

Radical, lasting reform needs design at the heart of it, not just a part of it: unleashing the contribution of design to delivering more homes through sustainable development

1. Introduction

The Design Council agrees with the government that “radical, lasting reform”¹ is necessary if more homes are to be built. The objective, however, must be to ensure that the planning framework is fit for purpose to secure sustainable development, that in turn increases supply, rather than focussing more narrowly on measures to increase the rate of housebuilding. Too much of what is being built today is poor quality and falls well short of what is considered to be sustainable development that benefits all people’s needs; from providing inclusive spaces, affordability, social housing and homes for an ageing population. As the Housing Minister said in his speech to the Housing Design Conference 2018, “raising the bar on design can help tackle wider issues and help tackle wider social issues too”². Changes to the planning framework should form part of that reform and could have a transformative impact if design is put at the heart of a new approach, using place and people-centred approaches to deliver sustainable communities.

It is clear that the country needs to build more homes. If we are to do so three challenges must be overcome: public and political opposition to many proposed developments; the unprecedented scale of construction involved; and constraints arising from the economics of the housebuilding industry. As this response demonstrates, the design process has a vital contribution to make to meeting each of these challenges: building public support for developments; creating sustainable solutions in a variety of locations; and enabling innovation in the construction industry.

The revised plan sets out positive intention to improve plan making and connect directly to population need, improve the environment, and provide sustainable solutions for communities. However, we believe that a number of significant changes are required to the government’s revised draft of the National Planning Policy Framework if design’s contribution to “radical, lasting reform” is to be realised. We are calling for:

- a fresh approach to the definition of sustainable development (in chapter two) establishing design as a way of integrating the three objectives (economic, social and environmental);
- the inclusion of a set of overarching design principles in the revised NPPF;

¹ Ministry of Housing, Communities and Local Government (2018) National Planning Policy Framework: Consultation proposals, p6

² Housing Minister’s speech at the Housing Design Quality Conference 2018 (2018)

<https://www.gov.uk/government/speeches/housing-ministers-speech-at-the-design-quality-conference-2018>

- amendments to the section on plan-making (chapter three) to ensure that design is an integral feature at all levels of the planning framework;
- a new chapter on engagement, encouraging planning authorities and developers to recognise it as the key to successful plans and developments;
- significant revisions to chapter twelve (Achieving well-designed places) to recognise the enabling role that design could play.

In this submission, which draws on the experience of our design experts and highlights case studies from across the UK, we:

- define design and the way it should feature in the revised NPPF;
- explain the contribution that design could make to delivering more homes;
- suggest a number of major amendments to the NPPF;
- suggest more specific amendments to the revised draft.

In preparing our response we have been keen to collaborate with as many partners as possible. This included convening a reference group with attendees from Mike Hayes Consulting, UCL, the Landscape Institute, Treanor Consulting and Khaa to provide expert insight. The Centre for Ageing Better, part of the network of What Works organisations that promote the better use of evidence, provided further specialist advice and guidance on future proofing all housing stock and we have incorporated their input into section three.

2. What we mean by “design”

By design we are referring not only to the visual quality and layout of new developments, but also to the functionality and liveability of those developments and their contribution to wider social, health and economic objectives.

Design puts the needs of people at the centre of products, services and places. It unlocks solutions to complex problems and makes the connections between products, services and environments that affect our lives. It enables us to think about how services or developments are delivered, what impact they will have, what purpose they provide and how they may bring people together to find agreement and move forward. By connecting people and place, design provides a different way of thinking about housing development, finding new ways of responding to challenges that make a difference to people, and facilitating successful developments by focussing on population need.³ Therefore design should be at the heart of the NPPF and not in just a part of it.

The NPPF does not reflect this potential. Design is essentially confined to a specific chapter and is treated primarily as a potential constraint or test that developers must overcome rather than providing a crosscutting way of thinking. This is not only a missed opportunity, but puts at risk the potential impact this revised framework should have on quality, sustainability and speeding up supply. The revised NPPF should promote design as a way of positively enabling the construction of more sustainable homes. Too often design is seen as being narrowly focused on the appearance of a

³ Improving the design of new housing (2010) Commission for Architecture and the Built Environment
<https://www.designcouncil.org.uk/resources/report/improving-design-new-housing>

development. The NPPF should show how it can be an integrating force leading to development which meets the needs and aspirations of local people, improves health and wellbeing and enables inclusive growth – in other words, sustainable development.

3. Overcoming the challenges to building more homes

Why design matters: *A design-led approach will enable more homes to be built by putting people at the heart of the process making it easier to overcome potential obstacles.*

As we noted in the introduction three obstacles must be overcome if we are to build more homes: public opposition; the challenge of building in different contexts and the economics of the housebuilding industry. In this section we explore those challenges in more detail and explain the part that design can play in addressing them.

The challenges

Widespread public concern about, and opposition to, new developments is a major obstacle. This is inevitably reflected in decisions taken by local planning authorities and, in many cases, interventions by local members of parliament. Local opposition is often reinforced by concerns that the provision of new infrastructure – including roads, public transport, schools and health services – will lag behind the rate of housebuilding. In the current political climate this opposition is also bolstered by declining trust in the political process and experts. These pressures are intensified in areas where the scope for new development is constrained by Green Belt.

In most parts of the country housing markets do not reflect council boundaries. Procedures such as the duty to co-operate and statements of common ground have been introduced to enable more collaboration between councils. It is important to understand, however, that collaboration of this type can be difficult, particularly given the pressures referred to above. The challenges are magnified in “shire areas” where responsibility for key infrastructure lies with the county council rather than the planning authority.

In many areas a significant number of planning permissions are not implemented in a timely fashion. In some cases this is attributed to land holding by developers and land owners. Other factors can also be involved including higher than expected remediation costs on brownfield sites and the fact that there are now very few small and medium-sized housebuilders for whom smaller sites are financially viable.

Using design to accelerate housing delivery in South Kesteven

South Kesteven Council successfully used our design approach to accelerate housing delivery. The focus on housing was part of a wider project to create a new sustainable business model for the council as part of the Design Council's *Design in the Public Sector Programme*, delivered in partnership with the Local Government Association.

Faced with a target of 14,000 new homes by 2036, around 200 new homes were being built each year. This was substantially lower than the 700 a year required. Using the Design Council's Framework for Innovation and the globally recognised Double Diamond, the council reframed their housing challenge and realised that the main issue concerned the economic development of the district. The focus shifted to place making, making South Kesteven a place where developers want to build houses, businesses want to invest and families want to move to.

A new approach to developing the housing strategy was adopted using the discovery phase of the Double Diamond. This created a new, more inclusive dialogue between the council, private landlords and developers. It enabled the generation of new ideas which participants were clear would not have emerged from a more conventional approach.

Success for the council will mean more than an improvement in housing provision. The new approaches are enabling cultural change across the whole organisation and place bringing greater efficiency and agility. Design thinking is playing a huge part in this transformation. To embed the new practices, their first project was to redesign the council tax billing process. The council wanted to understand their customers' needs more clearly so sent their employees out to register and use their council tax service themselves. The resulting council tax bill was clear and easy to use and, as a consequence, saw a decrease in the number of calls to their advice line. Keen to share the approach with the council, South Kesteven transformed their annual all staff meeting from a format of presentations and slides to a session involving everyone using the methods learnt on the Design in the Public Sector programme. Staff were challenged to feedback on five opportunity statements. The resulting 2000 pieces of feedback were refined, organised and fed into the council's property redesign project. In addition, the leadership team at the council recognised the need to create space within the organisation for innovation. To tackle this requirement, a new unit within the council, known as 'Lightbox', was conceived. The aim of the project is to create a platform to enable new ideas to be prototyped and tested in a safe environment, with successful prototypes then rolled out.

If the rate of constructing new homes is to be significantly increased, development will have to take place in a range of contexts – from large scale garden city type developments to smaller infill sites, from high density developments near to public transport hubs to additional housing in town centres. These each raise different design and investment challenges, as well as opportunities. Factors relating to the housebuilding industry are important, and include the scope for off-site construction (to speed up development) the viability of smaller sites and the cashflow implications of different forms of development with an impact of quality, affordability and environmental sustainability.

Finally, it is important to acknowledge that meeting anywhere near the assessed levels of housing and mix of tenure needed will involve an unprecedented scale of development. This has major

implications for the construction industry, for the planning system, for local politicians and, most important of all, for local communities.

Design's contribution

Design has a vital contribution to make to addressing each of these challenges and can help to create the conditions in which more homes can be built more quickly (see table below).

The challenges	The contribution of design
Public and political opposition	Delivering people-led engagement which improves the quality of development and builds support for it
Development in different settings	Enabling place-based solutions which deliver wider benefits
The economics of the housebuilding industry	Fosters innovation in housing construction, design and financing

Adopting a design-led approach across this framework can unlock place-based solutions which ensure that new developments deliver wider social, economic, environmental and health benefits. At the core of the design process is people-led engagement and people centred design which improves the quality, sustainability and impact of development and builds support for it. The design process can also create the conditions for new forms of collaboration between neighbouring planning authorities and between planning authorities and infrastructure and service providers. Finally, innovation through design can generate new approaches to home design, construction and financing which can speed up the delivery of new homes and provide better options for the wider context of people's needs.

Engagement and collaboration

As the case studies included in this submission demonstrate, new development will secure public support if local people are actively involved in the design process. Developers and local authorities must have a grounded understanding of local areas and what matters to local people. Successful community engagement enables people to shape new developments. Public engagement can both improve the quality of the development and build local support for it. It ensures that new developments respond directly to local circumstances and have ambition, legacy and a clear local context.

This applies to both development proposals and local plans. Plans are fundamental to setting a local spatial vision and ambition, design plays a significant role in helping to achieve these aims. We know from our experience with neighbourhood planning that key to successful community buy-in is early community engagement in developing proposals, not just consultation on final proposals.

Re-imagining major development proposals: the charrette
An effective way of using design led engagement to re-think major development proposals is the charrette. It has been successfully used by the Design Council recently in the States of Jersey and by imagineplaces and Look! St Albans in St Albans, Hertfordshire.
Originating in the Ecole des Beaux-Arts in 19 th century Paris, the modern charrette is an intensive planning process involving citizens, planners, designers, developers and other stakeholders who

collaborate on a vision for development. It generally involves three stages: preparation and stakeholder mapping; the charrette itself; and post-implementation work.

In Jersey, the focus was on plans for the Esplanade Quarter and its relationship to the waterfront and historic town of St Helier. A key conclusion from the charrette was the need to focus on a wider area, including the waterfront and harbour. In order to secure a wider vision, it was recommended that the existing masterplan should be de-adopted and that a community engagement strategy was urgently required. A process was agreed to develop a strategy for the wider area of South West St Helier. The vision is to seize the opportunity to create a new world class district. Jersey's government has agreed to de-adopt the outdated masterplan and initiate a new process with a new vision and objectives shaped through the engagement process. This will move through to being adopted in the next few months.

The exercise in St Albans helped to develop a vision for the redevelopment of an important part of the city centre that will make it more attractive, vibrant and appealing. As one participant said: "This is probably the largest non-council led engagement on planning that St Albans has ever seen. I am pleased that 166 different people of all ages helped to set the bar as to what is acceptable for the very heart of our city centre." Following the structured charrette process two 3D masterplan concepts that are widely understood and support have emerged. These masterplans provide a clear steer for the landowners for next steps and deepened working relationships between them, local residents and other local stakeholders. It also means that a shared place vision has been created for all stakeholders to refer to when planning applications are submitted and assessed.

Geography can impede effective strategic planning. Collaboration between neighbouring councils is crucial in many areas. In many places objections to new development are underpinned by concerns that there will be a lag between house building and the provision of hard and soft infrastructure, a lack of affordable homes and too little focus on the needs of local people. Too often there is a lack of integration between the different planning, commissioning and financial processes.

Adopting a design-led process can help places overcome political sensitivities around joint plans and create the conditions for closer alignment with infrastructure provision.

Place-making at the core

The chapter headings in the NPPF reflect the fact that house building cannot be looked at in isolation: building a strong, competitive economy; ensuring the vitality of town centres; promoting healthy and safe communities; promoting sustainable transport. But the fact that they are separate chapters illustrates the challenge. It is crucial that these factors are addressed in the round rather than separately. The design process provides a way of addressing them in an integrated way through a genuinely place-based perspective that draws upon the assets and the expertise of communities to deliver outcomes that are important to them.

The importance of working in this way is highlighted by the fact that delivering the unprecedented levels of home building will require a variety of solutions including:

- large scale, garden city/village type developments;
- development on former employment sites;
- development of small and medium sites;

- town centre developments;
- building at higher densities particularly at and near to transport hubs.

The quality of design is key to successful, sustainable developments in these different contexts which can:

- support economic growth and social inclusion;
- enable healthy lifestyles and support the ageing society;
- help to create sustainable, vibrant places;
- have good access to social and physical infrastructure;
- mature rather than suffer from neglect and poor maintenance;
- house empowered resilient communities which have more control over own destinies.

Caddington Woods, Bedfordshire
<p>The use of an extensive community participation process by John Thompson Partners at Caddington Woods, Bedfordshire resulted in an innovative proposal for mixed tenure housing in a green belt location.</p> <p>The site was originally used by GM Vauxhall to store vehicles. The masterplan, based on a shared vision for a sustainable and connected community, includes 325 homes, reflecting local architectural styles, set in 35 acres of woodland and open space managed by a new community trust. Around 30% of the homes will be affordable with the rental income from some of them used to fund community services.</p> <p>Public workshops were held over two days giving participants from the public and private sectors, and the the local community, an opportunity to share local knowledge and contribute to the future of the site. The process shifted public perception to seeing the site as an inaccessible and unused industrial space which added no real value to the area. It also enabled the scheme to meet community needs while minimising the impact on the green belt.</p>

Innovation in construction

Design has a unique contribution to make in how new homes are constructed and financed as well as to how they are planned. We have a track record of using our design processes to enable innovation in a variety of businesses and sectors.

The challenges in the construction industry to which this approach could be applied include:

- developing ways of speeding up construction, while improving the quality of housing and contribution to place;
- driving efficiency, the improvement and reduction of defects and longer-term maintenance
- minimising the impact of the economics of development on the type and quality of development;
- enabling a mix of tenures and affordability;
- providing sustainable housing for ageing populations.

Greater use of modern construction methods improves production efficiency, quality and costs and speeds up delivery of new homes. The UK has made great strides to modernise in recent years but progress is still too slow. We must now take the opportunity to accelerate, taking advantage of our world leading design sector to realise the full potential that places across the country have to offer.

Innovation at Rolls Royce

In a complex and competitive market, the requirement for Rolls Royce to innovate by producing new improvements and products has been increasing all the time. In response to the ever-increasing need for speed in design, the business has been leading the sector in developing design engineering automation and ‘knowledge-based engineering’ (KBE). KBE uses knowledge models, to represent objects being designed by bringing together the input variables. These include, for example, geometry, engineering, manufacturing, cost and legal rules to develop a coherent knowledge model facilitating integration across systems and applications. This avoids unnecessary re-keying, duplication and has delivered substantial time efficiencies alongside alternative scenario explorations.

Design is one of five core engineering disciplines within Rolls-Royce, and the role of Designer is held in high regard. Designers are responsible for providing creative solutions to complex sets of requirements, and it is this innovation that generates intellectual property for the company and maintains a competitive advantage across its product ranges. The business generates the largest number of patents of any UK company, with 672 patents approved for filing in 2016.⁴

In 2016 Rolls-Royce invested £1.3bn on gross R&D to develop its technologies. There are over 16,500 engineers working at Rolls Royce with about 46% of these engineers working in design. In addition to their in-house R&D capability, the business pursues advanced technologies via their global network of 31 University Technology Centres Partnerships. Each centre is part-funded by the Rolls-Royce Group, working closely with their engineering teams and undertaking specialist work led by a group of world-class academics.

By looking at the design processes and using free-form modelling, Rolls-Royce has delivered increases in productivity of up to 10 times in fan design and a 40% reduction in engine lead time.

⁴ Rolls Royce Holds Annual Report (2016) <https://www.rolls-royce.com/~media/Files/R/Rolls-Royce/documents/annual-report/rr-ar2016-sustainable-business.pdf>

Centre for Ageing Better: Response to the NPPF

We know that over the next 25 years, the proportion of households where the oldest person is 85 or over will grow faster than any other age group and homes that meet the needs of older people will be in greater demand. While it is great to see the reforms in the NPPF, and a clear push towards getting more homes built, tackling abuse of the viability assessment process, and supporting councils to build more homes, there is still a lack of emphasis on the importance of futureproofing our housing stock.

The recent Communities and Local Government committee report on housing for older people recommended that the “NPPF should be amended to emphasise the key importance of the provision of housing for older people in both local authority plan making and decision taking”⁵, enabling councils to identify targets for this. In order to achieve this, it is essential that we futureproof all housing stock and the announced planning policy reforms do not support that.

With viability assessment rules amended to prevent developers from avoiding their affordability housing commitments, we would like to see the same efforts made to tackle avoidance of accessible housing commitments.

This is the first major shake-up of government planning policy since it was introduced in 2012, and we need to take this opportunity to ensure that we are building new homes which meet the changing needs of our population, both for current and future generations. For the UK to really meet the needs of our ageing population, it is essential that all new homes are of good quality and meet minimum standards of accessibility and adaptability, which would include all developers building to a minimum of Category 2 accessibility standards.

4. Achieving sustainable development: mobilising the design contribution

Why design matters: *A design-led approach will help to achieve sustainable development by promoting innovation and considering how to improve quality, taking into account the needs of users.*

Chapter two is one of the most important parts of the NPPF, setting out the three objectives of sustainable development (economic, social and environmental) and explaining the implications of the presumption in favour of sustainable development for plan-making and decision-taking. We recommend that this section be further strengthened by making it clear that the objective of delivering more homes will be achieved only if the principles of sustainable development are pursued. Key to this is ensuring that they are addressed in an integrated way. The design-led approach provides a way of integrating these objectives in an actionable process that informs the nature of new developments, their relationship to existing communities and places, and that reflects the needs and ambitions of local people.

⁵ House of Commons Communities and Local Government Committee (2018) Housing for Older People

We recommend that the best way of achieving this would be to include a set of design principles in this section of the revised NPPF. The design principles would be based on universal ideas of good design. They would not be instructions on how to design new developments, nor would they provide a tick box check list against which proposals should be assessed. Rather they would prompt the necessary consideration about how to improve design quality and outcomes.

The way in which the principles are developed is important. It should involve key stakeholders, including local and central government, the construction and finance industries, and the relevant professions. The citizen, resident and home-buyer voice should also be present in the process.

A growing number of national organisations are establishing design principles including, for example, Highways England and Network Rail. Highways England’s principles are set out in the box below as an example of what can be developed. In his introduction to the principles the Chief Highways Engineer states: “The design principles will help us place good design at the heart of everything we do, and ensure that our roads better serve the people who use them and the environments through which they pass. And we will embed them for the future, ensuring a design-led approach becomes central to the requirements and advice contained in the Design Manual for Roads and Bridges.”

We would like to see a similar paragraph in the introduction to the new NPPF stating: “The design principles will help us place good design at the heart of the development process, ensuring that new developments better serve the people and communities who live, work and visit them. So that we ensure a design-led approach is central to the advice contained in the National Planning Policy Framework.”

10 Principles of good road design
<p>Good road design:</p> <ol style="list-style-type: none"> 1. makes roads safe and useful 2. is inclusive 3. makes roads understandable 4. fits in context 5. is restrained 6. is environmentally sustainable 7. is thorough 8. is innovative 9. is collaborative 10. is long-lasting.

5. Engaging design – the case for a new chapter

Why design matters: *A design-led approach will promote engagement rather than consultation, visualising the future and enabling collaboration between different organisations and disciplines.*

We welcome the reference in chapter three of the draft revised NPPF to the importance of “early meaningful engagement between plan-makers and communities” and other stakeholders. The recognition of the potential of neighbourhood planning to give communities the power to develop a shared vision for the area is also welcome. On the basis of our experience, however, we know that

engagement is critically important to securing high quality design in the widest sense and, consequently, to marshalling the contribution of design to overcoming the barriers to building more homes. In order to reflect this, we recommend that there should be a new chapter on engagement in the revised NPPF.

Lessons from elsewhere: using case studies
<p>Architecture+Design Scotland has produced a number of case studies as a visual tool to highlight elements of successful developments from across Europe to help inspire the delivery of better places in Scotland.</p> <p>The case studies place a visual analysis of a development alongside text from a good practice guide to help readers to understand how to create more sustainable, liveable and functional places. The case study is structured around a number of key questions:</p> <ul style="list-style-type: none"> • Does the place have a distinct identity? • Does the place have spaces that are safe and pleasant? • Is the place easy to move around (especially on foot)? • Does the place make visitors feel a sense of welcome? • Will the place adapt easily to changing circumstances? • Does the place make good use of scarce resources?

A new chapter on engagement should focus on three key issues:

First, the need for early and genuine engagement rather than consultation. Consultation is about collecting views and inevitably results in a binary conversation with “supporters” and “opponents” of a proposal or a policy within a plan. Engagement is about inclusive co-production in a way which unlocks new ideas, perspectives and approaches from communities. It is about reaching out to people and drawing upon their expertise and insight rather than simply providing information to which people can respond.

Second, the role of engagement must be included as a key part of the process for developing proposals for sites and developments as well as local plans.

Third, a recognition of the particular value of design-led engagement. The distinguishing features of this approach, which are evident in the charrette model, include:

- the value of adopting a user perspective, envisaging, for example, what the resident experience could be like in 10 or 20 years’ time;
- the unique perspectives that can be secured by visualising the future of a place or development;
- the opportunity to draw upon the assets and expertise of local communities
- the importance of involving stakeholders in drawing a plan or design: this is and feels like active hands-on involvement rather than offering views;
- the interdisciplinary and interorganisational potential, involving planners, developers and residents, engineers and architects, infrastructure providers and councils;
- the value of independent facilitation which can:
 - keep the process to time and to task;
 - bring an independent perspective and constructive challenge;

- introduce lessons from elsewhere to prompt ideas about what might work in the place concerned.

6. Exploiting the potential of design: a more ambitious chapter twelve – *Achieving Well-designed Places*

Why design matters: *A design-led approach will move beyond just appearance and layout to viewing the whole place - achieving better, more inclusive, outcomes for the economy as well as people's health and wellbeing.*

Design operates at a number of levels. It is concerned with the appearance of buildings and developments, as well as their layout and functionality. It is also concerned with liveability and the potential of homes and residential developments to enable older people to live independent lives, to encourage healthy lifestyles, to support economic growth and address issues of inclusion and to enable community cohesion.

There is a growing body of evidence that shows how the design of buildings, streets, parks and neighbourhoods can support good physical and mental health, help reduce health inequalities and improve people's wellbeing. The built environment can also contribute to a more equal, inclusive and cohesive society if the places where we live, the facilities we use and our neighbourhoods and meeting places are designed to be accessible and inclusive⁶.

As we demonstrated in the previous section, the design process itself is important. This provides an opportunity for the active engagement of local people and a wider range of stakeholders.

The current draft of chapter twelve focusses on design in terms of appearance and layout. It treats design as a test to be passed rather than as the heart of a process to enable the construction of more homes. The draft talks about design in terms of assessment and mitigation. Rather than as a way to unlock opportunities, foster community engagement and insight, improve the resident and citizen experience and help to achieve better outcomes in terms of the economy, health and wellbeing and inclusivity.

We welcome the reference in the draft NPPF to the use of tools and processes such as design codes, design briefs and reviews. However, the draft does not pay sufficient attention to the ways in which these tools are developed and used. If design is to make the essential contribution that it can, this means that for example all stakeholders, including local people, are involved in preparing design guides. Proposals will then be more likely to reflect the ambitions and concerns of local communities from affordability to access to hard and soft infrastructure. It is also important to recognise the strategic value of design reviews when mechanisms are put in place to capture lessons and outputs from individual and multiple reviews and are then used to inform council wide policies and plans.

From our experience of working with local authorities and developers across the UK there are a number of other steps that a more ambitious chapter twelve should recommend in order to enable us to fully exploit the potential of design to enabling the construction of more homes.

⁶ Design Council and Social Change UK (2018) Healthy Placemaking
https://www.designcouncil.org.uk/sites/default/files/asset/document/Healthy_Placemaking_Report.pdf

First, there should be a shared vision for the future of the place, including what it could look and feel like, as well as its function as a place to live, work and visit. All relevant stakeholders, including local people, must be involved in shaping the vision.

Second, contextual evidence should be used to inform the vision, the local planning framework and individual developments. This evidence, combined with public engagement, will ensure that new developments are informed by and address local needs and circumstances.

Third, public engagement must be at the heart of the approach (see previous section).

Fourth, in most places engagement across a wider area than a single planning authority will be necessary. Design support, advice and facilitation services provided by an independent body could enable progress to be made.

Fifth, there is a danger that the emphasis placed on the call for sites element of the local plan process undermines the value of wider place-making. Design processes can help to maintain the crucially important wider focus.

West Howe: Active by Design

Built in the 1950s, West Howe is located on the north westerly edge of Bournemouth and is a neighbourhood of around 10,000 people. It suffers from multiple deprivation. It is made up of semi-detached and terraced houses, and low-rise blocks of flats, with much space between homes and the streets. Featureless green spaces remain unused, and hard landscaped areas such as garage courts and parking areas are underused. The area has been designed primarily for movement by cars and doesn't encourage people to walk or cycle for short distances. Outdoor spaces and community facilities are unattractive and in need of improvement. It is typical of many neighbourhoods throughout the country.

As part of its Active by Design programme, Design Council was appointed by Bournemouth Borough Council in 2014 to work with residents, the Council and local stakeholders to create a vision for change for West Howe, aiming to use the area's existing assets to improve residents' health and wellbeing by collaborating with, and empowering, the local community. The first step was to appoint twelve local resident 'Ambassadors' to help develop a vision, some initial proposals for the area and an action plan for the future. The Ambassadors visited successful places nearby for inspiration, and then led walkabouts through West Howe involving residents of all ages and Council representatives. The aim was to look objectively at their neighbourhood, including what worked well and where there were problems. A draft vision statement was produced based on the outcomes of this work. This information was exhibited in several popular local venues to encourage wider discussion and support with more than 250 people participating.

The opportunity for new homes was seen as an essential next step for longer-term change. The resulting Action Plan identified projects that could be taken forward in the short, medium and longer term. These included recognising the potential for small scale housing projects to make better use of garage and backland sites, creating a new heart to West Howe through infill development, and providing an accessible and attractive new park. Design Council then helped to translate this information into a physical regeneration vision for West Howe. This document made a commitment to ensuring residents continue to be involved in the design of future projects. Since the project

Bournemouth Council has made significant investments into the area, including £100,000 to improve a local community centre and refurbishing a parade of shops used by local residents.

7. Design at the heart of plan-making

It is critically important that design considerations are taken into account at every level of the planning process and that the NPPF recognises that the design process can help to deliver all effective plan-making. Chapter three of the NPPF (Plan-making) notes the role of local policies in establishing design principles. It also recognises that neighbourhood planning gives communities the power to develop a shared vision for that area.

However, in order to achieve the objective of building more homes in a sustainable way it is important that the NPPF fully articulates the contribution that people-led design and engagement can play at a strategic level, as well as local and neighbourhood level.

Collaboration between councils is increasingly important and the draft new planning policy guidance note sets out the government's proposed approach to statements of common ground which are expected to address strategic issues across local authority boundaries. It is important that design considerations are taken into account in this process. The draft should also point out that the design process can help to secure effective collaboration between councils.

The draft NPPF also describes the function of strategic policies in the planning framework. Design considerations should also be referred to in this section. The draft should acknowledge the part that effective design can play in integrating the different strands of strategic policy-making referred to. It is also important that the advice refers to the value of the strategic policies being developed in the context of a shared vision for the place. One in which key stakeholders including local residents have been involved.

8. Detailed comments

Chapter Four: Decision Making

We would like to see a reference in this section on pre-application engagement and frontloading about the benefits of design review. Design review is a tried and tested method of promoting good design and is a cost-effective and efficient way to improve quality. At its most effective it offers independent, impartial advice on the design of new buildings, landscapes, public spaces and components of the infrastructure networks to improve the efficiency and effectiveness of the decision-making process.

The draft London Plan, for example, makes specific reference to the benefits of Design review and states: "Boroughs and applicants should use design review to assess and inform design options early in the planning process. Design review should be in addition to the borough's planning and urban design officers' assessment and pre-application advice."

A similar reference should be included in the NPPF.

Design review is at its most effective when consistently delivered and set within a strategic framework, linked to an effective means of collecting and considering the collective insights gained from its use that can provide benefits to all parties.

Chapter Five: Delivering a Sufficient Supply of Homes

Reference is made in this section to:

- the contribution that small sites can make to meeting the housing requirement of an area;
- the contribution of larger scale developments, such as new settlements or significant extensions to existing towns and villages.

Design has a major contribution to play in ensuring that developments of these types are sustainable. For example, densification may require the intensification of other uses (such as retail, employment and entertainment). The cumulative implications of construction on smaller sites must be planned for in a positive way. They are likely to require new models of management and maintenance, as well as more innovative approaches to consultation and engagement. By focussing on good design development planning should not only consider housing aesthetics and numbers. It should also put the needs of people at the centre of housing growth, enabling new development to have a positive impact on existing residents and communities.

Promoters of large scale developments must learn from experience about what works in developing sustainable high-quality environments. This includes the creation of mixed use neighbourhoods that are affordable, inclusive, safe, healthy and attractive. Creating a lasting legacy involves a wide-ranging partnership of stakeholders and requires collaboration. It is not just about local authorities and developers, we now have a more complex development sector, with organisations such as LEPs, NHS, police and infrastructure providers also having an important part to play. But critically, the needs and aspirations of communities and people must be at its heart. The challenge is to plan a new model for how we design, plan and build and support the resilient communities of the future.

Chapter Eight: Promoting Healthy and Safe Communities

We are concerned about the deletion of the reference in this section of the current NPPF to the need for local planning authorities to create a shared vision with communities of the residential environment and the facilities they wish to see. As we have argued above, we strongly recommend that this is reinstated, as developing a joint vision is a critically important part of the design process and its contribution to delivering more homes.

There is a growing body of evidence that shows how the design of buildings, streets, parks and neighbourhoods can support good physical and mental health, help reduce health inequalities and improve people's wellbeing. Placemaking processes that capitalise local community assets and insight support the creation of quality public spaces that contribute to people's health, happiness, and wellbeing.

Healthy environments are fundamental to developing people centred communities. Designers and planners that consider how a place results in better health outcomes can create opportunities for

developments to respond positively to the challenges of public health and generate thriving urban spaces.⁷

9. Conclusion

The scale of development required to meet our housing need is unprecedented. This means that using the planning system to secure sustainable development is more important than ever. This will require imagination, innovation and integration. The design process is best placed to deliver these attributes. Design identifies shared challenges and common connections across multiple stakeholders. It facilitates close collaboration and accelerates the creation of alliances to overcome common challenges. Building more homes requires public engagement throughout the process, which is an integral feature of a design-led approach.

The proposed revised National Planning Policy Framework includes references to design and engagement, but it does so in a much too narrowly focussed way, rather than as the organising principles of a reformed approach to planning. The government should seize the moment and use the revised NPPF to introduce genuine and far-reaching reform that can transform the lives of people by providing access to quality housing development that facilitates economic and social renewal in communities across the country.

The government could achieve this by developing a set of overarching design principles which would form a core element of the new NPPF and would ensure that design is an integral feature at all levels of the planning framework. We recommend that the government should also include a new chapter on engagement in the NPPF, establishing it as key to successful plans and securing public support for new development which reflect local people's needs and ambitions.

⁷ For further information see: Public Health England (2017) Spatial planning for health: an evidence <https://www.gov.uk/government/publications/spatial-planning-for-health-evidence-review>