

design quality – have we reached a moment of national change?



We have reached a moment of potential national change in the relationship between design, planning and development in England following the government's set of four announcements/documents at the end of January:

- the announcement of a new Office for Place;¹
- proposed new text for the National Planning Policy Framework (NPPF),² intended to strengthen national policy on design quality in the built environment;
- a National Model Design Code³ sitting alongside and extending the National Design Guide; and
- the government's response⁴ to the report of the Building Better, Building Beautiful Commission.

Taken together these initiatives would seem to signal that the writing is on the wall for the practices of mediocre and poor design that have characterised so much new development in the UK for so long. So, is this a moment of sea-change? The answer, of course, will not be found in the announcements themselves but instead in how their aims are delivered. Here, however, we have some key building blocks to that end.

An Office for Place

The announcement of an Office for Place is very welcome, and in effect delivers on the Design Quality Unit that the Place Alliance and others have been advocating.⁵ Few details are given about how it will operate, what it will do, or (crucially) what its budget will be, but immediately setting up an interim Office for Place within the Ministry of Housing, Communities and Local Government, chaired by Nicholas Boys Smith, gives a signal that this will be central to delivering on the design quality agenda and that some urgency is required.

As the Building Better, Building Beautiful Commission said, this should not be about dictating

from 'on high'. Instead, it should be about harnessing the skills that already exist around the country to empower local government and willing developers to build their own capacity and work alongside local communities to shape the sustainable and well loved places of tomorrow. To do so, the new body will need to be close enough to government to influence its decision-making, but far enough removed to maintain an independent spirit and voice that is not afraid to criticise (government, local government and development interests) when necessary, and give praise when praise is due. Moving out of the Ministry to an arm's-length position at an early opportunity is a must.

An end to 'mediocre is good enough'

The proposed changes to the NPPF will undoubtedly assist the Office for Place. While the NPPF already emphasises the importance of design quality, the proposed revisions put this beyond doubt. The accompanying press release makes great play of the use of the word 'beauty' in the NPPF, suggesting this is the first time it has been 'included in planning rules' since 1947. This is not strictly true, but whereas previously the word had been reserved for the countryside or local green spaces (even in the NPPF), now it is applied to the built environment alongside the usual synonyms – quality, well designed, character, distinctive, attractive, etc.

Far more significant is what the same press release trumpets as an expectation that good quality design will be approved while poor quality will be rejected. Here the changes are subtle, with wording moving from:

'Permission should be refused for development of poor design ...'

to:

'Development that is not well designed should be refused ...'

While these sorts of tweaks have a long history,⁶ this one is more significant. In effect it suggests that not only should 'poor' design be rejected, but also 'mediocre' design. That would rule out three-



Mediocre design – not good enough

quarters of the schemes evaluated in the recent *Housing Design Audit*.⁷ If this requirement is implemented (and that is a big if), then most of our large housebuilders will need to significantly up their game!

Of greatest significance, however, is the new advice that all local planning authorities should produce design guides or codes in order to proactively establish clear design expectations up-front in the development process. While statements in the NPPF cannot force local authorities to do anything (the NPPF is, after all, just policy), this is the closest that any government has come to requiring the production of clear design parameters against which consistent and objective decision-making on design can occur, and against which less enlightened developers will struggle to argue. The NPPF goes on to establish that these guides or codes should be produced on an area-wide or site-specific scale and adopted as part of the Local Plan or as Supplementary Planning Documents – ensuring, in other words, that they cannot be ignored.

Coding for quality

For local authorities unsure what the preparation of such guidance might entail, the publication of the new National Model Design Code is here to assist. This is, in fact, less of a model code and more of a model process that authorities can follow to establish their own code(s).

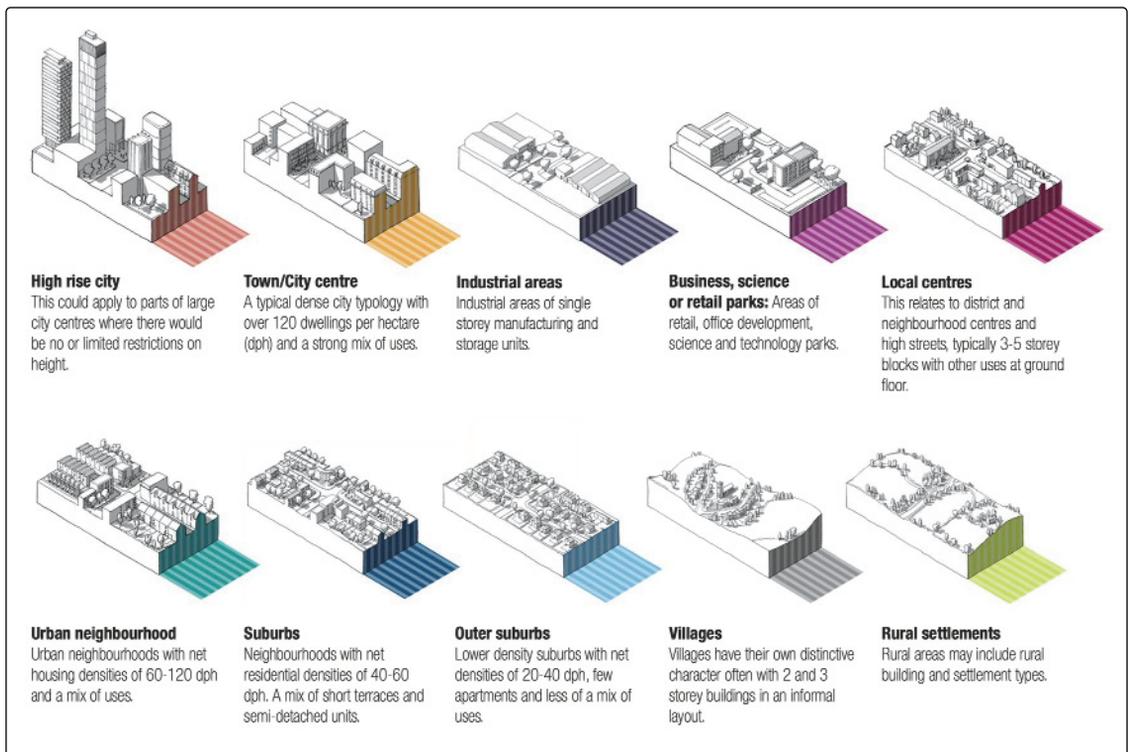
The process is divided between three phases: analysis, vision, and code. And while the scale at

which codes should apply – authority-wide, area-wide or site-specific – is left open, overwhelmingly the drive seems to be towards the first of these, as advocated in the recent Planning White Paper, although not necessarily in the NPPF.

By following through the process, local authorities will ultimately cover their whole territories with coding based on an analysis of character areas and the development and then application of codes responding to different area types (the model offers ten types). In essence, what is being advocated is a move towards a typo-morphological form of decision-making, more akin to practices found in France and elsewhere. It ties in with the approaches advocated in the Planning White Paper, but will require a huge national investment before we can get there.

The National Model Design Code will certainly provide invaluable information for local authorities and others that go down the route of local-authority-wide coding. Where it is less useful is in demonstrating the application of coding to particular sites. With the publication of the guide, coding has taken on a new and larger remit than the sorts of site-specific coding practices that we have seen up to now in England and that the *Housing Design Audit* showed are currently the most effective means of delivering design quality (and much more effective than generic guides).

So while reference is made to masterplanning as one of the phases of code production (perhaps a little confusingly coming before area-wide and generic coding), what is missing is a simple step-by-



Ten area types

Source: Figure 10 in *National Model Design Code*³

step process for applying the carefully considered and well articulated codes in the National Model Design Code to actual sites. This would seem to be a missed opportunity, although one relatively easily addressed in any future iteration.

Several elephants in the room

The creation of the Office for Place, revisions to the NPPF and the publication of the National Model Design Code together represent a step-change in the government’s approach to design quality, and feature widely in its formal response to the Building Better, Building Beautiful Commission. Together, they demonstrate a new belief in the value of urban design; and if the Commission has been able to lock that into government thinking then it has made a huge contribution.

There are, of course, several elephants in the room:

- **The Planning White Paper:** The move towards design codes featured heavily in the White Paper, but we have yet to see how the all-important strategic planning frameworks into which these will fit will be treated. Design begins when we make decisions about which land to allocate and

what it will be used for, and all the coding in the world will not be able to correct errors made at that stage. One hopes that the sorts of crude zoning and pattern books advocated in the White Paper⁸ are now off the agenda, but we will see.

- **The folly of more permitted development rights:** The newly released policy and guidance demonstrates an admirable belief in the potential of proactive design-based planning for new development, but the continued expansion of permitted development rights⁹ demonstrates a worrying disregard for the potential of planning in the much more complex task of managing existing urban areas. Instead, what we see is a belief in a ‘let anything go’ philosophy. This has never worked in the modern era and will not do so now.
- **The highways problem:** The revisions to the NPPF include an important new provision that new streets should be tree lined, but the same new paragraph advocates that ‘solutions are found that are compatible with highways standards’. Unfortunately, those very same highways standards and associated adoption provisions too often end up delivering highway-dominated streets without trees. The response to



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Treeless residential streets

the Building Better, Building Beautiful Commission portends a revised *Manual for Streets* (currently in production), but nothing, so far, has been able to **require** that highways authorities take a place- and people- (rather than roads- and cars-) first approach to new residential areas. The government needs to grasp that particular nettle, or the third *Manual for Streets* will be as ineffective (in too many places) as the others.

● **Skills and resources:** Delivery of any of this (as I and many others have repeatedly said) will be impossible without a transformative investment in skills and resources in our planning system. The meagre pickings offered in the recent Spending Review will come nowhere near what is required (and what the Planning White Paper envisaged) – not, of course, helped by the current rather bleak outlook for public spending. If nothing changes on that front, then we should be under no illusions about what can be achieved ... not much!

A moment of national change?

Despite the elephants, for someone who has campaigned over many years for changes such as those discussed in this article, this is an important moment. Of course, we have seen plenty of fine words and even beautifully produced guidance before, but too often very little to ensure that local

planning authorities have the right support, resources and skills to deliver on the objectives.

Collectively, and despite some of the contradictions already referred to, these changes seem to offer something different, in a genuine determination from on high to see real change in design practices on the ground. This could be a real moment of national change. Collectively, we need to hold the government’s feet to the fire to ensure that it really is!

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Notes

- 1 'All new developments must meet local standards of beauty, quality and design under new rules'. Press Release. Ministry of Housing, Communities and Local Government, 30 Jan. 2021. www.gov.uk/government/news/all-new-developments-must-meet-local-standards-of-beauty-quality-and-design-under-new-rules
- 2 *National Planning Policy Framework: Draft Text for Consultation*. Ministry of Housing, Communities and Local Government, Jan. 2021. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/957295/Draft_NPPF_for_consultation.pdf
- 3 *National Model Design Code*. Ministry of Housing, Communities and Local Government, Jan. 2021. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/957205/National_Model_Design_Code.pdf
- 4 *Building Better, Building Beautiful Commission: Government Response to the Living with Beauty Report*. Ministry of Housing, Communities and Local Government, Jan. 2021. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/957673/BBBBC_response.pdf
- 5 M Carmona: 'A Design Quality Unit for England: five ingredients of success'. Urban Design Matters Blog Entry, Sept. 2020. <https://matthew-carmona.com/2020/09/30/75-a-design-quality-unit-for-england-five-ingredients-of-success/>
- 6 M Carmona: 'Design and the NPPF – rewriting the rules?'. *Town & Country Planning*, 2018, Vol. 87, Mar., 191-95
- 7 *A Housing Design Audit for England*. Place Alliance/ University College London/CPRE –The Countryside Charity, Jan. 2020. <http://placealliance.org.uk/research/national-housing-audit/>
- 8 M Carmona: 'Zoning and local design codes – a fast-track route to beauty?'. *Town & Country Planning*, 2020, Vol. 89, Sept./Oct., 350-54
- 9 M Carmona: 'High streets, sledgehammers and nuts: the folly of more PDR'. Urban Design Matters Blog Entry, Jan. 2021. <https://matthew-carmona.com/2021/01/05/highstreets-sledgehammers-and-nuts-the-folly-of-more-pdr/>