

Equity response – Proposed reforms to the National Planning Policy Framework and other changes to the planning system – Ministry of Housing, Communities and Local Government

March 2026

About

1. Equity is the largest creative industries trade union with 50,000 members united in the fight for fair terms and conditions across the performing arts and entertainment. Our members are actors, singers, dancers, designers, directors, models, stage managers, stunt performers, choreographers, circus performers, puppeteers, comedians, voice artists, supporting artists and variety performers. They work on stage, on TV and film sets, on the catwalk, in film studios, in recording studios, in night clubs and in circus tents.

Contact

2. For more information about this submission, please contact Amelia Pratt, Policy & Public Affairs Assistant, apratt@equity.org.uk

Our response

3. Equity welcomes the opportunity to give evidence on the development of a new National Planning Policy Framework (NPPF). This submission relates to questions 162 and 168 of the consultation.

HC6: Retention of key community facilities and public service infrastructure

162.	Do you agree with the proposed approach to retaining key community facilities and public service infrastructure in policy HC6? a) Please provide your reasons, particularly if you disagree
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Strongly disagree

4. Equity strongly disagrees with the proposed approach in policy HC6 in its current form. As currently written, the approach presents risks that cultural venues will be overlooked in planning application processes and is inadequate for the purpose of protecting a wide range of cultural venues.
5. The definition of 'key community facilities' in HC6 currently excludes mention of cultural venues. While it may be possible to argue that the policy can be interpreted as covering cultural venues, a lack of explicit mention introduces unnecessary ambiguity which opens planning applications up to a level of challenge that risks slowing planning processes significantly.
6. The omission also introduces inconsistency in the NPPF. The definition of 'Key community facilities and public service infrastructure' in HC6 does not align with the definitions presented in the glossary. For the NPPF to be consistently interpreted and applied, these definitions should be updated to reflect one another.

7. Equity urges the department to rectify this and ensure that cultural venues are included in the list of key community facilities afforded protections under HC6 in order to avoid unnecessary risk. We propose that the updated HC6 definition should read:

For the purpose of this policy, key community facilities and public service infrastructure means established services that are used on a frequent basis in a local area such as local shops, public houses, places of worship, cultural venues, local health facilities and community halls.

8. Policy HC6 only applies when the facility would be the last of its type in the area concerned. Equity strongly opposes this element of the policy, which presents a significant threat to a wide variety of venues, including theatres and cultural spaces.
9. As highlighted by the Theatres Trust, this provision represents a departure from current practice in local plans, which almost all seek to protect all facilities where there remains need and demand, and in the existing NPPF which seeks to “guard against unnecessary loss”¹
10. In the case of theatres and cultural spaces, applying HC6 only when a venue is the last of its type is incompatible with the varied nature of such venues. For example, while there may be several venues in a local area that all come under the typology of ‘theatre’ they may serve completely different purposes and benefit different members of the community. For example, a traditional theatre venue which puts on professional touring and large-scale productions does not serve the same purpose as a small, non-traditional venue which provides a stage for grassroots, independent acts, but both provide significant value to the community.
11. Both types of venue have significant value to local communities. We know that for every £1 spent on a theatre ticket, an additional £1.40 is spent in surrounding businesses, generating £1.94 billion in added value to local economies each year.² We also know that small venues play a crucial role in supporting the creative pipeline which can see a small-scale production grow to national and international success. For example, Punchdrunk, an award-winning immersive theatre company, had their early work supported by smaller, non-traditional venues including Bethnal Green Working Men’s Club (BGWMC) and have gone on to own their own venues and enjoy national and international success.
12. In addition to economic returns, having a range of theatre and cultural spaces in a local area provides a platform for a diverse range of creatives workers such as drag artists, comedians, singers and others who make their careers in small and non-traditional cultural spaces. Often, these venues are at the forefront of supporting work that might not

¹ Theatres Trust, *Theatres Trust’s response to National Planning Policy Framework: proposed reforms and other changes to the planning system*, 2026

² [SOLUUKT-State-Of-British-Theatre.pdf](#), May 2025, p. 16.

be platformed by larger or more traditional theatres, with venues such as BGWMC supporting LGBTQ+ acts and giving a platform and space for people from marginalised backgrounds to perform and see acts.

13. Despite this, the Music Venue Trust report that 30 small venues permanently closed between 2024 and 2025, following the previous year where 78 small venues closed or ceased operation.³ Additionally, Theatres Trust currently list 43 theatres on their Theatres at Risk register⁴ and SOLT/UK Theatre highlight that nearly 40% of theatres risk closure or falling into an unusable state.⁵ The NPPF must be strengthened to offer these venues explicit protection in the planning system in order to avoid exacerbating the pressures on these venues.
14. Under the current proposals, a venue such as BGWMC and a traditional venue in the same area could be treated as the same type of venue, therefore, not the last of their kind and so would not benefit from the protections afforded by HC6. We urge the department to remove the condition that a venue must be the last of its kind in order to benefit from these protections.
15. It is worth noting that, unless amended accordingly, the current NPPF proposal in tandem with MHCLG's recently consulted proposal to remove statutory consultee status from Theatres Trust creates a significant increase in precarity for cultural venues across the country, undermining the government's efforts to put money into capital redevelopment projects in the culture sector by ripping away crucial protections that such venues rely on for protection.
16. Our full suggested amendments to policy HC6 are as follow:

HC6: Retention of key community facilities and public service infrastructure

1. Development proposals should not result in the loss of key community facilities and public service infrastructure serving a local area unless:

- a. It can be demonstrated that there is no reasonable prospect of the facility being retained, due to there being insufficient community support for the service it provides, or it no longer being viable (in the case of shops and public houses where viability is an issue, evidence should be provided that reasonable steps have been taken to market the property for its existing use without success, for a period of at least twelve months); or

³ [Music Venue Trust, Annual Report 2025, 2025](#), p.12

⁴ [Theatres Trust, 'Theatres at Risk Register 2025'](#)

⁵ [SOLT/UK Theatre, The State of British Theatre in 2025: Growth, Risk and the Urgent Need for Public Investment, 2025](#), p.24

b. The loss resulting from the proposed development would be replaced by equivalent or better provision, in a location which offers comparable or improved accessibility for the community it serves.

2. For the purpose of this policy, key community facilities and public service infrastructure means established services that are used on a frequent basis in a local area such as local shops, public houses, places of worship, cultural venues, local health facilities and community halls.

P4: Impact of development on existing activities

168.	Do you agree that policy P4 makes sufficiently clear how decision-makers should apply the agent of change principle? a) Please provide your reasons, particularly if you disagree
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Strongly agree

17. Equity welcomes the strengthening of the agent of change principle encompassed in policy P4. The policy is clear and places the onus of mitigation on those seeking to make changes to the existing environment.

18. In order to strengthen policy P4, we support the recommendations from Theatres Trust that the department includes explicit mention of theatres and cultural spaces in the list of existing business, community and public service activities and infrastructure that P4 applies to, reading as follows:

‘Existing businesses, community facilities, public services and defence and security activities should not have unreasonable restrictions placed on their current or permitted operation as a result of development being approved after they were established. This means that development proposals should be capable of being integrated effectively with existing business, community and public service activities and infrastructure in their vicinity (including, but not limited to, uses such as pubs, music venues, theatres and cultural spaces, places of worship, sports clubs, blue light services, defence, electricity network infrastructure and industrial and waste sites).’

19. It is important to note that this positive step is at risk of being undermined if the department does not amend the definitions and provisions of policy HC6 as recommended. It is also worth noting that proposals to remove Theatres Trust from the statutory consultee system further risks undermining this progress, through removing valuable, specialist expertise which supports the viability of development in cohesion with the requirements of valuable existing venues. Equity has submitted evidence on these proposals elsewhere.