

# NaCSBA Response to NPPF Consultation

**The planning system is currently constraining one of the few scalable, demand-led sources of housing delivery available to Government.**

## **Executive Summary**

The UK faces a structural undersupply of homes. While Government has increased housing targets, delivery remains constrained by a lack of market diversity and an over-reliance on large volume housebuilders.

Custom and self build offers a proven, market-led route to increase supply, improve quality, and accelerate delivery—without direct public subsidy.

However, as currently drafted, the proposed NPPF changes risk further marginalising individual and small-scale delivery, particularly on micro-sites and in smaller settlements.

We recommend targeted amendments to ensure the NPPF actively enables, rather than inadvertently constrains, this sector.

## **1. The Case for Action**

The UK housing market is not supply-constrained by demand, but by delivery structure.

Large developers continue to manage build-out rates to protect values and margins. Whereas, SME builders, individuals and micro-developers face disproportionate barriers to land and planning. As a result, a significant, demand-led source of housing delivery remains underutilised.

### **Custom and self build:**

- Delivers high-quality, energy-efficient homes
- Aligns with consumer demand for smaller sites and incremental growth
- Can scale delivery significantly if supported by policy (10,000s of homes annually)

A planning framework that enables this sector is essential to achieving Government's housing and growth objectives.

## **2. Strategic Priorities**

NaCSBA priorities across planning policy are:

- (a) Effective implementation of the Right to Build - ensuring statutory duties translate into actual serviced plot delivery.
- (b) Planning reform for small and micro sites - simplifying, de-risking and accelerating consent for individual and SME-led development.
- (c) Mandatory provision on large sites - requiring serviced custom and self build plots on

major developments, with delivery enforced.

### **3. Response to Key NPPF Proposals**

#### **3.1 Plan-Making**

We support strengthened requirements to consider custom and self build in plan-making. However, policy recognition must be matched by enforceable delivery mechanisms. Historic underperformance demonstrates that plan-level support alone is insufficient.

#### **3.2 Decision-Making**

The NPPF should explicitly recognise the Right to Build duty as a material consideration in decision-making. Without this, the statutory duty remains disconnected from planning outcomes.

#### **3.3 Achieving Sustainable Development**

We support the use of digital mapping, but policy intent must shift from containment to optimisation of land supply.

Key concerns:

- The proposed definition of settlements risks excluding hamlets and smaller communities
- This would significantly reduce opportunities for natural infill and edge-of-settlement development It would disproportionately impact individual and custom build delivery

We recommend that policy should explicitly support:

- Proportionate growth across all settlement sizes Infill and “rounding off” development
- Development adjacent to existing buildings where demand exists

#### **3.4 Housing Supply and Site Typologies**

The current proposals fail to adequately recognise micro-sites and individual plots (<1 hectare). This creates three risks:

- Plans will under-allocate such sites Delivery will be under-monitored
- A key source of organic supply will be lost

While support for small and medium sites is welcome, micro-sites remain overlooked and we recommend the introduction of:

- Explicit recognition of micro-sites in policy A flexible allocation approach
- Monitoring frameworks that capture individual plot delivery

#### **3.5 Large Sites and Diversity**

The emphasis on diversity (reflecting the Letwin Review) is positive. However, current proposals do not fully capture the delivery potential of large sites and we recommend:

- Mandate serviced custom and self build plots on large sites Require delivery through planning conditions or obligations
- Introduce flexibility in zoning and phasing to enable build-out diversity

### **3.6 Effective Use of Land**

We support a more permissive approach to development in residential areas. However, current wording does not go far enough to drive meaningful increases in delivery. We recommend that policy is strengthened to explicitly support:

- Residential infill
- Subdivision of plots
- Logical expansion of settlement boundaries

### **4 Conclusion**

The proposed NPPF changes contain positive principles, particularly around diversity and small sites. However, in their current form they risk:

- Further disadvantaging individuals and SMEs Reducing delivery on micro-sites
- Constraining development in smaller settlements

This would undermine housing delivery, reduce consumer choice, and weaken market resilience.

Targeted amendments could unlock a significant, currently underutilised source of housing supply—without public subsidy.

### **5 Summary of Key Recommendations**

- Make the Right to Build duty a material planning consideration
- Explicitly support micro-sites and individual plots in policy and monitoring
- Revise settlement definitions to include hamlets and support proportional growth
- Strengthen policy support for infill and edge-of-settlement development
- Require serviced custom and self build plots on large sites, with delivery mechanisms

**NaCSBA**

**March 2026**