Response:

Building Better, Building Beautiful - consultation response

31 May 2019

The [Building Better, Building Beautiful Commission](#) recently consulted on a range of questions about beauty and design in the planning process, including:

- Whether 'beauty' should be a broad objective of the planning process

- About various aspects of good design in residential development

- Methods for engaging local communities which can help secure support for development.

The Commissioners include [Mary Parsons](#), Group Director for Placemaking and Regeneration at Places for People. Mary is also one of the [Great Places commissioners](#).

The Federation's response to the consultation made the following key points:

- On balance, we would prefer a focus on good design in the built environment, rather than 'beauty'.

  Design includes elements of what might be considered beautiful - but covers a wider range of criteria for successful places. Many of those criteria are capable of consistent and objective measurement. While beauty is a strong and appealing concept it is also malleable and personal, tied up in varied and changing attitudes, fashions and prejudices. There is a risk its adoption would be counter-productive in practice.

- Housing associations have a good track record of well-designed development.

  We highlighted numerous examples of members' good practice in both the process and product of good design around the country, including award-winning schemes. We pointed the Commission towards the wealth of guidance on good practice in design, including our own - but noted also that there is often insufficient local or national incentive or requirement to apply it, leading to the sub-optimal outcomes sometimes associated with new development.

- Good design helps communities accept development.

  A recent RTPI survey found that almost 90% of respondents felt their experience showed good design helped communities accept development. We also highlighted the recent experience of resident ballots for regeneration schemes in London, where housing associations have been successful in securing high levels of support for their proposals.

For more information, please contact [Duncan Neish](#).

1. The Federation's response in full

Do you consider that securing 'beauty' should be a broad objective of the planning and development process - whether in the natural or built environment?

On balance, we would prefer a clearer focus on good design in the built environment.

This approach includes elements of what might be considered beauty but covers a wider range of criteria for successful places. Some of these are capable of consistent and objective measurement (although a level of subjectivity may be inevitable).

Beauty is a strong and appealing concept – but also malleable and personal, tied up in varied and changing attitudes, fashions and prejudices. There is a risk its adoption would be counter-productive in practice and we are reassured to see that the Commission's aims also appear to be more about the broader aspects of design.

There is a range of criteria important to good design. The Place Alliance recently found, through a review of 271 international studies, evidence indicating that high quality places add value with regard to health, social, economic and environmental outcomes. They did not find a definitive association with particular architectural styles but did very strong evidence of positive outcomes associated with: greenness; mix of uses; low levels of traffic; walkability; bikeability; compact and coherent patterns of development; and public transport connectivity. They also found strong associations - both positive and negative - with a wide range of other conditions.

There is no shortage of guidance on what is, and how to achieve, good design. The Federation publishes its own handbook for associations, and many of our member associations have their own guidance.

The 'Building for Life 12' approach also challenges those engaged in the development process to consider key criteria. These were originally developed by the Commission for Architecture and the Built Environment (CABE). Their material is widely considered to have stood the test of time and is worth revisiting.

Can you provide evidence of the best ways of creating homes and communities that have achieved …

a) sustainable and walkable densities

England's urban areas offer a range of recent good practice from which to learn. The best examples achieve not only high levels of sustainability and walkability but also successful mixed communities and support for social and economic facilities.

Such places are often achieved through, strong - positive and ambitious – planning, backed with good design requirements (including for density). An example of such a development – on a large scale – might be Places for People's development of the Brooklands new neighbourhood in Milton Keynes. The recent Brooklands Square element of the overall masterplan delivers a 50/50 mix of affordable and market homes plus retail and leisure space, creating a new local centre which will be the focal point of the new neighbourhood.

b) high levels of public support

A recent RTPI survey found that almost 90% of respondents felt their experience showed good design helped communities accept development.

People are generally more positively inclined towards processes affecting them when they feel informed and have the opportunity for meaningful involvement and influence. Tokenistic or 'tick box' consultation can have the opposite result.

A decisive form of influence is a specific vote on the proposed change. The prospect of such a vote will also focus the mind of developers on engaging and listening to local voices. The recent experience of housing associations undertaking resident ballots on estate regeneration in London has shown high levels of support in each case - particularly important where people's homes are being demolished and rebuilt.

Neighbourhood plans also appear to have secured high levels of public support through referendums. These are not ballots on specific development proposals – but should ensure plan-compliant developments are in line with community views. Production of such plans is an onerous process, however, and it remains to be seen how widely coverage will be achieved and how many plans will be updated when that need arises.

Examples of developments which have secured high levels of public support include:

- "The Guts" comprises 18 affordable terraced and semi-detached homes in New Islington, Manchester for Great Places Housing Group. Residents were involved in the design process and were represented on the decision-making panel for the choice of architect. The successful architects designed the development so residents would feel safe, secure and comfortable for the long term. This has resulted not only in strikingly spacious interiors, but in the effective orientation and layout of houses and streets. Ten homes were provided on a 'right to return' basis for residents of the area's former Cardroom estate.

- New affordable homes in an ancient village: Hastoe housing association worked with Rother District Council and Brede Parish Council – overcoming legal and site challenges along the way – to build 13 high-quality affordable homes in the ancient settlement of Brede for local families, enabling them to stay in their local community.

- Metropolitan Thames Valley housing association was successful in securing 75% resident support in the first mandatory London regeneration ballot. They shared emerging design ideas and sought feedback from residents on the replacement of 102 existing homes on a 1970s estate.

c) high levels of well-being

There are two broad aspects to this: firstly, the effect of individual homes, and - secondly – the nature of the broader neighbourhood.

The health impacts of poor quality housing have been considerably researched, and are central to the historical development of our town planning system. While widespread slum housing has been tackled, the UK's elderly and lightly-regulated housing stock (particularly in the private rented sector) remains implicated in health problems. The Building Research Establishment recently found that the direct cost to the NHS of homes in poor condition was £1.4 billion, with wider costs to society over ten times that.

Outside the home, the broader design of an area – such as density and layout, transport connections and access to greenspace – have important health implications.

Higher density development can support local facilities and services by providing a larger number of potential customers/users within a short distance, particularly via active travel (walking, cycling) or public transport. In addition to making services accessible to all, encouraging walking and cycling (and even public transport, which often requires walking to from stops/stations), helps people achieve the moderate levels of exercise associated with good health. Sedentary lifestyles are a major cause of the UK's diabetes epidemic, already associated with 10% of NHS expenditure and rising.

Over 60% of adults in England are overweight, in considerable part due to lack of exercise. Good health does not require gym sessions or vigorous sporting activity – regular moderate exercise is adequate (and accessible) for most people. Unfortunately, low density, car-dependent development with few local amenities do not encourage walking or cycling, or sustain viable public transport. There are many reasons why so much recent development has favoured car-dependency – but inadequate focus on design is one which can be easily addressed.

Maximising density is not always desirable: public and private greenspace has also been proven to benefit public health and needs to be included in design of developments, as do the differing housing needs of different groups. The key to good design is site-and-place specific application of principles, not a 'one size fits all' approach.

Public Health England is working with housing associations and others to test its 'healthy towns' principles in ten locations across England. The principles are:

1. Plan ahead collectively: work in partnership with local stakeholders and residents to co-create the new place.
2. Plan integrated health services that meet local needs: design and create health and care services for the future.
3. Connect, involve and empower people and communities: facilitate community leadership, decision-making and ownership.
4. Create compact neighbourhoods: design live-able, walkable new neighbourhoods.
5. Maximise active travel: make cycling, walking, and running as the 'go to' travel choices.
6. Inspire and enable healthy eating: ensure the physical and social environment makes healthy eating easy, affordable and fun.
7. Foster health in homes and buildings: design buildings and work with intuitions, such as schools and workplaces, to enable healthy living.
8. Enable healthy play and leisure: create a built environment and activities and opportunities which enable healthy play and leisure across the life course.
9. Provide health services that help people stay well: take a preventative and proactive approach to healthcare, such as prescribing to social rather than medical support.
10. Create integrated health centres: create health hubs which incorporate a range of support, including community organisations.

Finally, on this point, it is worth considering the contradiction between the (welcome) focus on good design of homes and places represented by the Commission's remit, and the complete lack of attention to such things in the relaxation of permitted development rights for creating new homes. Responses to the recent consultation on 'Supporting the high street' highlighted many examples of sub-standard homes and places: the Commission may wish to reflect on these when drafting its report.

d) environmental sustainability?

Environmental sustainability in the built environment is largely derived from:

1. The design of homes, particularly in energy efficiency and generation
2. The density and types of homes in a development.
3. The location and design of developments.

On (1), useful progress has been made on reducing carbon emissions associated with homes in recent decades, largely as a result of improved energy efficiency requirements. Much more could still be done, however, without pushing the limits of what it technically or financially viable.

On (2), higher density developments tend to be more environmentally sustainable for three reasons:

- They are more likely to be flatted or terraced designs with less external surface area relative to internal floor area, thus less heat is lost to the external environment (although with good insulation such losses can be minimised).
- As mentioned above, denser developments are also more likely to sustain services within comfortable walking and cycling distance, reducing the need for car use.
- Some larger-scale developments can support local heat and or heat and power networks, which may be more environmentally sustainable than piping gas to each home's boiler. In the medium term, gas will have to be replaced as a heating fuel source, however, so is perhaps not a good basis for comparison. Heat requirements for new developments should also be much reduced by greater energy efficiency, so the basis for assessing the sustainability (and financial case) of heat and power networks will change.

Finally, on (3), locating developments in existing urban areas, particularly re-using brownfield sites can also take advantage of, and sustain, existing provision of services, including public transport. Nevertheless, it is important not to fetishise brownfield development: even where available, such sites are not always in sustainable locations, and in some instances, developments on greenfield or green belt (which may also be brownfield) around existing settlements and transport connections may be more sustainable locations.

Do you consider that collaborative community and stakeholder engagement processes (such as planning for real, enquiry by design, charettes) are effective in securing more publicly accepted development? If so, at what stage of the planning and development process are they most effectively used?

See note above about mandatory ballots for regeneration schemes in London. All of these have – so far – been successful in securing resident support, including the aforementioned Metropolitan Thames Valley scheme. Other examples include:

- Hyde housing association secured 86% support for regeneration and densification of an existing estate.
- Riverside housing association's regeneration in Lambeth (Canterbury, Geoffrey and York Closes).

How ideally, could the planning and development process in England foster higher standards in design, over the long term?

There are many ways in which higher design standards could be more consistently achieved, most of which can be realised in a relatively *short* timescale.

- The planning system needs design to be given a higher priority, and planning authorities need greater capacity and capability to oversee standards.

  While the NPPF does emphasise the importance of good design, the critical criteria on which planning decisions are made tend to be focused on quantity (e.g. housing numbers), rather than quality. The Government could redress this imbalance in policy easily and quickly.

  The resources available to local planning authorities are inadequate to the task of creating a culture of good design. Planning has been hard hit by financial cutbacks, and 'optional' functions such as design and place-making have been hardest hit. Both officials and members need more support to understand and support good design.

- In the longer term, greater incentives for developers to complete and delivery on quality, rather than on quantity and financial grounds would elevate the priority afforded to design and quality. This might require a substantially different approach to development, particularly on large sites where achievement of public goods such as infrastructure, affordable housing and good design are seen as financial burdens to be avoided or negotiated down. Perhaps future control over large sites should not be decided by the developer willing to pay the highest amount to build standard products at a slow rate which preserves financial returns - but on the basis of bidders who offer the best solution to local needs and ambitions. Such an outcome would require a different, more ambitious role for local authorities and a change to the way land is typically traded in this country – but only to one which seems commonplace on the Continent.

- Greater competition and choice in the development market. The decline in the number of smaller private builders is well-documented but not much addressed. Access to land, and the complexity and uncertainty of the planning system are two major reasons why such developers struggle. But restoring their presence would provide alternatives to the market dominance of national firms, and could encourage better standards and diversity of design.

  Housing associations, who are dedicated to providing low cost accommodation and maintaining a commitment to places, also struggle to compete for land against private builders whose plans are based on maximising the most profitable developments and exiting. Strong policy on affordable housing and good design, and provision of a greater variety of sites through robust local plans would be helpful in the shorter-term – but more fundamental reform of the land market may be needed.

What first steps do you think the Government should take towards fostering higher standards in design through the planning and development process?

Government needs to resource the planning system adequately to develop and deliver robust local planning policy. This should include elevating the status of design criteria and processes, including making nationally described space standards (NDSS) a default expectation, with local authorities opting out, rather than each having to make the case to 'opt in'.

The proposed Future Homes Standard should make clear what is required in a well-designed home, providing confidence for developers and planners to invest in approaches which deliver such dwellings.

Government could endorse specific design guidance as having elevated status in the planning process – as noted, there is no shortage of such material to choose among. Local authorities report that the Planning Inspectorate (PINS) is reluctant to uphold refusals of planning permission for

reasons of design: PINS perhaps also needs clearer signals from the Government that good design is an essential element in the planning process.

Restrict the scope of Permitted Development rights to create large numbers of new homes without the requirement to consider all but very basic standards. There are many examples of poor quality development under the recent extensions of Permitted Development, and the Government has not ruled out further extensions. Its promised review should consider the questions posed in this consultation, among others.

The Government could provide clearer direction to Homes England to promote high standards of design as a condition of financial support. We would generally prefer to see standards mandated across all new development, however: social landlords seeking to provide low cost accommodation already struggle to compete for land against private developers who can pay more by seeking to minimise affordable housing requirements. Requiring social landlords to meet higher standards and develop lower cost housing would put them at a double disadvantage. Where better design requires higher costs, it would be better if these were met by reducing the price paid for land.