

Changes to the National Planning Policy Framework March 2026



Introduction

A key part of our [strategy](#) at Make Space for Girls is campaigning for changes in national policy. Part of this is lobbying so that national policy provides a supportive structure, enabling local authorities, communities and developers to make sure that when new public spaces are built, they are welcoming to teenage girls.

National planning policy is a vital part of this and below we set out our responses to the Government Consultation on the National Planning Policy Framework for England (NPPF) and the associated Design of Placemaking Planning Practice Guidance. This consultation ran between December 2025 and March 2026.

We limited our responses to those sections of the NPPF in relation to which the charity has a strong, evidence based position, consistent with our charitable aims. We therefore responded to question 148 (Chapter 14: Achieving well-designed places), question 158 (Chapter 16: Promoting healthy communities) and questions 224 and 225 (Public Sector Equality Duty). For the Design and Placemaking Planning Practice Guidance we responded to those sections of the Guidance focussed on the design of public space.

The response portal used by the Government requires each question response to be self-contained and does not allow responders to refer back to previous answers. These means inevitably that there is a level of duplication between answers.

We'd love to hear from you if you agree with the changes we propose: if you do, please contact us at makespaceforgirls@gmail.com with NPPF in the subject line.

Make Space for Girls Policy Team.

March 10 2026

NPPF Chapter 14:

Achieving well-designed places

Here we focussed on Policy DP3.

Policy DP3 sets out seven key principles for well-designed places (paragraphs 1 (b) to (h)). These principles cover all aspects of place design, from liveability and identity to climate change mitigation, movement, nature and the design of public space. These seven principles are elaborated upon in the Design and Placemaking Planning Practice Guidance (see below).

Policy DP3 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.”

DP3 is therefore an important foundation for the design of new parks and similar spaces. In line with our charitable aims, we focussed on that part of DP3 that impacted public space design.

Our response is below:

Question148: Do you agree policy DP3 clearly set out principles for development proposals to respond to their context and create well-designed places?

We partly disagreed for the reasons set out below:

Make Space for Girls is an independent charity that has been campaigning for 5 years to make parks and similar areas of public realm more welcoming to teenage girls.

We are therefore focussed on DP3 1 (g) which currently reads:

“Public Space: include spaces that are safe, secure, inclusive, accessible for all ages and abilities and which facilitate and encourage social interaction, play and healthy lifestyles (for example by providing high quality, clear and legible pedestrian and cycle routes, a variety of recreational spaces and places to meet, and making building entrances and windows face onto streets and other public spaces to provide natural surveillance)”

We fully support the inclusion of references to public spaces being safe, secure, inclusive and accessible.



But we believe that by only referring to “all ages and abilities” this paragraph misses a valuable opportunity to encourage local authorities and developers to consider the impact that gender can have on the use of public spaces and how good design can mitigate disadvantage.

As an increasing number of experts involved in planning are aware, there is now a compelling body of evidence that many women and girls experience public spaces differently to many men and boys.



As recognised in the Government’s VAWG strategy:

“...thoughtful urban design can deter violence, reduce opportunities for harm, and send a clear message that public spaces belong to everyone. By embedding considerations of VAWG into planning and transport guidance, we can ensure that safety is built into the fabric of our communities, making public spaces welcoming and secure for all. ”

[Freedom from Violence and Abuse: a cross-government strategy to build a safer society for women and girls Volume 1, p65].

We also support the action point identified in Volume 2 para 31 (b) of the Government’s VAWG Strategy, that the national design guidance will be updated

“to reflect a VAWG perspective, ensuring that safety considerations inform how public spaces are designed. ”

We believe that the inclusion of a reference to gender, in addition to the references to age and ability, within DP 3 1 (g) would create the necessary impetus for developers and local authorities to be part of the holistic, whole society approach to creating a safer public realm for all. Make Space for Girls has worked with a number of developers from the large to the relatively small and we have found that they are consistently interested in ensuring that residential developments work well for the women and girls who will make their lives within these developments.

Including a reference to “gender” within DP 3 1 (g) will provide those developers with the confirmation that such interest is seen by the Government as more than legitimate;

- it is seen as something that is part of the comprehensive suite of national policies which will apply across the country; and
- that an approach that recognises the importance of men and women, boys and girls, in the design of public space is not something that should be deviated upon within locally produced plans.

The change that we are seeking would not require a material rewrite or reordering of any part of DP3, but could be achieved simply by the addition of the word "genders" after the word "ages" in the opening line, so that that DP3 1 (g) reads as follows:

“Public Space: include spaces that are safe, secure, inclusive, accessible for all ages, genders and abilities and which facilitate and encourage social interaction, play and healthy lifestyles (for example by providing high quality, clear and legible pedestrian and cycle routes, a variety of recreational spaces and places to meet, and making building entrances and windows face onto streets and other public spaces to provide natural surveillance)”

NPPF Chapter 16:

Promoting healthy communities

Chapter 16 of NPPF is concerned with how the planning framework can promote the creation of healthy and inclusive places, by enabling development which can support this aim and seeking to retain, improve and deliver new facilities which are important for community wellbeing and minimising inequalities.

At Make Space for Girls, we know from our research, including talking to over 500 teenage girls, young women and gender diverse young people, that public realm design often fails to promote their wellbeing in the community. We also know that the national standards referenced in this section of NPPF do not minimise the inequalities that teenage girls, young women and gender diverse young people face, at least in part because these national standards simply don't acknowledge that this inequality exists.

Make Space for Girls believes that it is essential that the national standards referenced in the NPPF acknowledge the current gender segregation we see in our teen spaces and the gender inequality that this creates as a barrier to healthy communities.

Our response is below:

Question 158: *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?*

We partly disagreed for the reasons set out below:

The stated intention behind policy HC1 is set out in the Consultation as follows:

"The intention is to make the expected level of provision for these facilities explicit, given their vital role in supporting health and wellbeing, improving quality of life, and ensuring appropriate contributions from development are secured."

We fully support this intention. The difficulty arises because the relevant national standards and best practice referred to in the foot notes to the policy (footnotes 58 and 59) do not reflect the importance of play. Play for all children including teenagers is an essential component of good physical and mental health.

For example, one of the national standards referenced in footnotes 58 and 59 is: Assessing Needs and Playing Pitch Strategy guidance | Sport England. The national standard is entitled

"Assessing needs and opportunities guide for indoor and outdoor sports facilities. How to undertake and apply needs assessments for sports facilities."

Further the national standard in its introduction states:

"The approach set out in the guide has been developed so that it can be tailored to a range of sports facilities. However, it is important to note that the guide focuses on the needs for formal sport and recreation activities and the sports facilities required to meet these needs. The Guide is not intended to be used for assessing play, informal activities and wider open space needs."

This national guidance is focussed exclusively on sport. As the standard itself states: it is not intended to be used for assessing play, informal activities and wider open space needs.

The Fields in Trust standards also have a significant emphasis on sports facilities. But these standards do, at least, refer to play areas. However in terms of informal play provision for older children, the FIT Guidelines emphasise skate parks and MUGAs as the “right” solution for teenage informal play. This is problematic when it comes to supporting the health and wellbeing of the majority of teenage girls and many teenage boys.

This is because research shows that MUGAs and skateparks are dominated by boys and young men:

- 92% of the teen users of MUGAs are boys and young men;
- as are 84% of the teen users of skateparks.

This domination means that the girls are not using these facilities; it also means that the wider park feels unwelcoming to teenage girls.

Yorkshire Sport and Women in Sport Make Space for Us looked at this issue in depth in 2022 and their report and recommendations are available in their report: Make Space for Us - Women in Sport 2022.

Make Space for Girls have conducted workshops with over 500 teenage girls and gender diverse young people, many of whom have been very sporty and the following quotes are very typical:

“My female friends and I constantly struggle to find places where we can relax and have peace... Boys have skateparks – although they are technically open to everyone, they are predominantly used by boys, and when girls use them, they often face unwanted attention [...] When they put in skate parks and fence pitches they think all young adults are the same” - teenage girl, Clapham

“Every time I have tried an outdoor gym I can’t even reach! [...] It seems designed for men who do pull ups...” teenage girls Brent

“A big fat football pitch is a way of designing girls out of public spaces.”- teenage girl, Barking.

We would therefore request that in addition to the Sport England and FIT standards, footnotes 58 and 59 of HC1 should refer to the recommendations of Women in Sport and Yorkshire Sport report in: Make Space for Us -2022.

This report can be accessed at the following web address: <https://www.yorkshiresport.org/whats-new/news/make-space-for-us>



NPPF: Public Sector Equality Duty

The Public Sector Equality Duty (PSED) is a series of legal obligations that public bodies (including local authorities) must comply with when they make decisions. The PSED is made up of a general duty (set out in section 149 Equality Act 2010 and applying equally in England, Wales and Scotland) and a number of specific duties (set out in regulations and which differ for England, Wales and Scotland). More information about the PSED is at [Make Space for Girls Q&A on the Public Sector Equality Duty](#) and you can read our blog by Philip Robson, barrister at Kings Chamber here [The Public Sector Equality Duty... a planning barrister's view](#)

In summary, the PSED requires local authorities, when exercising their powers in relation to planning and development, to consider proactively the need to:

- eliminate unlawful discrimination, harassment, victimisation and other unlawful discrimination;
- advance equality of opportunity between people who share a protected characteristic and those who do not; this involves removing/reducing disadvantage, meeting differing needs, and encouraging people to participate in activities where their participation is low; and
- foster good relations between people who share a protected characteristic and those who do not.

We know from the data that, when it comes to parks and similar public spaces, teenage girls are disadvantaged when compared to their male peers. Which means that local authorities need to proactively consider reducing this disadvantage when creating their local plans and considering development proposals.

This is why Make for Girls **responded to these questions as set out below:**

224: 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? Yes a) If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how.

We believe that the revision of the NPPF provides an opportunity to address the current disadvantage suffered by teenage girls and young women, when compared to their male peers, when using public space. There is clear evidence that default/standard teen play facilities (skateparks, MUGAs, BMX tracks) provided in the public realm are dominated by boys and young men and/or there is low participation in the park by teenage girls and young women.

For example Make Space for Girls research report "Parkwatch" 2023 showed that 92% of the teen users of Multi Use Games Areas were boys and young men; as were 84% of the teen users of skateparks. This report can be accessed via the following address: <https://www.makespaceforgirls.co.uk/parkwatch> This means that girls are disadvantaged by the continued provision of these facilities, activated in their current manner. As a result, the PSED requires planning authorities to have due regard to the need to reduce this disadvantage when considering aspects of planning applications that cover parks and similar green spaces.

225: Is there anything that could be done to mitigate any impact identified? a) Please explain your answer:

We believe that

1. A change to DP3 1 (g) to include the word gender as follows: Public Space: include spaces that are safe, secure, inclusive, accessible for all ages, genders and abilities and which facilitate and encourage social interaction, play and healthy lifestyles (for example by providing high quality, clear and legible pedestrian and cycle routes, a variety of recreational spaces and places to meet, and making building entrances and windows face onto streets and other public spaces to provide natural surveillance); and

2. A reference to the report by Make Space for Us by Women in Sport and Yorkshire Sport 2022 in the footnote 58 and 59 Chapter 16, policy would assist in mitigating this impact.

Response to Design and Placemaking Planning Practice Guidance Public Consultation

The Design Guidance sits below the NPPF and is intended to replace the National Model Design Code. Its purpose is to offer practical advice on creating high-quality places and buildings, aiming to outline and illustrate the Government's design priorities. It expands and advises on the Seven Principles of Good Design identified in DP3 of NPPF (see above).

In line with the charity's aims, Make Space for Girls focussed on the sections of the Design Guidance that considers public space (as opposed to, for example, building design). **Our response is below:**

Question 9: What additional considerations or clarifications might be necessary to ensure planning practice guidance supports inclusive and culturally appropriate design and placemaking?

Make Space for Girls is an independent charity that has been campaigning for 5 years to make parks and similar areas of public realm more welcoming to teenage girls.

We are therefore focussed Para 151, which is drafted as follows:

Para 151: Insecure places disproportionately affect marginalised groups. In devising and implementing design principles, local authorities must comply with the public sector equality duty under the Equality Act 2010 and in doing so must have due regard to the need to: eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act; advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

We support the greater explanation of the ambit of the public sector equality duty (PSED) by this paragraph, when compared, for example to para 145 of the existing National Model Design Code Part 2.

However we would suggest that introducing the importance of the PSED with the sentence **"Insecure places disproportionately affect marginalised groups."** runs the risk of users of the Guidance being led to understand that the PSED is only relevant to the consideration of insecure places and/or marginalised groups, which is not the case.

The PSED should be a relevant consideration in all aspects of designing public spaces. For example, women are more likely to be navigating streets with a child in a buggy: they are therefore more likely than men to be disadvantaged by stepped access. The PSED requires local authorities to have due regard to eliminate disadvantages suffered by people who share a protected characteristic when compared to individuals who do not, and this requirement applies when the authority is considering all places, whether or not they might be considered "insecure places".

Another example, in Make Space for Girls sphere of work, relates to the domination of outdoor skateparks and fenced pitches by boys and young men.

We know that 92% of the teen users of fenced pitches are boys and young men, as are 84% of the teen users of outdoor skate parks. Research done by Yorkshire Sport and Women in Sport in 2022 showed that 59% of teenage girls feel unwelcome in parks because they are dominated by boys.

As a result, teenage girls are disadvantaged in parks when compared to their male peers and the PSED requires local authorities to have due regard to reducing this disadvantage.

We would suggest that the content of paragraph 151 would be more effective in supporting planners, councillors and developers to implement the PSED were it to be a standalone paragraph (without the reference to insecure places) near the beginning of P1- perhaps as a new paragraph 145, with current para 145 becoming 146 etc.

We would also like to comment more generally on the paragraphs in the Guidance appearing under the heading: P4 Make sure public spaces support social interaction; and in particular paragraph 156:

While younger boys and girls (eg up to the age of 10 or 12) appear to use play spaces in equal numbers, once children become teenagers and need places to take part in teenage play, without adult supervision, a clear gender split opens up with teenage boys and young men dominating the spaces that are designed as spaces for teenage play, and teenage girls and young women are generally excluded.

The data clearly demonstrates this: A nationwide survey in 2023, involving 265 assessments, reporting on 1858 teenagers including 117 counts on 87 different fenced pitches, and 100 counts on 81 different skate parks showed that 92% of the teen users of fenced pitches are boys and young men, as are 84% of the outdoor skate parks.

This research can be found at www.makespaceforgirls.co.uk/parkwatch

A separate piece of research in Yorkshire, carried out by Yorkshire Sport and Women in Sport in 2022 indicated that 59% of teenage girls feel unwelcome in parks because they are dominated by boys. This research can be found at: <https://www.makespaceforgirls.co.uk/resources/make-space-for-us>



This exclusion has serious implications for teenage girls and young women: it impacts their activity levels, physical and mental health; and their sense of belonging in their local communities. It erodes their belief that they have as much right to be present in public space as their male counterparts. This matters: a teenage girl who has learned that she is entitled to be, and feel welcome, in the public realm stands a greater chance of becoming a woman who feels the same.

From our research at Make Space Girls, it is clear that no one set out to exclude teenage girls and young women from parks, fenced pitches or skateparks. And for many this exclusion is hidden in plain sight: we are so used to this gendered use of teen provision in parks that we do not see it. But the data shows us that this exclusion is happening across the country.

The reasons why it happens are complex and societal as well as spatial. But as part of the Public Sector Equality Duty, planners should, in creating policy, have due regard to the need to reduce the disadvantage that the teenage girls and young women suffer in this respect.

We believe that the Design and Placemaking Planning Practice Guidance provides an opportunity to engage planners and developers with this important area of exclusion.

This could be done without significant rewriting of the Guidance by adjusting paragraph 156 to read

156. *Well-designed public spaces are social hubs, providing meeting places, comfort, relaxation and stimulation for all, regardless of the type or tenure of surrounding homes and buildings. They help reduce social isolation and loneliness (see Liveability) and increase a sense of community and belonging by accommodating diverse needs, including those who are frequently excluded from public space by its design, for example older people, teenage girls and gender diverse young people, disabled people and people who are neurodivergent*