

Purposeful design for homes and communities

Design Council response to
the Housing White Paper

1. Introduction

1.1 Design Council welcomes the government's Housing White Paper; its aim to tackle affordability, to increase the supply of homes to rent and buy; and its emphasis on design and quality. It is imperative that we build homes that meet the needs of people and communities, today and in the future. To achieve this we need a step-change in how we think about and deliver housing development in the UK. A step change that is focused not only on volume and supply, but on high-quality design, people and places across the country – purposeful design for public benefit.

1.2 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 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 makes a difference to people, facilitating successful development by focusing on population need.

“Good design is about more than aesthetics. It is about delivering...for its users, and for everyone affected by it.”¹

1.3 Quality housing development is integral to building prosperous, sustainable and resilient communities. Making sure we have the good quality homes that people need, and that they can afford, with the necessary physical and social infrastructure that transforms quality of place enabling areas to thrive, is fundamental to economic growth.

1.4 The challenges faced in today's society - such as an ageing population, poor health and social inequality - mean we have to think differently about the purpose and sustainability of what we build and the places we create. Crucially, the homes we build must form part of the solution.

1.5 The Housing White Paper presents an opportunity to transform our approach to housing policy in the UK. Building the homes that people need, but in a way that supports them to live fulfilling, healthy, active and

¹ Phil Graham, Chief Executive, National Infrastructure Commission.

independent lives. It should also tackle the factors that create social inequality, prevent people achieving their potential and contribute to economic growth in all parts of the country. The new generation of garden towns, healthy new towns, other large settlements and major regeneration projects presents a golden opportunity to create a lasting legacy of places that are sustainable, inclusive and resilient.

1.6 However, to achieve transformation at this scale requires a new approach to how we design, plan and build homes and communities. It must connect all those involved including the government, local authorities and private sector, to public service commissioners, providers and residents. It must also respond to and nurture the emerging development landscape we have today with local authorities, housing associations, the private sector, community and self-builders all playing increasingly important roles and diversifying, for instance directly into housebuilding or expanding build for a range of tenures. Under this complex backdrop it is critical that all partners and stakeholders are supported to collaborate and to build and develop a housing growth vision that has a positive impact and legacy for people and communities.

1.7 It must address the skills shortage facing construction and wider design industries, supporting sectors to innovate and use modern methods to deliver quality homes at pace and scale. Construction methods are largely unchanged from the middle of the last century. To respond to the housebuilding challenge the country faces, the industry will experience significant change and require support. Innovation in construction will deliver higher environmental and energy efficiency standards that are crucial in response to climate change.

1.8 As an independent charity Design Council brings unique insight, reach and knowledge, shaped by 20 years' experience working directly with places and stakeholders to foster collaboration and shape development and built environments, that help deliver this step-change. Our [Design for Growth Blueprint](#) outlines a new approach to delivering sustainable, inclusive economic growth that works for all people and communities across the UK. In it we outline the fundamental role design plays in driving innovation, collaboration and growth. Crucially we set out that economic growth requires joined policy from supporting business innovation and thriving sectors to developing housing, places and the social infrastructure needed to foster resilient communities. To do this the country needs a housing policy that responds to the economic and social challenges of the 21st century to help transform lives for generations to come. To do this the country needs design.

1.9 Our offer to the government is to extend our Design for Growth Blueprint to deliver sustainable and impactful housing growth, as set out in the White Paper. We will use our relationship with places, developers and stakeholders – right across design, commissioning, development and construction - to help navigate the complexities of the new housing and changing economic and social landscape. We will use our independent brokering role on the ground to bring forward clear visions and objectives which support design-quality, innovation and new thinking to deliver transformational outcomes from housing development for people and communities across the country. We will do this through building awareness, sharing insight, spreading good practice and using the professional expertise of our national network of 400 Built Environment Experts, helping all partners deliver more homes, better homes and better places, faster.

1.10 This is purposeful design for public benefit – delivering homes and communities that improve people’s lives.

Feedback from participants on the design review process

- 97% felt Design Council input was helpful in inspiring higher quality design and felt our advice was taken on-board
- 95% felt our input and advice was helpful at pre-application stage, with 86% believing we had helped unlock design issues. 90% felt we had helped ensure schemes met the needs of users
- 98% felt we helped maximise the value of the scheme, with 76% believing we helped expedite the planning process by building consensus. 74% felt we helped schemes improve economic outcomes.

Results of survey of local authorities, developers and communities who have received Design Council design advice support since April 2015. Surveys carried out immediately after support provided and six months later.

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2. Purposeful design for homes and communities

2.1 The Prime Minister has recognised that the country's broken housing market is one of the greatest barriers to progress in the UK today. This affects people's ability to own or rent a home of their own, fundamentally affects quality of lives and restricts people's ability to thrive and prosper. To truly transform lives and deliver prosperity for all we must do more to provide the homes that our country needs. Good design is vital to delivering this.

2.2 Making sure people have good quality homes that they can afford is fundamental to creating sustainable places. Good, affordable housing enables businesses and public services to attract and retain the skilled staff they need, while well-designed environments that are inclusive, dynamic and resilient provide the framework for the UK's economy and social infrastructure. In our response to the Industrial Strategy we set out that government interventions to improve living standards can only work if national and local policy integrates around a clear vision and economic plan. It is vital, therefore, that the Housing White Paper is fully integrated to a national strategy for rebalanced economic growth and wider health and social care policy that responds to the changing landscape of health inequalities and an ageing population.

2.3 Today's society faces historic challenges including, growing demand for quality mix-tenures of housing to meet the needs of 21st century communities, a growing and ageing population, poor health outcomes and social inequality. Good design plays a vital role in tackling this. Crucially the scale of change required to deliver housing volume, alongside the global shifts in the ageing population and emerging technological innovation and digital living means a step-change is required in how the built environment is considered and interacts with the wider challenges the country faces. Through purposeful design, we can not only increase good quality housing supply, but provide the blueprint to help improve the health, social and economic outcomes of people living in modern Britain.

2.4 Design Council can play a key role in delivering this ambition. Supporting and extending the White Paper. Helping places to shape and deliver a local vision for how they can improve their area, provide more homes, better jobs and a better quality of life for the people that live there. This draws on our long experience of working directly with places helping them to overcome problems (supporting on more than 850 projects since 2011) and our 'connected approach' - looking not just at housing, but at the total place, making connections between homes, jobs, transport, public services and green spaces.

2.5 Fundamental to the country's success in building more homes is the support of local communities for new development. Key to this is making development more acceptable. This requires developers and local authorities to have a better understanding of local areas and what matters to local people. It not only improves outcomes for local people but is beneficial to industry, improving results and viability for developers.

2.6 Neighbourhood planning has seen a huge appetite among local communities to take ownership of what happens in their area and to shape the change they want to see, from the type and quality of housing developed, to the community facilities and services needed. Successful community engagement enables people to help shape housing development. By increasing participation it not only improves development it facilitates support and helps people recognise locally grounded development that responds directly to their need, has ambition, legacy and a clear local context. This is good design. As we have seen from neighbourhood planning, key to successful community buy-in, is early local engagement in developing proposals – not just consultation on final proposals. This builds positive engagement and input into the planning process.

2.7 The same approach has to be taken at local authority level, understanding and responding to the needs of the community and area as a whole, setting the ambition and responding to local need and context. Local Plans are fundamental to setting this spatial vision and ambition. Design helps achieve this.

2.8 Understanding what development means for infrastructure and how people use the area where they live is also important. For instance, will development mean more congestion, over crowded public transport, longer waiting times to see a GP; how will it affect the quality of spaces, in parks and town centres? These are all key considerations and will impact on how successfully a place meets the needs of a local community.

2.9 Proper infrastructure planning is therefore essential, not just in making sure homes and places can function (roads, utilities, waste etc) but so that places can actually enhance the quality of people's lives. This means proper coordination and planning between public and private sector – utilities, roads, transport, NHS, primary care, social care, schools, etc. Digital infrastructure is also vital, allowing people to benefit from how technology has and will continue to transform our lives.

2.10 How we design, plan and build the homes and places we live in can enhance our lives now and for generations to come. By continuing to strive for the highest standards of construction helps improve environmental efficiency and reduce household bills. Greater use of modern construction methods improves production efficiency, quality and costs and speeds up delivery of new homes. The UK has made huge strides to modernise over 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.

2.11 This is especially critical for architecture and construction, facing a significant skills shortage in the years to come². We must ensure we have the skilled workforce to deliver the scale and type of homes that are needed. In particular it means investing in education and skills across the workforce to deliver innovation and modern methods. Our response to the Industrial Strategy made the case for a national skills for growth strategy and local activity to address the skills gap facing key industries and to prepare the country for the future. To meet the needs of the Housing White Paper a comprehensive strategy for diversifying and transforming the construction industry is needed. The government and industry must work together with the skills sector to ensure the industry has the support it needs to be able to innovate and deliver homes at pace and scale.

2.12 We also have to think differently about the places housing developments create and how they address key factors such as economic growth; a growing and ageing population; poor health and social inequality. By thinking about these fundamentals for growth at the start, how places work, the type of environments they create and how infrastructure and services are provided, we can better address challenges in the long term – transforming outcomes for communities across the UK.

2.13 For example, tackling poor health outcomes means places where walking and cycling are the first choice; where open and green space encourage healthy lifestyles and wellbeing (including mental health); where homes are adaptable for our entire lives; health services are located and provided in ways which better integrate with other services, focussing on prevention rather than cure. The NHS's Healthy New Town programme is already pioneering some of this in its work in 10 developments across the country. In our Transform Ageing programme we are working with communities and service providers to use design-led solutions to reimagine

² <http://www.constructionleadershipcouncil.co.uk/wp-content/uploads/2016/10/Farmer-Review.pdf>

and redesign the services that people need to enable them to age well and to lead healthier, more active and independent lives.

2.14 We have an enormous opportunity in the government's Garden Towns Programme to extend this design approach and make sure that new towns and communities embrace this chance for change. We must create a lasting legacy we can all be proud of. This means making sure design innovation is at the heart of how we think about housing development; driving how it connects to future growth and social need and crucially, how it will work for the communities that will live there, not just for those planning or building housing developments. This requires joint action from the government, local authorities, public service commissioners and providers, and the private sector. It requires meaningful independent engagement with communities and a collaborative purpose across partnerships to build environments that are first and foremost there for the public benefit.

2.15 These new developments, towns and settlements must learn from the independent experience, reach and design expertise of organisations like Design Council about what works in developing sustainable, high-quality environments, including the creation of compact, high-quality, mixed-use neighbourhoods that are inclusive, safe and attractive. Making sure there are opportunities for jobs and business growth, so we do not create a new generation of commuter towns; getting a mix of good quality housing types and tenure, that meet the different needs of all people in society; capturing land value uplift for the benefit of the community; long-term management and maintenance of community assets; and crucially engaging communities to build support, improve design and deliver impact.

2.16 To create this 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 local authorities, housing associations, the private sector, community and self-builders all playing important roles that require support to grow and impact. Local Enterprise Partnerships, skills providers, the NHS, police, utilities and other infrastructure and service providers all have an important role to play. But critically, the needs and aspirations of communities and people must be at its heart.

2.17 The challenge of housing numbers is significant but the opportunity to make a step-change and provide homes that deliver outcomes for people, places and industry is great. How we view housing can transform outcomes for people. As a country we cannot afford to see housing simply in terms of unit numbers. Instead we must focus on the public benefit of housing as part of the solution to the problems that society faces – just as

better housing played a role in designing out infectious diseases after the second world war.

2.18 To do this requires a new, whole-system approach. Just as we are reimagining and redesigning public services, we must reimagine how we provide housing and build resilient, prosperous communities. This will require new ways of working, new models of delivery and testing innovative approaches. The UK has the best design industry in the world. We have world leading architects and construction companies, alongside innovative housing associations and niche developers driving new methods and transformation. The challenge for us all must be to develop a new world leading model for how we design, plan and build the communities of the future.

2.19 Design Council has more than 70 years experience of using design to transform how we do things, support innovation and drive economic growth to improve people's lives. We have worked tirelessly with places up and down the country to help tackle the challenges they face in providing the quality homes and places that will transform their areas and improve the lives of those who live there.

2.20 As an independent charity we can bring our valuable insight and knowledge, shaped by experience of working directly with places and stakeholders across the country, to support government to deliver this step-change.

2.21 Our offer to government is to use our relationship with places, developers and partners – right across design, commissioning, development and construction - to help them navigate the complexities of the new housing landscape. We will use our brokering role to help bring forward clear visions and objectives which support design-quality, innovation and new thinking which better address the challenges and provide outcomes, including health and wellbeing, that deliver for people and communities across the country. We will do this through our Design for Growth Blueprint; building awareness, spreading good practice and using the professional expertise of our national network of 400 Built Environment Experts, helping all partners deliver more homes, better homes and better places, faster. Delivering purposeful design for public benefit.

Key recommendations:

- Everyone involved in producing the built environment has a crucial role in delivering a step-change in how we design, plan and build homes and communities that tackle poor health and social inequality and helps

deliver wider objectives, such as re-balancing the economy. The government must take a lead with a cross-government approach, that connects policies, services and infrastructure (both physical and social), to deliver a better quality of life for all.

- The government must strengthen the NPPF to require local planning authorities to ensure that development meets the principles of inclusive design, so that we create places that everyone can use irrespective of age, ability, gender ethnicity and social background.
- The government must seize the opportunity of how we design, plan and build new Garden Towns, Healthy New Towns and other large new settlements, to deliver a step-change in how we deliver homes and communities, with the necessary physical and social infrastructure, so we leave a lasting legacy of sustainable, inclusive and resilient communities that tackle issues such as poor health and social inequality and help rebalance the national economy. This requires joint action from the government, local authorities, public service commissioners and providers, and the private sector.
- The government and the housebuilding industry must work together to ensure the industry has the support it needs to be able to innovate and deliver homes at pace and scale, engaging all stakeholders across design, commissioning, development and construction. A comprehensive strategy is needed for diversifying and transforming the construction industry and supporting - and mainstreaming – innovation and modern methods of construction, to tackle the looming skills crisis facing the industry and to provide more efficient and cost effective housing products, increasing choice for the consumer.
- The government must protect local democratic accountability and must think again about removing design as a valid reason for objecting to development. We strongly urge the government to reconsider the impact of this proposal. Local Development Orders and design codes should not be the only design tools available for local planning authorities and neighbourhood planning groups to use. Flexibility is needed to allow them to use the right tools for the job, depending on local need and context. Independent expert design advice, provided by organisations such as Design Council, is an important tool to support stakeholders in developing clear visions and bringing forward well-designed development which meets the needs of local communities and supports the sustainable growth of places. It shapes the vision for an area and delivers well-designed development proposals.

Design Council offer:

Design Council can provide design advice at a national and local level (operating across the country to deliver and develop insight) to support the government in achieving this step-change, taking a bold opportunity to connect housing policy to social justice, taking a global lead in building communities that meet the needs of 21st century populations. Design Council can help the government by disseminating advice and good practice to places through our independent expert design support.

3. Response to consultation questions

Q1. Do you agree with the proposals to:

a) make clear in the NPPF that the key strategic policies that each local planning authority should maintain are those set out currently at paragraph 156 of the NPF, with an additional requirement to plan for the allocations needed to deliver the area's housing requirement?

b) use regulations to allow Spatial Development Strategies to allocate strategic sites, where these strategies require unanimous agreement of the members of the combined authority?

3.1 Local Plans are at the heart of successful development, setting a vision and framework for future requirements, ambition and opportunities for an area. They also provide certainty and clarity to communities, developers and business. It is crucial, therefore, that in moving to a system of key strategic priorities, the important role of the Local Plan is not lost or diluted. Alongside this, for Local Plans and Spatial Development Strategies to remain effective it is essential that they are kept up-to-date, reflecting evidence of local requirements, as well as changing emphasis and priorities. We welcome the emphasis in the White Paper of local planning authorities having up-to-date plans in place.

3.2 The government has proposed that “key strategic priorities” are those set out in the National Planning Policy Framework (NPPF)³. Design Council believe this is a practical recommendation, however it is important that “the provision of health, security, community and cultural infrastructure and other local facilities” is included in the key strategic priorities that local planning authorities will be expected to plan for (this is currently included in the NPPF but is omitted from the list at footnote 88). We would press that these are clearly inserted to the list of identified priorities. In addition, it is critical that ‘social care and education’ are incorporated into the list of key strategic priorities, strengthening the current requirement in the NPPF for local planning authorities to “work with other authorities and providers to assess the quality and capacity of [this] infrastructure”.

3.3 The government’s devolution agenda has decentralised power and decision-making to elected mayors and combined authorities across the country, and provided for greater strategic coordination and collaboration

³ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

on issues including housing, transport, planning, skills and economic development. Initiatives such as the Northern Powerhouse and the Midlands Engine also provide for further coordination across a much broader spatial scale. It is important that these local partnerships have the right mechanisms in place to enable them to effectively deliver their plans and strategies, including allocating strategic housing development sites (where this works best locally) if they are to make a difference to people's lives and drive housing and economic growth.

3.4 However, effective collaboration is fundamental to delivering successful strategic development. There must be broad support and shared ambition for strategic sites allocated in Strategic Development Strategies, otherwise there is a risk of delay or failure at a later stage. The complex nature of development requires effective stakeholder engagement and coordination to agree shared priorities, enabling good quality, viable development that meets local needs to be brought forward more quickly and effectively.

3.5 This sort of collaboration is now more commonplace and when operating effectively partnerships bring buy in, pace and scale. However it is not straightforward. It brings together different organisations, each with their own organisational priorities, budgets, governance and decision-making frameworks. Effective engagement and coordination to build shared priorities is important. Partnerships often struggle or fail where they are unable to build a common understanding and shared priorities.

3.6 Yet despite this challenge the need for collaboration remains. Strategic Development Strategies should not come at the expense of effective engagement. In our experience, it is not a requirement to collaborate that is the problem but the mechanisms used to engage and bring about support. Design is central to getting this right. Place leadership and effective stakeholder engagement require close cooperation, joint working and a shared vision. We have extensive experience of building support to enable effective and successful local developments. Our Local Plan Review Panels have supported over 100 local authorities across the country develop visions for their Local Plans. We have experience working in places with complex delivery landscapes to use design processes at the earliest stage of development to broker and forge strong collaboration and partnerships. This helps build an agreed vision, support and deliver successful implementation of Local Plans.

3.7 Using the secretary of state's powers to direct groups of authorities to work together must always be a matter of last resort. Early identification and support for places through the use of design, is more likely to result in

the positive and sustainable outcomes that can deliver pace and scale, preventing potential challenge later down the line. The government should consider how it can identify and target early design support for places. Design Council can help the government through the design support we can offer places, tailored to meet local need to help improve joint working, avoiding the last resort use of the secretary of state's power of direction.

Recommendations:

- Use of the secretary of state's powers to direct groups of local planning authorities to work together must always be a matter of last resort. The government must identify those authorities sooner and target early stage support, including design support, for them to help build effective collaboration to deliver the housing needs of their area.
- The government must reinstate "the provision of health, security, community and cultural infrastructure and other local facilities" in the key strategic priorities for local planning authorities to plan for, and add social care and education. This will ensure local planning authorities are properly considering and planning for the comprehensive needs of their communities.

Delivering collaboration and partnership through design

Cranbrook is a new community in east Devon. 3,500 homes are planned in the first phase of development. The project involves several partners and Design Council were appointed in 2015 to independently chair and facilitate partnership meetings, helping to unlock and broker key issues. Outcomes have included:

- brokering and setting the strategic direction to deliver the Cranbrook Vision
- setting up project governance structures and addressing immediate delivery issues
- establishing collaborative working between partners, with a clear structure and recommendations to address their respective priorities
- providing an environment for open discussion of the challenges and aspirations for the project.

Design Council's role was seen as critical by all partners and progress with the development has continued, with planning applications for the next phase of the expansion - around 4,100 homes - submitted in 2016.

Q2. What changes do you think would support more proportionate consultation and examination procedures for different types of plan and to ensure that different levels of plans work together?

3.8 For consultation and engagement to be effective it is crucial that different Local Plans and Spatial Development Strategies are clear on their role and purpose and how they align with - and support - other related plans and strategies.

3.9 Timely and proper consultation and community engagement in planning is fundamental. Design Council knows from our work with places across the country that positive, proactive and early community engagement leads to better outcomes, including higher levels of public engagement and satisfaction; policies and developments that better meet local need; and fewer risks and delays. Neighbourhood planning has demonstrated the positive outcomes that come from engaging communities in planning for the future of where they live (1,400 communities taking part in neighbourhood planning, covering 6.1 million people).

Engaging communities in neighbourhood planning

Design Council's work with neighbourhood planning forums has helped embed good design in local communities and into emerging neighbourhood plans. Community engagement was a key feature of this. Our support for neighbourhood forums included:

- strategies for engaging local groups, communities and businesses to create an outline vision for their area
- workshops to understand the views of different groups in the community
- supporting communities develop visions for how they wanted their area to change
- workshops looking at housing design and a townscape analysis, to think about the local architecture, use of buildings and local landmarks and views
- training on good design, including using Building for Life 12
- advice on understanding the planning process and how to evaluate development proposals

3.10 Our report, *Planning for Places*⁴, identified that central to effective consultation and engagement is having a clear, compelling vision and the importance of ‘telling the story’. It should provide a clear vision for a high-quality place and the strategy to deliver it, with an emphasis on how places can be improved and benefits to the public. This helps everyone involved understand the unique qualities and needs of a place and its priorities for the future. By taking a spatial approach it is easier to be specific about what a place will look like in 20 years and identify the essential things needed to achieve the vision. This allows local planning authorities to build shared objectives for an area and to set clear briefs and plans that help developers better respond to the needs of the area and communities to positively engage by understanding longer term goals. This approach achieves greater public benefit, in terms of better community engagement; and developments that better understand and respond to local need. This allows proposals to come forward quicker and reduces delays and objections.

3.11 Clarity of purpose and end goals is essential for developers, investors and - critically - communities. Ensuring clarity and alignment between different spatial plans increases the importance of early and meaningful engagement and collaboration between partners to draw up plans. In areas with elected mayors and combined authorities, the involvement of local authorities on the combined authority provides a useful mechanism to achieve this.

3.12 Design creates the spatial vision for places. It is also a tool for supporting collaboration and agreeing a shared vision and common priorities. Design Council can help the government through the design support we can offer places and partnerships in developing their vision and spatial plans for an area – helping them build collaborative partnerships that align strategies and priorities. The government should promote the important role that design can play in developing and aligning different spatial plans in National Planning Practice Guidance.

Recommendations:

- Local planning authorities and combined authorities should recognise the important role that design can play in developing and aligning different spatial plans, and the government should promote this through National Planning Practice Guidance.

⁴ http://www.designcouncil.org.uk/sites/default/files/asset/document/planning-for-places_0.pdf

Q3. Do you agree with the proposals to:

a) amend national policy so that local planning authorities are expected to have clear policies for addressing the housing requirements of groups with particular needs, such as older and disabled people?

3.13 The homes we live in are fundamental to our health and wellbeing. With a growing and ageing population the right housing choices will allow people to live independently for longer, reducing pressures on the health and care system - transforming outcomes for individuals and communities.

3.14 It is essential that local planning authorities respond to the housing requirements of older people and disabled people ensuring – through planning and investment - that there is adequate provision available now and in the future. To do this, local planning authorities must recognise the importance of inclusion and embed inclusive design front and centre into the Local Plan. By using design, local planning authorities can understand the level of housing need and plan for the right mix of type and tenure, in the right places. Independent expert design advice will interrogate the full range of local population need and expected shifts (e.g. economic, ageing demographic) in the future.

3.15 Like the wider population, older people and disabled people want a choice and mix of quality housing options to best suit their individual needs. Our Transform Ageing programme is demonstrating how, by engaging users to better understand their experiences and needs, you can design products, services and ultimately places which meet people's needs and support them to age well and better.

3.16 By making sure homes are well-designed, adaptable and take better account of how technology is changing the way we live, we can ensure that people can stay in their homes for longer, enabling them to continue enjoying a high-quality, independent life.

3.17 Just as important as the type of housing offer available to older people and disabled people, are the communities they sit within. We all need – and benefit from – living in places that are:

- attractive and well-designed
- have good access to jobs, shops, public services and facilities
- well-connected, with access to good and accessible public transport links, reducing dependency on the car and encouraging walking
- open and green spaces that encourage healthy lifestyles.

3.18 This underpins people's ability to live independent, active, engaged and healthy lives in later life and it is vital for an ageing population. The Government Office for Science⁵ has identified that if neighbourhoods are not accessible and supportive, older people can become isolated and suffer loneliness, depression and a poorer quality of life. Social isolation (ie having few social ties, infrequent contact with others and living alone) increases a person's risk of dying early by 29%. 37,000 deaths per year could be avoided through increased physical activity and social engagement.

3.19 Inclusion is integral to successful housing development. However this means developments that meet the needs of the whole local population, incorporating the mix of tenures and provision required to facilitate economic growth and address a range of inequalities developing housing that delivers transformation at scale for the local area.

3.20 Design allows us to ensure that the homes and communities we build are inclusive – places that everyone can use, irrespective of age, ability, gender, ethnicity and social background. Good design in housing development can encourage healthy lifestyles, dramatically transforming the wellbeing and prosperity of a community across all age and social demographics, and provide the best environments for people to live well in later life. Through our Creating Healthy Places Programme we champion healthy placemaking, promoting health and wellbeing at the heart of the built environment. This means tackling preventable disease by shaping the built environment so that healthy activities and experiences are integral to people's everyday lives.

3.21 New guidance for local planning authorities on meeting the needs of older people and disabled people does not go far enough. The government must strengthen the NPPF to require local planning authorities to ensure that development meets the principles of inclusive design. Design Council can disseminate advice and best practice on inclusive design through our design support for places (drawing on our Inclusive Environments Hub, design tools such as Building for Life and our current research with Social Change UK, looking at the barriers to creating healthier places).

3.22 Crucially, a step-change is needed in how we think about what we build. Thinking not just about housing volume, but how housing development can drive well-designed places that meet the changing needs

⁵ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/535187/gs-16-10-future-of-an-ageing-population.pdf

of a population; and addressing the challenges of today's society, such as poor health and social inequality. This involves all partners in the built environment, from local planning authorities, to industry and locally elected members.

3.23 However, the government must take a lead, setting the policy framework right across government and connecting the infrastructure needed (physical and social). By doing this we can deliver well-designed inclusive housing and places that support active communities and contribute to wider government objectives, such as the Industrial Strategy. Design Council can provide design advice at a national and local level (operating across the country to deliver and develop insight) to support the government in achieving this step-change, taking a bold opportunity to connect housing policy to social justice, taking a global lead in building communities that meet the needs of 21st century populations.

Recommendations:

- Everyone involved in producing the built environment has a crucial role in delivering a step-change in how we design, plan and build homes and communities that tackle poor health and social inequality and helps deliver wider objectives, such as re-balancing the economy. The government must take a lead with a cross-government approach, that connects policies, services and infrastructure (both physical and social), to deliver a better quality of life for all.
- The government must strengthen the NPPF to require local planning authorities to ensure that development meets the principles of inclusive design, so that we create places that everyone can use irrespective of age, ability, gender, ethnicity and social background.

Design Council blueprint for Inclusive design

- Putting people at the heart of the design process
- Acknowledging diversity and difference
- Offering a choice where a single design solution cannot accommodate all users
- Providing for flexibility in use
- Providing buildings and environments that are convenient and enjoyable to use for everyone

Inclusive design is a key feature of the Queen Elizabeth Olympic Park. Key to this was its early inclusion of inclusive design in the plans and policies of

the Olympic Delivery Authority. This provided a clear standard and certainty for developers, which carried on through to the redevelopment of the Park by the London Legacy Development Corporation. Design Council established a Design Review Panel for the London 2012 Olympic and Paralympic Games and set up the first Access Panel, which reviewed over 50 developments and plans on the quality, access and inclusion, and sustainability and legacy of the London 2012 proposals.

Inclusive Environments Hub⁶

Design Council worked with key professional institutes, the Department for Communities and Local Government and Historic England, to develop our online Inclusive Environments Hub. The Hub brings together latest thinking on inclusive design in the built environment from best practice to guidance and legislation. Our aim is for the Hub to become the recognised go-to-place for information and debate about inclusive planning, design, construction and management. By providing insight, information and discussion on the issues involved, we hope the Hub will help built environment professionals and clients be better placed to deliver inclusive places. The Hub has had more than 4,000 visitors to-date.

Q4. Do you agree with the proposals to amend the presumption in favour of sustainable development so that:

a) authorities are expected to have a clear strategy for maximising the use of suitable land in their areas?

3.24 Local planning authorities should ensure that strategies for maximising the use of suitable land are informed by the Local Plan process. This way, local planning authorities can strategically identify brownfield land suitable for development, while maximising opportunities to use suitable land across their area to meet housing needs. As stated above, coordinated planning that considers the wider social and economic needs and aspirations is critical not only for places, but also for the country's continued economic growth and for meeting the objectives set out in the Industrial Strategy.

3.25 In creating a presumption in favour of brownfield land for housing, it is essential that the NPPF ensures that all development is sustainable and inclusive. It is vital that the NPPF protects against unsustainable and inappropriate development that would negatively impact on people's lives –

⁶ <http://www.designcouncil.org.uk/what-we-do/inclusive-environments>

ie if it did not have good transport connectivity, access to public services, or access to public, open and green space. Design has a crucial role to play. The NPPF is clear that good design is a key aspect of sustainable development and sets out the aims that new development should achieve.

3.26 Design Council has extensive experience of working with places that face significant challenges bringing brownfield land back into use, providing independent expert design advice to help ensure sustainable and inclusive development. Design Council can help the government by disseminating advice and good practice to places through our design support on delivering individual brownfield sites, preparing and delivering brownfield strategies for authorities, and more widely.

Recommendations:

- Local planning authorities must take a strategic approach to identifying brownfield land, which supports sustainable development and supports housing and economic growth in their area.

Design for sustainable brownfield development

Thurrock in the Thames Gateway is undergoing a significant transformative regeneration agenda to achieve sustainable economic and housing growth that changes perceptions of the area. Design Council is supporting Thurrock with a comprehensive Design Advice and Review Panel which has provided independent expert advice on a range of development challenges including advising on the appropriateness of development within the green belt, opportunities for neighbourhood regeneration, development of attractive housing for older people within town centres and working with volume house builders to improve the place making attributes of schemes proposed in the borough. For a major housing scheme seen twice by the Thurrock Panel, the advice given has encouraged the applicant to develop a scheme design that reduces the impact of noise from the Strategic Road Network.

Q7. Do you agree that national policy should be amended to encourage local planning authorities to consider the social and economic benefits of estate regeneration when preparing their plans and in decisions on applications, and use their planning powers to help deliver estate regeneration to a high standard?

3.27 Too many people still live in housing estates that are badly designed, built and poorly managed, resulting in social inequality, crime, anti-social behaviour, and poor health outcomes that affect quality of life and local prosperity. Estate regeneration can provide new homes; improved community facilities and public services; employment and skills opportunities; an improved quality of place; and better outcomes for residents and communities. It also provides an opportunity to rethink how places are designed and function so that they better contribute to improved health outcomes.

3.28 By better understanding people's needs, such as through Design Council's Transform Ageing programme, we can reimagine and redesign services that are provided and how they are provided. Co-located, integrated services which are easier for people to access will help focus on preventing problems occurring. By building this approach and thinking into estate regeneration plans we can better tackle the issues that create social inequality.

3.29 Our response to the Industrial Strategy makes the case for a Design for Growth Blueprint and a national Skills for Growth Strategy, to ensure that people in all parts of the country are equipped with the skills needed for the future, supporting continued economic growth and improvements in the quality of people's lives. Estate regeneration can play a key role in thinking differently about how we meet not only the health and social care needs of people, but also how it can transform economic outcomes by attracting investment and providing space for new or resurgent skills and employment needs.

3.30 Effective community engagement is vital for achieving successful regeneration. People want to feel connected and part of plans to change and improve where they live. Local planning authorities have a key leadership and enabling role in estate regeneration proposals (especially where they are the landlord) and should consider opportunities for estate regeneration as part of the Local Plan and in response to other development opportunities that come forward.

3.31 Design Council's experience of working with places and communities, providing independent expert advice on community-led development and neighbourhood planning, informed the government's Estate Regeneration National Strategy⁷. Much of our good practice and advice is highlighted in the National Strategy's Design and Quality Good Practice Guide⁸. Design Council is currently supporting local planning authorities in the government's Estate Regeneration Programme through workshops providing information and advice and a support package to help them deliver their plans.

Recommendations:

- It is important that local authorities consider the opportunities for reimagining and redesigning services to better meet the needs of residents - as well as how places are designed and function - so we can tackle issues such as poor health and social inequality and rebalancing the national economy, as part of estate regeneration plans.

Q8. Do you agree with the proposals to amend the NPPF to:

e) expect local planning authorities to work with developers to encourage the sub-division of large-sites? and

f) encourage greater use of Local Development Orders and area wide design codes so that small sites may be brought forward for development quickly?

3.32 Innovation and competition in the housebuilding sector is stifled. This inhibits efficiency, improved cost effectiveness and restricts customer choice. Modern Methods of Construction can help the UK address the skills crisis the construction industry faces (the Farmer Review⁹ suggests we will see a 20-25% reduction in the construction industry labour force within a decade) helping to bring forward development more effectively and with greater cost certainty.

⁷ <https://www.gov.uk/guidance/estate-regeneration-national-strategy>

⁸

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/575583/Estate_Regeneration_National_Strategy_-_Good_Practice_Guide_Part_3.pdf

⁹ <http://www.constructionleadershipcouncil.co.uk/wp-content/uploads/2016/10/Farmer-Review.pdf>

3.33 Design Council welcomes attempts to encourage greater diversity in the housebuilding sector. Our response to the Industrial Strategy¹⁰ makes a case for:

- prioritising innovation investment in sectors such as construction;
- a Design for Growth Blueprint, to build greater design capacity to grow the economy;
- a Skills for Growth Strategy – ensuring the country has the skills the economy will need in the future, responding to how technology and innovation are changing skills and jobs.

3.34 In addition, we also need to address the wider skills shortage in the design industry which will impact construction – 7,000 posts across design sectors are likely to face a skills shortage. It is crucial for the competitiveness and continued growth of the economy that we tackle this. Design Council will work with the government to explore options to do so.

3.35 While the aims of the White Paper in encouraging more smaller developers into the market are laudable, the mechanisms to deliver this require considered thought to ensure effective support for local planning authorities so that we do not have the opposite effect of delaying or stopping development from proceeding. With that in mind, the government should develop a comprehensive strategy for diversifying the housebuilding industry, supporting - and mainstreaming – innovation and modern methods of construction while building the skills and capacity to realise the opportunities available.

3.36 We know that Local Development Orders (LDO) and area wide design codes can provide greater certainty for developers and can help drive up quality standards. LDOs and design codes should not be the only tools available for local planning authorities to use. Flexibility is needed to allow authorities to use the right tools for the job, depending on local need and context. Independent expert design advice, provided by organisations such as Design Council, is an important tool to support stakeholders in developing clear visions and bringing forward well-designed development which meets the needs of local communities and supports the sustainable growth of places. It shapes the vision for an area and delivers well-designed development proposals.

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<http://www.designcouncil.org.uk/sites/default/files/asset/document/Design%20Council%20Response%20to%20Industrial%20Strategy%20Green%20Paper%202017.pdf>

Recommendations:

- The government and housebuilding industry must work together to ensure the industry has the support it needs to be able to innovate and deliver homes at pace and scale, engaging all stakeholders across design, commissioning, development and construction. A comprehensive strategy is needed for diversifying and transforming the construction industry and supporting - and mainstreaming – innovation and modern methods of construction, to tackle the looming skills crisis facing the industry and to provide more efficient and cost-effective housing products, increasing choice for the consumer.
- Local Development Orders and design codes should not be the only design tools available for local planning authorities and neighbourhood planning groups to use. Discretion is needed to allow them to use the right tools for the job, depending on local need and context. Independent expert design advice, provided by organisations such as Design Council, is an important tool to support stakeholders in developing clear visions and bringing forward well-designed development which meets the needs of local communities and supports the sustainable growth of places. It shapes the vision for an area and delivers well-designed development proposals.

Q9. How could streamlined planning procedures support innovation and high quality development in new garden towns and villages?

3.37 New settlements are fundamental to meeting the country's housing needs and must be included in the options considered by local planning authorities for meeting local housing need, as part of a strategic approach in Local Plans.

3.38 New settlements offer huge potential to use learning from previous experiences of building communities, such as the importance of timely provision of both physical and social infrastructure, the development of jobs and a strong local economy, and the long term management and maintenance arrangements for community assets.

3.39 They also provide opportunities to design and create attractive and sustainable places that better respond to the challenges that society faces today (such as a growing and ageing population, poor health outcomes and social inequality) and to use the latest technology and innovation that is transforming how we live and work, improving the quality of people's lives.

3.40 Design Council has considerable experience of working with places, providing independent expert advice on planning and designing new high quality settlements and urban extensions of different sizes and scale.

Designing healthy places

The NHS Healthy New Town programme¹¹ is working with 10 schemes around the country to ensure that health and wellbeing is at the forefront of how those new settlements (delivering around 76,000 homes for 170,000 people) are designed and built. The project aims to:

- develop new and effective ways of shaping new towns, neighbourhoods that promote health and wellbeing, prevent illness and keep people independent
- rethink how health and care services can be delivered, supporting new models of care
- replicating learning across other areas of the country

Design Council advised on the selection criteria for the shortlist of sites and took part in the national panels during the shortlisting process; assessed propositions on the National Challenge Panel; and led workshops with the Government Office for Science looking at developing age friendly communities and innovation in health care procurement and telehealth.

3.41 New settlements also provide the opportunity for using the latest innovations in housebuilding, allowing us to build the homes we need more efficiently and effectively and giving the housebuilding industry the certainty and speed and scale of development they need to invest and generate efficiencies of scale.

3.42 However, new settlements can be a long time in gestation and require significant collaboration and coordination between a wide variety of partners and stakeholders to ensure alignment of policies, plans, priorities and investment decisions. For example, Northstowe is a new settlement of around 10,000 homes north west of Cambridge, in partnership between the Homes and Communities Agency and a private landowner and developer. The site was first identified in 2001 and was adopted in the Cambridgeshire and Peterborough Structure Plan in 2003. Development of new, higher development standards for the site and the 2007 financial crisis slowed

¹¹ <https://www.england.nhs.uk/ourwork/innovation/healthy-new-towns/>

progress, and it was not until 2015 when the first construction began on site (a primary school), with the first homes starting in 2016.

3.43 This is too long. This is bad for investor/developer confidence, making it very difficult for smaller developers (whom the government wants to encourage into the market) to commit over such a long timeframe, and reinforcing a business model that does not invest in innovation and high quality. This is also bad for the population, as it does not provide the affordable homes that they need.

3.44 The timely provision of infrastructure – both the physical infrastructure and the social infrastructure that helps create quality of place - is therefore essential to providing the fundamentals needed for places to grow and be successful (ie housing, transport links, commercial sites, culture, services). Infrastructure investment decisions also provide the certainty and confidence that make a site viable. Effective coordination and prioritisation of infrastructure is therefore critical to bringing forward the housing the country needs. This is too important to fail.

3.45 The new Infrastructure Delivery Ministerial Committee, chaired by the Chief Secretary to the Treasury, should take on responsibility for coordinating infrastructure planning and investment across government departments and agencies (including Highways England and Network Rail) – this is particularly crucial in relation to proposed Garden Towns and Healthy New Towns.

3.46 New town development corporations are a tool for acquiring and assembling sites and providing the infrastructure required to enable development to begin. However, the legislation that first provided for development corporations¹² is more than 70 years old and how we design and plan for new communities has changed considerably since then - the legislation merely refers to development corporations securing the “laying out and development of the new town”.

3.47 Given the important role of new settlements, both in terms of meeting housing demand and in improving the quality of people’s lives (the government’s Garden Towns and Villages programme alone is supporting 17 settlements with the potential to provide almost 200,000 homes) it is important that any new development corporations are fit for purpose so they can effectively meet the challenge of delivering the homes and communities we need today.

¹² New Towns Act 1946 and New Towns Act 1981

3.48 The government should ensure that high-quality design of the built-environment is a specific requirement of new development corporations (included in any new or revised legislation) with proposals in the development corporation's area having to meet the policy and standards set out in the NPPF. It should also ensure that the powers of new development corporations are sufficient to allow them to effectively plan, coordinate and prioritise all the infrastructure requirements in their area.

3.49 Design Council has experience of working with development corporations – such as Old Oak and Park Royal Development Corporation - and their partners, providing independent expert advice in developing and delivering integrated place based policies and plans which address multiple dependencies, such as infrastructure and health and wellbeing, delivering maximum benefit to communities.

3.50 To ensure that new towns create a lasting legacy of high-quality, sustainable, inclusive and resilient places that benefit and improve the quality of life for all those who live there, the government must ensure that new development corporations are required to have strategic multi-disciplinary design advice arrangements in place. This will support them and test and develop their plans and major projects to ensure they deliver the highest quality and maximum benefit. Development corporations should also have regard to the recommendations of an independent expert design advice panel in making their decisions.

Recommendations:

- The government must seize the opportunity of how we design, plan and build new Garden Towns, Healthy New Towns and other large new settlements, to deliver a step-change in how we deliver homes and communities, with the necessary physical and social infrastructure, so we leave a lasting legacy of sustainable, inclusive and resilient communities that tackle issues such as poor health and social inequality and help rebalance the national economy. This requires joint action from the government, local authorities, public service commissioners and providers, and the private sector.
- The physical and social infrastructure that new communities need is crucial to their success and the quality of lives of those that live there. It is important that there is effective planning and delivery of infrastructure needs. The new Ministerial Infrastructure Delivery Committee must take on responsibility for coordinating government investment and decisions to ensure new Garden Towns, Healthy New Towns and other large new

settlements are not held up by uncoordinated investment planning and decision making.

- Delivery arrangements for new settlements must be fit for purpose. In legislating for new new town development corporations, the government must ensure that design is a fundamental part of their role on the statute book. The government must also ensure new development corporations have independent expert strategic multi-disciplinary design advice arrangements in place, to ensure their plans and projects deliver the highest-quality and maximum benefit for their new communities.

Development Corporations

The Old Oak and Park Royal Development Corporation is responsible for delivering 24,000 new homes and 55,000 new jobs as part of a new national transport interchange, serving HS2 and Crossrail – Europe’s largest regeneration project. In 2015, Design Council was appointed to manage a Planning, Landscape, Architecture, Conservation and Engineering Review Group to provide independent expert advice across the Old Oak and Park Royal area.

Our work is particularly focussed on the new HS2 interchange station, canalside redevelopment, large-scale housing developments, public realm and open space. We have been able to bring in expertise on economic viability, infrastructure delivery, green infrastructure, inclusivity and culture, and providing advice on the Local Plan and Supplementary Planning Documents. We have tested the emerging vision and supported work to deliver the area’s masterplan, ensuring a coherent and unified character between sites, and ensuring the project delivers benefits for the local community through social and economic regeneration, and better inclusion of health and wellbeing.

Q12. Do you agree with the proposals to amend the NPPF to:

b) make clear that local and neighbourhood plans (at the most appropriate level) and more detailed development plan documents (such as action area plans) are expected to set out clear design expectations, and that visual tools such as design codes can help provide a clear basis for making decisions on development proposals?

c) emphasise the importance of early pre-application discussions between applicants, authorities and the local community about design and the types of homes to be provided?

d) makes clear that design should not be used as a valid reason to object to development where it accords with clear design expectations set out in statutory plans?

e) recognise the value of using a widely accepted design standard, such as Building for Life, in shaping and assessing basic design principles - and make clear that this should be reflected in plans and given weight in the planning process?

3.51 Design is fundamental to thriving, prosperous and inclusive places. As the NPPF recognises “Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.” Design helps set the vision and ambition for a place – the qualities and character that make a place and create the type of place that people want to protect and enhance. Design also defines how people want to make the places around them better, to improve the quality of their lives. To achieve both these things requires people and places to be able to express what good design in housing and place would mean for them. Design Council has considerable experience of working with places and communities and providing independent expert advice to help them identify and express their own design expectations.

3.52 We strongly support proposals to expect clearer design expectations (and to encourage early pre-application discussions about design and the type of development to be provided). However, we know from our experience on the ground that there is no one-size-fits-all approach. Every area is different, with different characteristics, context and need. If design expectations are to be meaningful and useful in informing (and helping to speed up) planning applications, it is important that they are done well. This

requires investment of time and support to build knowledge, understanding and capacity.

3.53 From our work in supporting neighbourhood planning groups to develop design expectations, it is imperative that local planning authorities and neighbourhood planning groups are sufficiently resourced to enable them to produce local design expectations. In particular, the government should provide for an identifiable element within neighbourhood planning grants to fund community groups specifically for the purpose of advice and support in expressing design expectations. This would help emphasise the importance and value that the government attaches to this.

3.54 Local planning authorities are widely acknowledged to be experiencing challenge as a result of under-resourcing, struggling to attract and retain the qualified professionals they need. The planned increase in planning fees, where this is committed to investment in planning departments, is therefore welcome (as is the ability to further increase fees where a local planning authority is delivering the homes their communities need). We look forward to the government's planned consultation on this, but believe it is vital that this supports the delivery of homes and sustainable communities.

Design empowering communities

In 2012, Design Council supported the community in Aireborough, West Yorkshire, to think about how they wanted their community to develop and how design could enhance the character of the area. We supported the Neighbourhood Forum engaging the wider community and businesses, and in developing a vision for the area. We led workshops for the local community, helping them to understand the role of design, as well as the link with wider social and employment needs. This helped embed design into the community - the Neighbourhood Forum recently organised a character workshop to support its Neighbourhood Plan.

3.55 As mentioned in a previous response, Local Development Orders (LDO) and area wide design codes can provide greater certainty for developers and can help drive up quality standards, but they can also be too prescriptive, inflexible and risk stifling creativity and innovation in responding to site briefs or changed circumstances. As the NPPF recognises, "design policies should avoid unnecessary prescription or detail" and "planning policies should not stifle innovation, originality or initiative".

3.56 LDOs and design codes should not be the only tools available for local planning authorities to use. Discretion is needed to allow authorities to use the right tools for the job, depending on local need and context. Independent expert design advice, provided by organisations such as Design Council, is an important tool to support stakeholders in developing clear visions and bringing forward well-designed development which meets the needs of local communities and supports the sustainable growth of places. It shapes the vision for an area and delivers well-designed development proposals.

Delivering design expectations

Oxford is a world-famous city whose historic character attracts people to live, work, study, visit and invest-in the city, but the city's character – along with tight administrative boundaries, green belt and flood risk constraints - add to the challenge for new development, especially in the city centre.

Design Council provides a dedicated independent Design Advisory Panel which has independently tested and challenged more than 150 schemes over the last three years. The Design Advisory Panel has provided the City Council with support on pre-planning and planning application schemes, the Council's vision, masterplans and policy guidance, helping to protect the city's heritage assets and deliver high-quality development.

3.57 We welcome the government's intention to promote good-quality design by reflecting design standards, such as Building for Life, in plans and by giving weight to them in the planning process. However, there are many design tools for achieving good-quality design. Flexibility is needed to allow local planning authorities to use the right tools for the job, depending on local need and context. Independent expert design advice, provided by organisations such as Design Council, is an important tool to support stakeholders in developing clear visions and bringing forward well-designed development which meets the needs of local communities and supports the sustainable growth of places. It shapes the vision for an area and delivers well-designed development proposals.

3.58 Given the fundamental role of design in creating sustainable, inclusive and resilient places we are particularly concerned about proposals that would remove democratic accountability for decisions relating to design. Design coding is not a sufficient alternative to democratic accountability - it does not provide the flexibility to respond to changing environmental, social and economic circumstances – and their success is only as good as those who prepared them and those who implement them.

3.59 Ultimately, poorly prepared design expectations which are unclear or have not gained the buy-in required from a range of complex stakeholders will lead to poor planning decisions, public dissatisfaction and disengagement, reversing positive steps to better engage the public over recent years (notably through neighbourhood planning). We strongly urge The government to reconsider the impact of this proposal and reverse its plans to remove design as a valid reason to object to development, where it accords with design expectations set out in statutory plans. Encouraging earlier use of early independent design advice will provide better, more positive and timely outcomes, reduce risk and provide the scale and pace that is required.

Recommendations:

- The government must protect local democratic accountability and must think again about removing design as a valid reason for objecting to development. We strongly urge the government to reconsider the impact of this proposal.
- Local Development Orders and design codes should not be the only design tools available for local planning authorities and neighbourhood planning groups to use. Flexibility is needed to allow them to use the right tools for the job, depending on local need and context. Independent expert design advice, provided by organisations such as Design Council, is an important tool to support stakeholders in developing clear visions and bringing forward well-designed development which meets the needs of local communities and supports the sustainable growth of places. It shapes the vision for an area and delivers well-designed development proposals.
- The government and local planning authorities must recognise the crucial importance of a properly resourced planning function to deliver well-designed and planned communities. Local communities must also be properly supported, including through the government's neighbourhood planning grant, to enable them to access the support they need to develop their local vision.

Q13. Do you agree with the proposals to amend national policy to make clear that plans and individual development proposals should:

- a) make efficient use of land and avoid building homes at low densities where there is a shortage of land for meeting identified housing needs?
- b) address the particular scope for higher density housing in urban locations that are well served by public transport, that provide opportunities to replace low density uses in areas of high housing demand, or which offer scope to extend buildings upwards in urban areas?
- c) ensure that in doing so the density and form of development reflect the character, accessibility and infrastructure capacity of an area, and the nature of local housing needs?
- d) take a flexible approach in adopting and applying policy and guidance that could inhibit these objectives in particular circumstances, such as open space provision in areas with good access to facilities nearby?

Q14. In what types of location would indicative minimum density standards be helpful, and what should those standards be?

3.60 Sustainable development and creating sustainable communities means making effective use of land – prioritising brownfield land and protecting higher quality land, including the green belt. This will often mean building at higher densities - higher density does not necessarily mean tall buildings. Local planning authorities must take a strategic approach to identifying brownfield land, and land suitable for higher-densities, through their Local Plan.

3.61 Getting higher density development right is vital. A significant increase in density in an area leads to higher number of cars, traffic and congestion; increased use of public transport; additional pressures on GPs, schools and other vital services; and increased and changed use of parks and open and green spaces. This type of development can also affect the nature and character of an area – for example if there is large amount of student accommodation, bedsits/single occupancy flats, short-term rental accommodation.

3.62 It is important, therefore, that any development proposal is considered on its merit. Urban locations such as around railway stations, or existing low-density sites, may well provide good opportunities for intensification (especially given transport connectivity at railway stations). However, this will not always be the case. Development proposals should

function well, adding to the overall area they are in, enhancing the sense of place and responding to local character. This is even more important with higher-density development proposals, which can have a greater impact on the area around them (and wider than the immediate neighbourhood) and the people living there.

3.63 Design Council provides independent expert advice to places across the country on higher-density development, to ensure high-density results in well-designed and high-quality that enhances the local area. Together with Historic England (formerly English Heritage), we set out good practice advice for local planning authorities and developers on tall buildings to help in setting local plans and in preparing and deciding on development proposals. This reflected our practical experience of the impact of an increased number of tall buildings on the built environment, including our own experience of reviewing tall building proposals.

Design for high-density

- Waltham Forest is undergoing one of London's biggest housebuilding programmes, with 12,000 new homes planned over the next few years. The area faces the challenge of intensification and higher density, while protecting the character of the borough, with good quality homes and attractive streets, parks and green spaces. Design Council is supporting Waltham Forest with a Design Advice Panel, providing independent expert advice that puts the benefits to existing residents at its heart, and has supported applicants prepare their proposals ahead of submitting them.
- Greenwich faces the challenge of a significant level of new development, extensive areas of brownfield land (with a high cost of remediation), within a historic setting. Design Council has supported Greenwich for three years with independent expert advice on major schemes through a Design Review Panel, ensuring issues such as high-density, high-quality public open space and architecture are addressed to deliver high-quality development. The Panel has been involved in the design and planning of Greenwich Peninsula and Kidbrooke Village. Our design advice has built confidence in the authority since we started working with them in 2014 in how they shape and assess high-density proposals, leading to faster planning decisions.

3.64 We welcome proposals to amend the NPPF to ensure that density and form of development reflect the character, accessibility and infrastructure of an area. It is important that local planning authorities consider the appropriateness of the type, tenure, form and density of

proposed development in every location, reflecting local context and individual circumstances. This is especially important where the scale/size of development is out of character with the area or where there would be significant cumulative impact.

3.65 As set out in previous responses, infrastructure is vital for sustainable development. This is exacerbated in high-density development. All high-density planning decisions must demonstrate how development will support and be supported by both the physical infrastructure as well as the social infrastructure that creates quality of place that improves people's lives. Public, open and green spaces provide opportunities for sport and recreation, contributing to health and wellbeing and improve the quality of people's lives. They are a crucial infrastructure requirement and the government must not weaken the NPPF's requirement to provide them.

3.66 Minimum density standards (eg, for town centres or around railway stations) should reflect the character and circumstances of local areas. We do not believe this is something that should be set through national policy. Local planning authorities should consider as part of their Local Plan whether minimum density standards would be appropriate, for helping to drive ambition in areas of high demand and if so, in which locations, and at what levels they should be set.

Recommendations:

- Local planning authorities must adopt a proactive and strategic approach through their Local Plan to considering areas suitable for high-density development and whether minimum density standards could be useful in delivering their vision for the area.
- Local planning authorities must consider the type, tenure, form and density of proposed development, recognising that location and context make each development unique. Provision of necessary infrastructure is essential to ensuring that development is sustainable, with open and green space especially valuable in terms of improving people's health and wellbeing.

Q19. Do you agree with the proposal to amend national policy so that local planning authorities are expected to have planning policies setting out how high quality digital infrastructure will be delivered in their area, and accessible from a range of providers?

3.67 Investment and timely delivery of infrastructure unlocks housing growth by providing the fundamentals for places to grow and be successful (ie housing, transport links, commercial sites, culture, services). As set out throughout our response, well-designed infrastructure – both the physical infrastructure and social infrastructure - supports places to work better for those that live and work there.

3.68 Digital infrastructure is fundamental to the future of how we live and the communities we live in, as well as supporting the opportunities to rebalance the economy, supporting long term sustainable growth. By considering an area's digital infrastructure needs (and the opportunities presented by open data at city level alongside SMART technology), we can future-proof places and provide new ways of responding to challenges. Examples such as Future City Glasgow and the London Data Store show how design already plays a key role in several areas across the country in organising digital infrastructure to maximise possible insights from it – using data more and interpreting it better can help transform how we design and operate services. More needs to be done to help all areas across the UK realise these benefits. There is a challenge for industry to help local planning authorities understand the potential and benefits that high-quality digital and data can unlock and how places can be supported to achieve the maximum benefit it offers.

3.69 Local planning authorities must ensure they are planning for the high quality digital infrastructure that allows people to benefit from how technology is transforming how we live, and which creates opportunities for innovation and economic growth. High-quality digital infrastructure must be considered and planned for alongside all other infrastructure, not as an afterthought.

Recommendations:

- Industry needs to do more to help local planning authorities understand the impact and benefits that high-quality digital infrastructure and data can have on the communities and transform services, to allow local planning authorities to better consider and plan for its provision.

Q20. Do you agree with the proposals to amend national policy so that the status of endorsed recommendations of the National Infrastructure Commission is made clear?

authorities are expected to identify the additional development opportunities which strategic infrastructure improvements offer for making additional land available for housing?

3.70 The National Infrastructure Commission is vital to the planning of the strategic infrastructure needed to support the growth and competitiveness of the UK. The government should ensure that the recommendations of the Commission are given significant weight in the planning process (including through emerging strategic plans for elected mayors and combined authorities) to ensure timely and effective delivery of the infrastructure the country needs and that supports economic growth and rebalancing of the national economy.

3.71 The National Infrastructure Commission's Framework Document¹³ recognises the link between infrastructure and housing supply ("the Commission will also consider the potential interactions between its infrastructure recommendations and housing supply"). The government should strengthen the Commission's remit to give greater consideration to housing supply in supporting the country's economic infrastructure.

3.72 Strategic infrastructure schemes provide opportunities to support broader regional growth, through initiatives such as the Northern Powerhouse and Midlands Engine, and for new housing. For example, by ensuring new transport hubs such as UK Central at Solihull are integrated with local infrastructure, there are opportunities to unlock land, assets and opportunities for further growth potential. Local planning authorities must consider how strategic infrastructure connects and supports wider plans and strategies, and how it unlocks local potential, supporting delivery of their vision for the area. Design Council has worked with places across the country helping them use design to address local priorities and need, including local infrastructure requirements. Independent expert design advice is vital to support local planning authorities in considering how to maximise the potential from strategic infrastructure schemes.

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https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/585374/NIC_framework_document_web.pdf

3.73 We have a long track record of working with major national infrastructure providers to ensure nationally significant infrastructure projects are well-designed and provide maximum benefit and impact to local areas through our dedicated infrastructure design panel. Our insight and expertise working on schemes across the country such as Crossrail, Thames Tideway Tunnel and major bridge infrastructure in Suffolk and Merseyside, has helped deliver well-designed infrastructure that local areas need and which supports economic growth. Our guidance, *A design-led approach to infrastructure*¹⁴, sets out 10 design principles to help infrastructure providers create successful proposals which meet the criteria for good design set out in the National Policy Statement.

3.74 Design Council can support the government to realise the potential of national and strategic infrastructure schemes, through the national design review we provide, which can help identify solutions to unlock housing, regeneration and economic growth, to help rebalance the economy and build prosperity for all parts of the UK.

Recommendations:

- National infrastructure providers and local planning authorities must consider how infrastructure schemes can support wider plans and strategies and unlock potential for housing and economic growth.

Design for infrastructure

Design Council established a Design Review Panel for Thames Tideway Tunnel in 2011, advising on the design quality of the above ground works for 23 of the 24 sites. In addition to advising on each site (including how they related to their surroundings, heritage and place-making issues) we also advised on the vision and strategic objectives for the overall project. In 2016, we established a new Tideway Design Advice Panel advising on the permanent above-ground works and how to leave a lasting legacy of a first-class public realm.

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http://www.designcouncil.org.uk/sites/default/files/asset/document/A_design_led_approach_to_infrastructure_Ca be.pdf

A design-led approach to infrastructure

To ensure that the UK's infrastructure will continue to support economic growth and boost environmental efficiency, investment in national infrastructure is required. A design-led approach that takes geographical context into account will ensure these projects respond well to the setting, speak a confident, architectural language based on their purpose and function and allay concerns of local communities.

The NPPF states that “Good design is a key aspect of sustainable development, is indivisible from good planning and should contribute positively to making places better for people.” In particular, the NPPF identifies the value of design advice and support services, particularly at an early stage in the process to ensure good quality outcomes.

Our nationally recognised design guidance – *A design led approach to infrastructure*¹⁵ – sets out the key design principles for the development of well-designed infrastructure resulting from our extensive insight, derived from providing design advice and reviews of major schemes. Our expert multi-disciplinary design panels have advised on national infrastructure, major stations and interchanges, renewable energy farms and power stations, and flood management and defence structures.

Q30. What support would be most helpful to local planning authorities in increasing housing delivery in their areas?

3.75 The government should maximise the leverage of its funding to support local planning authorities to access design support and build their own design skills, knowledge and capacity.

3.76 In making funding allocations for the new £25m funding to help ambitious authorities in areas of high housing need, the government should take account of how local planning authorities are planning to embed high-quality design into their proposals. Funding should make provision for bidders to access design support to help them achieve this. The government should also look at what flexibility there is to support projects through the £2.3bn Housing Infrastructure Fund in delivering high-quality design.

¹⁵

http://www.designcouncil.org.uk/sites/default/files/asset/document/A_design_led_approach_to_infrastructure_Ca be.pdf

Recommendations:

- The government should maximise the leverage of its funding, such as new funding for areas of high housing need and the Housing Infrastructure Fund, to ensure it takes account of how local planning authorities are planning to embed high-quality design into their proposals, and to support them in accessing the design support they need in order to deliver it.