PLACEMAKING - DESIGNING HOMES AND NEIGHBOURHOODS FOR THE FUTURE **26.9.2024**

The new Government is committed to building a significant number of new homes for the future. This paper focuses on one aspect of this ambition: how to ensure that these new homes and neighbourhoods are ***designed*** well. Many in the recent past have not been.

Why design is important. There are at least four reasons:

An attractive built environment. This includes the design and build quality of homes and community buildings, the layout of neighbourhoods and streets ('streetscape'), landscaping and trees, and access arrangements for pedestrians, cyclists and motor vehicles.

Placemaking. Design is also fundamental to *placemaking.* Design has an important role to play in creating quality places that people want to live in, characterised by a thriving community, community assets and activities, green spaces and access to nature, and good public services.

Sustainability and climate change. Design has a key role to play in creating places that do not rely on high levels of car ownership and energy consumption**.** There is now substantial experience of net zero carbon design. As these designs are built at scale, unit costs will come down. Designing places with low energy use also contributes to national energy security.

Affordability. Designing places which don't rely on car ownership and with homes that have very low energy bills make a significant difference to the budgets of people living on low incomes.

Design guidance covers these issues in detail. The problem is not primarily with the guidance

In this paper, we are interested in (a) how this guidance is used by architects, developers, planners and local councillors and (b) how we ensure it adds value to the design, planning and construction of developments.

Our focus, therefore, is the application of design guidance to the *operation* of development through the planning system. Unless this process is improved, we will not create attractive, successful neighbourhoods.

This issue does not receive much attention in the NPPF. We discuss it below, after our recommendations.

Recommendations

Drawing on the reports cited below and our own experience of working with planning officers and communities on local and neighbourhood planning, we make eight recommendations.

1.**National design value standards**. Housing and neighbourhood design principles should be embedded in the new National Planning Policy Framework (NPPF) through 'design value standards' that place the value of design at the heart of planning and housebuilding. The *Manual for Streets* should also be updated and adopted.

2.**Local design codes** Local authorities need to move away from generalised authority-wide design codes and use local design codes for each character area and major site. Design reviews should be required of all major housing schemes. Local authorities also need to end the current disconnect between **highways design** and planning, especially for new housing. Closer links are also needed with utilities such as water, energy and digital.

3. Local planning applications. The NPPF should require applications for new housing developments to show that they have taken full account of national design standards and the local authority's policies and guidance covering design and quality, placemaking, sustainability, neighbourhood layout, streetscape, landscaping and access for pedestrians, cyclists and motor vehicles.

4.**Local Design Reviews (LDRs)** . It is recognised that Local Design Reviews, together with Local Design Codes, are the most effective ways to raise design standards. Local authorities should therefore set up a Design Review Panel incorporating members of the planning committee and, importantly, co-opted members with specialist expertise, to review the design proposals for all major applications. This could take the form of a simple audit (see below) *. If design guidance has been followed, this should not cause delays.

5. Local Plans. Design guidance should be a part of the Local Development Plan and a material consideration in the decision-making process. This is required to strengthen the statutory guidance for applicants to demonstrate they have taken account of it.

6. **Local Planning Authorities:** Local Planning Authorities need access to sufficient planners with design expertise. The NPPF should explicitly require design-related issues to be resolved in the determination of a planning application and not be deferred to be dealt with through conditions. Their powers should be reviewed, especially regarding enforcing planning conditions on landscaping, biodiversity and climate change.

7. The Planning Inspectorate. The planning appeals process can deter LPAs from objecting to applications with poor quality design because of the potential cost implications if they lose. It is important therefore that Planning Authorities are confident that the Inspectorate will take due account of NPPF design guidance.

8. Collaboration. The NPPF should encourage collaboration between developers, house builders, planning officers, design experts and community leaders at the start of a significant development and at regular points throughout the construction period. This can increase the likelihood of resolving problems swiftly and ensuring a successful outcome.

***Design audit.** One proposal worth considering is to carry out a simple design audit for developments over 10 homes. The applications could be scored using an alphabetical or numerical scale representing 'very good' to 'very poor'. This assessment would be based on design criteria set out in the final version of the NPPF and carried out by the Local Planning Authority's Design Review Panel or an independent third party.

Low scores would result in the application being refused until design concerns were rectified. If the application is approved, this score should be included in any future promotional material, in the same way as an Energy Performance Certificate (EPC).

This should not lead to additional delay or cost. The additional exercise of assessing their designs against an audit tool will be simple as developers will be considering their designs for each site anyway. The cost of ensuring good design is minimal compared to the material and labour costs of the development. Furthermore, a good design score will help sales.

The evidence for poor design of housing and neighbourhoods

In the past, the quality of new housing developments has been decidedly mixed. Sometimes, they have been well and sensitively designed. Too often they have not. Sprawling, unimaginative developments can be found in most towns and cities. We need to do better. Planning authorities, developers and housebuilders must ensure neighbourhoods are designed to a higher standard and are a better fit with existing settlements.

Failure to do this is one of the reasons why new housing developments are often resisted.

This not the place for an exhaustive account of this topic. Instead, we will summarise two reports. First, a 2023 national audit by the Bartlett School of Planning (University College London), co-funded by the Place-Alliance and the Countryside Charity. The second is a 2020 report by the UK Collaborative Centre for Housing Evidence (CaCHE), led by the University of Glasgow and supported by the Royal Town Planning Institute (RTPI) and all four UK Governments.

1.Bartlett School of Planning's national audit ('*A housing design audit for England*' 2023) https://www.urban-design.uk/research/a-housing-design-audit-for-england concluded that the design of new housing developments in England is overwhelmingly 'mediocre' or 'poor', with less-affluent communities the worst affected.

The audit reveals that 75% of new housing development studied should not have gone ahead due to 'mediocre' or 'poor' design. The audit inspected over 140 housing developments built since 2007 and found that one in five of these developments should have been refused planning permission outright as their poor design was contrary to advice given in the NPPF. A further 54% should not have been granted permission without significant improvements to their design having been made first.

The audit also found that:

- Less affluent communities are ten times more likely to get worse design, even though better design is affordable.

- Low-scoring housing developments scored especially badly in terms of character and sense of place, with architecture that does not respond to the context in which it is located.

- The worst reported aspects of design include developments dominated by access roads and the poor integration of storage, bins and car parking, leading to unattractive and unfriendly environments with likely negative health and social implications.

- Some gains have been made - schemes scored relatively highly for safety and security and were also typically successful at integrating a variety of sizes of houses.

Professor Matthew Carmona of the Bartlett School of Planning said: "Research has consistently shown that high quality design makes new residential developments more acceptable to local communities and delivers huge social, economic and environmental value to all, yet we are still failing in this regard across England.

"Planning authorities are under pressure to deliver new homes and are therefore prioritising numbers in the short-term over the long-term negative impacts of bad design. At the same time, house builders have little incentive to improve when their designs continue to pass through the planning system. Some highways departments, meanwhile, do not even recognise their role in creating a sense of place for communities.

"Collectively, house builders, planning authorities and highways departments need to significantly raise their game. This can't come soon enough".

The audit recommends designing at higher densities than is the norm to avoid housing sprawl, as more compact developments tend to be designed more sensitively. And housebuilders need to drive greater ambition across the sector to promote design that reflects best practice set out in national and local guidance.

The audit argues that local authorities need to use proactive design codes – design parameters established for each site – and design review processes for all major housing schemes. Local authorities also need to end the current disconnect between highways design and planning aspirations when it comes to new housing areas.

Schemes which do not meet minimum requirements should be refused on design grounds.

2. UK Collaborative Centre for Housing Evidence (CaCHE), led by the University of Glasgow
"Delivering Design Value: the housing design quality conundrum" 2020.
This study was supported by the Royal Town Planning Institute (RTPI) and all four UK governments. James White, lead author of the report, examines what can be done about the 'housing design quality conundrum', summarised here: https://www.rtpi.org.uk/blog/2020/december/the-housing-design-quality-conundrum-what-can-be-done-about-it/ .

He notes that well-designed homes and neighbourhoods have a positive impact on health, strengthen economic development, and support environmental sustainability. National planning policies in the UK all point to the value of creating new homes and neighbourhoods that have an enduring sense of place and support a mix of land uses, provide an equitable range of housing choices, and encourage more healthy and sustainable lifestyles.

Planners face the challenge of realising these design ambitions, while also achieving other planning outcomes, including meeting housing supply targets and ensuring that proposals for new housing are approved expeditiously. This difficult balancing act means that design considerations are often trumped by the need to build more homes, causing design quality to be sacrificed.

CaCHE aimed to identify the barriers that routinely prevent delivery of well-designed homes and neighbourhoods, and pinpoint where the critical points of design intervention lie in the planning and development process. To understand what happens *on the ground* during a typical housing development process, developments in 5 local authorities – one each in Scotland, Wales and Northern Ireland and two in England - were examined.

Delivering design value notes that planners are often passionate about creating well-designed places yet struggle to challenge the *status quo*. National and local design policy is frequently overlooked because other objectives take precedence over design. This is in part due to underfunding in local authority planning departments, where efforts to make design-

sensitive planning decisions are often thwarted by a lack of design skills and training. This problem is frequently made worse by 'siloed decision-making,' which can result in conflicting design advice being offered to house builders and their agents.

The challenges faced by local authority planners are not the only barriers to creating well-designed homes and neighbourhoods, however. A key finding was that the responsibility for design quality is shared between planners and developers. It is widely known that volume house builders, who dominate the marketplace for new homes and have a razor-sharp focus on profitability, use tried and tested site layouts and house types that lack design value. Researchers found that volume house builders are particularly resistant to making design investments in areas where land values are low – a problem compounded by the fact that local authorities in these areas often feel compelled to approve poorly designed housing, fearing that house builders will simply choose to develop elsewhere.

The report's main recommendation is that housing and neighbourhood design principles should be regulated by the four UK governments. 'Design value standards' should be set out that embed the value of design at the heart of planning and housebuilding. Design value standards could mirror the status of building standards, but they should also be simple, concise and readily translatable into detailed design policies and guidance that support local authority planners to champion creativity and diversity.

Without this type of fundamental change, the housebuilding industry will continue to receive a 'free pass' on design and the limited power that local authorities have to shape well-designed places will be eroded further.

Design guidance for new housing developments

There is no shortage of guidance on how to design new housing developments. Its aim is to ensure these developments are planned and delivered to high design standards. This is achieved by describing 'what good looks like' and illustrating these principles of good design with examples from real places. This is an invaluable resource for those responsible for master planning, designing and then building new developments. Let's look briefly at what is currently available.

The Government set up an independent Commission – Building Better, Building Beautiful – which reported in 2020. Its report is here Living with beauty . Government published its response to the Living with Beauty report in 2021.

There is national design guidance for new housing developments and the preparation of local design codes - see for example:

https://assets.publishing.service.gov.uk/media/611152f98fa8f506ca458925/NMDC_Part_1_The_Coding_Process.pdf

Design policies are also set out in Local Plans and in local authorities' design guides. For example, Oxfordshire County Council's Street Design Guide (2023) can be found via this link https://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transport-policies-and-plans/DesignGuidePublication.pdf.

And design policies / Codes are often included in Neighbourhood Plans.

Proposed amendments to the new National Planning Policy Framework (NPPF) are currently out for consultation. Chapter 12 covers design here and we agree with most of it.
The problem is not a *lack of guidance.*

What is the problem?

The first problem concerns the inconsistency of design guidance. Mathew Carmona, an author of the Bartlett study summarised above, argues in his blog on 5.8.2024 that there is an inconsistency between how design considerations are expressed in national policy and how they are expressed in the guidance that accompanies it (To beauty, or not to beauty, that is the question).

The NPPF notes that *"There is already a clear framework through policy and guidance on how to achieve well-designed places (as set out in the National Design Guide and National Model Design Code – NMDC), to enable this to be decided by local planning authorities*. This is based on ten characteristics of well-designed places: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources, and lifespan.

The NPPF itself, however, has a different list of six considerations focusing on: function, attractiveness, character, sense of place, optimising potential, and health and well-being, with a range of other design criteria scattered randomly throughout the NPPF, for example relating to trees, habitats, density and height.

This duplication of design criteria is inconsistent and confusing and makes it difficult to know if developers have or haven't followed the guidance.

The second problem concerns how design guidance is applied to the *operation* of development through the planning system. More specifically, there is the lack of *capacity* and *powers* within Local Planning Authorities to review the design of applications for large developments and then set and enforce planning conditions.

There are four aspects to this second problem:

Developers and housebuilders. Developers and housebuilders are often reluctant to reflect design guidance in their planning applications and tend to rely on a small number of site layouts and building types that are used universally, regardless of context.

Local Planning Authorities - capacity. LPAs frequently fail to check that applications comply with design guidance and to require changes when they don't. This is not because they don't want to see attractive developments. It is more often because they do not have enough planning officers with design expertise or because they are preoccupied with 'getting homes built' above all other considerations.

Local Planning Authorities - powers. Third, LPAs do not have the powers to insist on the delivery of some planning conditions, especially those dealing with landscaping and biodiversity. There are no penalties for non-delivery and LPAs do not have the funds or staff to take developers to court. Furthermore, there is a lack of alignment between highways and planning authorities which makes it difficult for LPAs to avoid streetscapes that 'bake in' car dependency. This makes 'affordable' housing rather less so if residents must buy cars.

Planning Appeals process. The appeals process can sometimes make it difficult for LPAs to make objections about poor design quality design stick. LPAs are vulnerable to losing appeals – they can't risk losing too many and they may be liable for compensation payments if their reasons for refusal are not upheld by the Planning Inspectorate.

Conclusion

The new NPPF promises an additional 300 planning officers. This is to be welcomed.

The new NPPF also notes that '*Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design*.' (Para 136, Page 43).

But our recommendations above will need to be addressed before Local Planning Authorities can do this confidently.

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