

26 July 2018 by Bryan Johnston

National Planning Policy Framework (NPPF) revisions emphasising the need for high-quality development have been welcomed in principle, but some question whether the government's aspirations are achievable in practice.



Design: new NPPF says 'creation of high quality buildings and places is fundamental to what the planning and development process should achieve'

"The creation of high quality buildings and places is fundamental to what the planning and development process should achieve." This unequivocal statement of intent, set out in paragraph 124 of this week's revised NPPF, appears to set the bar higher than previously in underpinning the government's heightened ambitions for achieving well-designed places.

In the same paragraph, further text introduced in the wake of this spring's consultation on the framework revisions, lays down more key messages. "Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities," it explains. "Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process."

17 things you need to know about the new NPPF

- Seventeen things you need to know about the final version of the revised National Planning Policy Framework (NPPF).
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As a high-level expression of support for excellence, these principles have been greeted enthusiastically across the planning and placemaking spectrum, tempered with uncertainty about how they will be applied on the ground. After all, the 2012 version of the NPPF made clear that permission should be refused for development of poor design - a message reiterated in the new framework. But that didn't stop many respondents calling for further clarity on measures to avoid low-quality applications being passed, the government's separate consultation response on the NPPF reveals.

"This new paragraph sends a very clear message that it is the government's expectation that design should be taken very seriously during the planning process," said Matthew Carmona, professor of planning and urban design at University College London and chairman of campaign group Place Alliance. The alliance was part of a consortium which voiced concern earlier in the year that the March draft was "far too timid" and failed to show sufficient leadership on design. "Ultimately, it is now up to local planning authorities to see that this is delivered, and this gives them the teeth they need. The key challenge they now face is to properly resource the design function of their planning teams. As we have consistently seen over many years, where local authorities prioritise design quality, they reliably achieve better results from developers."

Professor Stephen Gleave, an independent consultant and senior director at consultancy Turley, said the sector should be "positive" about the new emphasis on quality. "Advisers have a duty to highlight this with all clients, both public and private. It's a shared responsibility," said Gleave. "It has to be achieved throughout the design process, not just through bolting on so-called quality materials to the building form. Quality is achieved through the form, layout and character of new places at a structural level. This thinking costs little more but depends on design ideas and solutions that respond specifically to their locations. Trimming on quality should be unacceptable and the revised NPPF gives us the backing to reinforce this message."

But RPS director Mike Straw, voicing a personal view, warned that viability challenges and first-time buyers' inability to afford higher-quality products mean developers "don't have much wriggle room" to raise quality. "Few can indulge in high-quality design unless they are landmark developments aimed at high-end occupiers or investors," said Straw. "Design considerations are the Cinderella of planning. Many authorities have no or few planners with urban design skills and defer to design review panels who often cannot agree amongst themselves what is a good design. Despite the government's good intentions, design will tend to be standardised."

Elsewhere, the revised framework embraces some more detailed practical measures intended to drive up development quality. First, it offers a reminder that workshops to engage local communities, along with provision of advice, design review arrangements and assessment frameworks such as Building for Life, "are of most benefit if used as early as possible in the evolution of schemes". "I hope this call for early engagement with communities will encourage clients to embrace a collaborative rather than confrontational approach," said Clare San Martin, a partner at architects and masterplanners JTP.

Secondly, additional text in paragraph 130 of the new framework says planning authorities should seek to ensure that the quality of approved development is not "materially diminished" between permission and completion through changes to approved scheme, such as on materials. "Overstretched local planning authorities under pressure to deliver schemes quickly too often allow detrimental changes following consent," said San Martin. "A good design code developed with community and stakeholder involvement can be a really effective way of avoiding this."

Royal Institute of British Architects past president Ruth Reed, a director at planning and design firm Green Planning Studio, said effective pre-application consultation is the "key requirement" in improving scheme design. "Local authorities don't have enough resources to achieve that," said Reed. "You find that what's promised at application stage gets watered down. Often it's just holding local authorities to ransom. A lot of developers make a very good viability case to reduce standards,

but this policy will help councils stick to the quality of development that they want to achieve. It's telling developers that they need to get their sums right at the initial application stage."

Carmona added: "Many developers will use a high-quality design team to get planning permission and then abandon the team and engage in a round of value engineering to reduce costs, including using in-house teams for detailed design and delivery. So this warning in the NPPF is helpful, although it will be up to local authorities to take such matters seriously by following up permissions to ensure they are delivered as consented. In these days of austerity, that rarely happens."

Straw pointed to a shortage of enforcement resources as another factor in councils' inability to ensure that schemes are implemented in line with consents. "Some sites with permission are sold on to another developer who seeks to cut costs by amending the design. Also, councils are under pressure to deliver housing to meet their supply figures and may be prepared to consider amended design of a lower quality to hit their targets. They may not want to fight this, unless objections are raised by the public or councillors."

Gleave pointed out that fundamental changes to design and layout need to be resubmitted. "At this point, any diminishing of the original design objectives and commitments must be justified," he said. "One issue is that implementation of significant schemes occurs across the development cycle, with its highs and lows. Also, when materials are specified and approved, builders will always be chasing the market for the best price. The planning system must hold its ground in maintaining the standards set in the original approval. However, the test of what constitutes a "materially diminished" scheme may be subject to challenge. Setting standards for the very highest outcomes may see some compromise according to economic and social circumstances," he acknowledged.

Matt Shillito, a director at Tibbalds Planning and Urban Design, said the main issue will be to find the will and mechanisms to achieve quality on the ground. "Clear and robust local design guidance and encouraging the use of design codes is going to be more important than ever. Planning officers will need the capacity and skills to engage meaningfully in the design process," said Shillito. Getting the timing of design advice is essential, he added: "We regularly find that these tools are deployed or received when positions have crystallised, and are therefore perceived as obstacles to be grudgingly overcome." Tackling erosion of design quality between permission and completion will need much greater design officer capacity and expertise "to make the detailed, nuanced, case-by-case judgements needed for this to work as it should", he suggested.

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