15

Do you think there are any additional interventions that government should consider to ensure design and placemaking quality in new towns?

(Yes/No/Not sure)

If you answered yes, please set out the additional interventions government should consider.

The design and placemaking for New Towns should not be considered significantly differently to other large scale strategic development. The consultation does not include sufficient detail around the process of design review in relation to New Towns and given the Design and Placemaking PPG makes specific reference to Design Review Panels and community engagement, it would be appropriate for this to be referenced in the New Towns programme for clarity and consistency.

In addition, given the national importance of New Towns, it would be appropriate for the design review to be conducted by a Government-led panel, made up of experts across the field and local stakeholders to ensure there is a consistency of approach across the locations.

Section 4.2 - New Towns planning policy

Question 16

How clear do you find the proposed planning policy?

If you answered unclear, which elements are unclear and how would you suggest changing them?

The wording of the draft planning policy is clear but HBF do not consider it to be sufficiently detailed. The New Towns programme is arguably the most important development programme of national significance in a generation and the policy does not reflect the magnitude of the task or demonstrate the commitment necessary to ensure these locations come forward in a timely and holistic manner.

As currently drafted, HBF is concerned that there will need to be extensive local (or regional) planning policies relevant to each of the locations, which could result in delay and inconsistency of approach, to the detriment of the delivery of these locations.

Moreover, there is currently no responsibility placed on infrastructure providers, all of which are fundamental to the delivery of New Towns. Whilst the draft policy requires plan making authorities to identify the infrastructure needs it does not state that infrastructure needs to be provided, require those stakeholders to engage or identify how the viability impact of such requirements are to be considered.

It is acknowledged that some aspects of this are covered in the Draft NPPF (2025) but prior to the publication of the final version of the NPPF, it is not possible to know whether the content will stay the same. Moreover, national policy is subject to change and as such, it is necessary for this to be comprehensively detailed in the New Towns policy itself.

HBF welcomes the clarity provided in the draft policy, which states that “New Towns will contribute towards meeting the identified housing need of relevant strategic and local planning authorities”, but there are significant concerns around the overreliance on New Towns and the utilisation of stepped trajectories to facilitate this. The policy should include specific reference to Plans still needing to identify and allocated a range of sites, that New Towns should not be used to facilitate a stepped trajectory and a five-year land supply will still need to be demonstrate in authorities that have a New Town within its boundaries. Consequently, New Towns should effectively be viewed as providing additionality if the development comes forward sooner than anticipated in the Plan.

The draft policy should be clearer around the expectations of a Design Code or Masterplans. In light of the requirements in the draft Design and Placemaking PPG, it is considered likely that design codes will be required, however, the policy should commit to this for the avoidance of doubt.

It is likely that some of the New Town locations will either cross local authority boundaries, or certainly have cross boundary impacts. Given the regional nature of their impact, it is appropriate that New Towns are identified through a Strategic Development Strategy (SDS), however, SDSs will only identify broad locations. To ensure the locations are protected, in line with the decision making policy, it is considered that a broad location within an SDS should be sufficient to effectively allocate the area without a red line. This should be made expressly

clear in the New Towns planning policy and relevant changes be made to the NPPF in advance of publication.

In relation to the decision making policy, it is not sufficiently specific when considering development that is in the Green Belt. The wording should be revised it is clear that only development that aligns with the purpose of the New Town would constitute very special circumstances.

Whilst the policy is clear the any development should not prejudice the New Town locations, it would be appropriate for the policy to include specific recognition of meanwhile uses being appropriate. Given the timeline associated with the development of New Towns, it could be feasible for temporary development to last ten years or more without prejudicing the delivery of the New Town as a whole. For example, a solar farm could be installed in an area that will eventually be part of the New Town but before that it could be contributing towards meeting the energy demand of the development. This should be entirely acceptable and the policy wording should be revised to make this explicit.

Moreover, it should be for the applicant of another development to demonstrate that it will not have an adverse impact on the delivery of the New Town and the policy should be clear in the respect and require that it is demonstrated in the application that the New Town delivery is not prejudice. This will also enable more piecemeal delivery of the New Town to come forward, which in turn will result in faster delivery overall but ensure that the checks and balances are in place so the overall aims of the New Town are not undermined.

Both the plan making and decision making policy are silent on viability. However, not only is viability crucial to the success of the New Towns programme, it is also far more complex than the viability of development routinely covered in local plan examinations. Bespoke guidance should be published as to how viability should be considered in the allocation of New Towns and also in the determination of applications. Given the complex and costly infrastructure needs, as well as the other policy burdens imposed on these locations which compete with the 40% affordable housing target, Inspectors and local authorities need to be guided as to how to reconcile these viability challenges.

Question 17

Do you think establishing the placemaking principles in the proposed planning policy is an effective way to implement the placemaking ambition of the programme?

(Yes/No/Not sure)

If you answered no, how do you think the placemaking principles should be implemented?

The principles set out in Annex A repeat much of what is included in the draft NPPF or Design and Placemaking PPG so HBF does not consider this annex to be necessary. Instead, the planning policy itself could be bolstered to include requirements those aspects included in the annex to ensure that they are met. The design guidance could be left to the Design and Placemaking PPG.

More detail on the implementation of the design and placemaking objectives of the New Towns could be included in policy, setting out how the design and placemaking quality of the New Towns is to be assessed, for example by a nationally led design review panel, as set out in our response to question 15.

Further guidance around the expectations of stewardship should be published, including the funding and governance of the intended arrangements to ensure the long term success of each of the locations.

Question 18

Do you think the proposed planning policy provides sufficient flexibility to new town locations to meet the placemaking principles?

(Yes/No/Not sure)

If you answered no, what other measures could create a flexible approach to the placemaking principles?

Annex A sets out a series of principles but as highlighted in response to Question 17, much of this is repeated from existing policy and guidance. The focus should be how New Towns will be assessed in meeting these principles.

Question 19

Is establishing a 40% target for affordable housing an effective way of delivering an ambitious number of affordable homes?

(Yes/No/Not sure)

If you answered no, what changes to the target are needed?

The proposed target of 40% affordable housing is a laudable one but the viability of these developments cannot be ignored. The Policy needs to recognise the viability challenges of delivering such large scale development and include mechanisms for testing viability at Plan and application stages.

Question 20

Is the proposed planning policy on giving substantial weight in decision making to the social and economic benefits of new towns clear?

(Yes/No/Not sure)

If you answered no, please provide your reasons.

Question 21

Do you agree with the government's approach to decision making policy on the Green Belt?

(Yes/No/Not sure)

If you answered no, what further change to plan-making or decision-making policy are needed?

As set out in response to Question 16, the policy wording should be made clearer so that it is only development related to the New Town objectives that would constitute very special circumstances and that meanwhile uses that do not prejudice the development of the New Town may also be acceptable.

Question 22

Do you think the proposed planning policy is sufficient for the purposes of safeguarding land for development as new towns.

(Yes/No/Not sure)

If you answered no, how could the policy go further?

The policy should be made clearer that it is for the applicant to demonstrate that the proposal does not prejudice the delivery of the New Town. Moreover, it could be appropriate to use safeguarding directions in areas where there are a number of competing uses. It is currently unclear why Government has not decided to pursue this route.

Question 23

Do you think any additional planning policies are needed to support the delivery of the programme objectives?

(Yes/No/Not sure)

If you answered yes, please provide details.

As set out in response to Question 16, the draft policy is still at a high level and it would benefit from further detail on the principles set out in the Annex and how development proposals will be assessed against them.

Further policy wording should be provided to ensure infrastructure providers plan for and accommodate New Town delivery, creating bespoke infrastructure plans that align with the delivery programme of New Towns to ensure that the delivery is not stalled or fettered by inadequate infrastructure provision.

Question 24

Do you have any views on the potential impacts of the New Towns Draft Programme on people or groups with protected characteristics?

HBF has no comment.

Final question

Question 25

Is there anything else you would like to tell us that you think is relevant to this consultation but has not been covered in previous questions

HBF has no comment.