

Design and Placemaking Team  
Chief Planner Directorate  
Ministry of Housing, Communities and Local Government  
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10 March 2026

Dear Sir/Madam,

**RE: Consultation on draft Design and Placemaking Planning Practice Guidance - Response on behalf of the London Property Alliance**

I am writing on behalf of London Property Alliance, which brings together Westminster Property Association (WPA) and City Property Association (CPA) to represent over 300 real estate companies operating across central London. A full list of members for WPA and CPA are available [here](#) and [here](#). Our membership comprises the area's leading property owners, investors, professional advisors and developers. The Alliance is a not-for-profit membership body and advocacy group: we champion central London's real estate sector as a major driver of economic and social prosperity for London and the UK.

We welcome the opportunity to respond to the consultation on the draft *Design and Placemaking Planning Practice Guidance* (PPG) and support the Government's ambition to make planning policy easier to use, support faster and simpler local plans and provide clearer direction for decision-making. The Alliance views these aims as being critical to supporting development that drives economic growth, which the Government has emphasised in the parallel consultation on the National Planning Policy Framework (NPPF).

However, we have some concerns regarding the length, level of detail and potential application of the draft PPG in decision-making. The Draft Design and Placemaking PPG runs to more than 160 pages and introduces a high level of detail, which sits uneasily with its intended role as overarching national guidance.

We understand that the PPG is intended to be used alongside Policy DP2 and DP3 of the draft NPPF in decision-making. Part 2 of policy DP2 states that "development proposals that are not well designed should be refused, when assessed against this policy and local design policies, guides, codes and masterplans set out in the development plan. Substantial weight should be given to compliance with these policies when assessing the design quality of proposals." Policy DP3 states that "the principles set out in the Design and Placemaking Planning Practice Guidance should be used to inform how this policy is applied in the absence of locally produced design policies, guides, codes or masterplans."

Taken together, these provisions imply that development could be refused where it is considered not to accord with the principles set out in the PPG in areas where local design guidance is absent.

Whilst the Alliance supports the consolidation of national design guidance into a single document aligned with the NPPF, we are concerned that the level of detail within the PPG could inadvertently create grounds for refusing development that the Government is otherwise seeking to support.

In our view, a document intended to operate in the context of Policy DP3 should be more streamlined than currently drafted if it is to support the Government's objective of faster and more decisive planning decisions.

The Alliance's further concern is that much of the guidance appears better suited to more typical town-based urban typologies and may be less applicable to more complex and varied environments such as city centres. In the context of central London, the built environment varies significantly in character, grain, scale and massing, both between and within different areas of the city centre. Highly prescriptive national guidance risks creating inflexibility in decision-making in these more complex urban contexts.

Development that is architecturally distinctive or innovative relative to its immediate surroundings may be entirely appropriate in locations where the townscape is already diverse, such as parts of central London. If detailed national design guidance is applied too rigidly in such environments, it risks constraining the type of development and investment that the Government is seeking to encourage in order to support economic growth.

For these reasons, we suggest that the PPG should:

1. Be as streamlined and concise as possible, in line with the Government's objectives for a clearer and more efficient planning system;
2. Better recognise the diversity of design contexts, including complex city centre environments; and
3. Be clearly framed so that, in decision-making, design guidance is balanced appropriately with other material planning considerations.

We would welcome the opportunity to discuss these representations further with the Department if that would be helpful.

Yours faithfully,



**Charles Begley**  
Chief Executive, London Property Alliance