
RIBA submission to National Planning Policy Framework Consultation

February 2011

About the RIBA

The Royal Institute of British Architects (RIBA) champions better buildings, communities and the environment through architecture and our members. It has been promoting architecture and architects since being awarded its Royal Charter in 1837. The 40,000-strong professional institute is committed to serving the public interest through good design, and represents 85% of registered architects in the UK as well as a significant number of international members

Key points

- The RIBA very much supports the introduction of a new National Planning Policy Framework (NPPF) but believe that it should be recognised in statute and referred to within the Localism Bill.
- Sustainable development and good design should feature prominently in the NPPF and set out principles which will sit alongside locally derived policies and aspirations through both local and neighbourhood plans.
- PPS 1 sets out design in a way which is generally agreed to be helpful and any national policy ought to start there as a basis.
- The PPS 1 wording is largely right but poor quality schemes are still approved at planning. The key lever for change, therefore, ought to be how to put incentives in the system designed to foster and encourage good design.
- Guidance sitting alongside the NPPF should reinforce the importance of design and set out clearly, how those considering planning applications should assess the design quality of proposals (either plans or development schemes) to ensure that it fits with the definition in a local plan for sustainable development.
- The definition of sustainable development ought to be defined by local plans.

Background

The RIBA supports the Government's intention to establish a new National Planning Policy Framework and the desire to streamline the set of guidance and policy which has built up over a number of years. The NPPF provides a great opportunity for the Government to state more clearly, its overriding planning priorities and provide a strong steer for local authorities and neighbourhoods as to how to achieve its overriding economic, environmental and social objectives.

The RIBA's main objective is that the planning system helps deliver and does not hinder the delivery of high quality development, which enhances an area, helps stimulate investment and creates a lasting legacy for local communities.

The aspiration to achieve this already exists within legislation (introduced in the 2008 Planning Act) and in guidance (notably PPS1). However too many poor quality developments gain planning permission. The NPPF and the guidance which accompanies it, is therefore an opportunity to strengthen existing policy and be used to create incentives within the system for developers and planning authorities to promote good design and set out mechanisms by which it can be rigorously assessed.

“Good design”

Whilst aesthetics and the attractiveness of buildings, developments and communities are important, good design relates to a number of different dimensions, to how buildings and places work and how they meet the needs of the people who use them.

Good design delivers the desired outcomes to interested parties, including the local and wider communities. A good design will also be very buildable and use resources wisely: it will be able to be constructed on time, on budget and to the required quality. All of these benefits flow from good preparation and brief-making and investment in a talented design team.

Good design brings a range of benefits and in particular:

- **Good design brings value** - Good design creates tangible value. Buildings should enable occupiers to create value many times their cost and good design enhances occupier performance whilst lowering whole-life cost, thus creating a more valuable property. Good design also creates image, environmental, social and cultural value, enhancing wellbeing and reputation. The result should be a long-lived asset.
- **Good design helps support growth** - Good design helps drive growth, creating attractive places that work well and create an environment in which people want to live and in which businesses want to invest.
- **Good design is central to sustainable development** –good design ensures that:
 - Development has a responsible carbon impact over the course of its lifetime
 - A development functions well and meets the needs of the end user
 - Developments are flexible and are able to adapt to meet the changing needs of users. No development will be sustainable if it becomes surplus to requirements over a short period of time
 - Development has a positive social impact, encouraging social interaction and helps prevent crime. Development should enhance a community and not detract from it and it should create a legacy for future generations

Barriers and Bottlenecks: what are the current problems?

Poor quality developments still get through planning, and the system has in many areas failed to deliver good quality development and failed to win the support of local communities. There are a number of elements contributing to this problem:

- **Skills and capacity** – Decades of neglect have left planning departments under-resourced and skill levels – particularly in regards to design – are inadequate. The sharing of planning resources across local authority boundaries and the use of expert advice (such as design review) should be encouraged as a way of addressing this problem
- **Overcomplicated applications** - time, money, expertise and paper are currently wasted by the planners, developers and architects trying to navigate a risk averse and overcomplicated planning process. The Government should ensure that the complexity of application documentation is reduced, to re-focus the role of the planning process and lift the burden of those working within it.

- **Local Plans** – Local plans need to positively engage the public and be easier for communities and professionals to understand and interpret. Neighbourhood planning does provide an opportunity to address this, but it must be used to genuinely and positively engage people in creating a vision for their area, not be overly prescriptive and be used to foster aspiration amongst the local council and community alike.
- **External pressures** – In many areas, the desire for development and investment at any cost far outweighs the desire for high-quality development, causing long-term damage to the local area. Councils need the confidence and incentives to insist on quality and the NPPF should be used by the Government to state clearly the economic, social, cultural and environmental benefits of good design.

NPPF: Design Principles and Policies

We believe that existing guidance on design, through PPS 1, is helpful and its essence could be refined (and strengthened) through the NPPF. There are a number of guiding principles which we believe should underpin the Government's approach to design within the NPPF itself:

- Good design is indivisible from good planning, and it is an integral aspect of sustainable design. Well designed places and buildings are more likely to stand the test of time and avoid the wasting of resources.
- Good design is about more than appearance. Well designed buildings and places work well for those who use them; are sustainable, durable and adaptable; are accessible and inclusive; and are visually attractive.
- Designs for buildings and places should be of a high quality in their own right, and should be appropriate to their site and their wider setting, having regard to the existing natural and built environment.
- Good design will make a positive contribution to the overall quality and character of an area. Designs that do not achieve this should not be accepted anywhere.
- The quality of design of all aspects of the built environment is important: the spaces between buildings, including landscape, streetscape, highways and infrastructure design, as well as buildings.
- Local authorities should plan positively for the achievement of high standards of design, through spatial planning and through policies that reflect their statutory duty to have regard to the desirability of achieving good design.
- Those responsible for planning applications should be encouraged to engage designers, such as architects, with professional skills suited to the complexity and sensitivity of the task.

Presumption in favour of sustainable development

The proposed presumption in favour of sustainable development should send a clear message that development is desirable and should be encouraged and that the sustainability (in its various forms) of development is paramount.

However, the term ‘sustainable development’ has many different meanings and is a far-reaching concept. Whilst it is possible, therefore, to try to define this, we do not feel that it can be defined with sufficient clarity for it to be meaningful or hold sufficient weight within the NPPF.

We therefore believe that sustainable development should be defined by Local Authorities within Local Plans, to ensure that this reflects the local context and needs of a particular area.

Beyond the NPPF: what else is needed?

One of the main obstacles to the delivery of good design through planning is that it is a difficult thing to measure in an objective way. This therefore requires more subjective assessment, by those with the expertise and knowledge to assess its merits and also, for the individuals and communities who will use them.

At present, the planning system relies too heavily on development control and as such usually relies on a negative process of opposition to development often based on spurious design grounds as a method of rejecting schemes. We want to see a re-balancing of the system, to ensure that important design considerations are made before planning applications are submitted at the time when they can be altered and to ensure that local people and users of a scheme get the best out of it. It also frees up resource in the planning system at a later stage.

Therefore, in determining planning applications, having regard to the above policies, local authorities should be informed by a professional assessment of the design quality of proposals. Here too, the level of expertise should match the complexity of the design task. Design considerations and assessment can be best made pre-application

Design Review

Design review panels are a valuable means of assessing the quality of designs, and of serving to improve the quality of designs that come forward. Local authorities should be encouraged to make use of such panels. Panels should be operated in conformity with nationally recognised principles and procedures, set out in the joint guidance produced by CABE, RIBA, RTPI and the Landscape Institute. Panels should be consulted early in the design process, before a planning application is submitted.

Such panels are not a substitute for design skills within a local authority’s planning staff. Nor are they a substitute for public consultation. They should operate in conjunction with both, particularly where projects are significant or complex, or where designs are likely to be controversial or widely debated.

We believe that the advice of a design review panel should be made a material consideration at Committee. This would give design review greater weight and provide the incentives for developers to use the service, if they could be assured that their applications would not be turned down on spurious design grounds.

Design Charettes

We support the provision within the Localism Bill on pre-application consultation for significant developments and the use of collaborative methods such as design charettes. Design charettes are another positive tool in engaging communities in design and planning and achieving better quality development.

The Government should produce best practice guidance on how these processes should be conducted, particularly to ensure that they are representative of a local community and that they are led by professionals with the appropriate design expertise.

Neighbourhood planning

Although the NPPF should provide a clear and strong steer on the importance of good design at all levels of the planning process, we believe that the Government should produce guidance for neighbourhoods on delivering good quality developments. We believe that the Government also needs to ensure that local authorities provide the right support in this regard and ensure that neighbourhoods have access to the right professional expertise and local knowledge.

We would also like to see the provision on sustainable development and the desirability to achieve good design (Section 39 of the Planning and Compulsory Purchases Act 2004) extended to the neighbourhood planning process through the Localism Bill. We believe that it should be made clear in statute that neighbourhoods have the same responsibilities as local planning authorities in planning for well designed, sustainable development.

Further Information

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