

## **Consultation Paper on a New Planning Policy Statement 3 (PPS3): Housing**

### **Response by the Royal Institute of British Architects**

#### **Introduction**

The Royal Institute of British Architects welcomes this opportunity to comment on the draft Planning Policy Statement 3.

The RIBA is one of the most influential architectural institutions in the world, and has been promoting architecture and architects since being awarded its Royal Charter in 1837. The 30,000-strong professional institute is committed to serving the public interest through good design. It also represents 85% of registered architects in the UK through its regional structure as well as a significant number of international members. Our mission statement is simple—to advance architecture by demonstrating benefit to society and promoting excellence in the profession.

Our response responds to sections of draft PPS3 in the same order as they appear in the consultation document.

#### **Summary**

- Clear statements about the importance of ensuring design quality and environmental sustainability are needed
- An over-emphasis on process could jeopardise the quality of outcome
- Local Development Frameworks must recognise housing market realities and should reduce an over-reliance on outline planning permission which, so long as it is retained, should be used to minimise delays and uncertainty
- Parking policies should encourage reduced car use but recognise the need for parking space for those who choose to keep a car
- PPS3 should explicitly encourage the provision of a well-designed public realm
- Local planning authorities should recognise that properly trained developers i.e. architects bring a wide range of skills to schemes, and should employ officers qualified to give professional advice on design quality
- We oppose the application of design codes beyond the limited circumstances of masterplanning
- In the limited circumstances where design codes may be useful, they must be flexible and able to develop over time. Local planning authorities should work with architects alongside urban designers and other built environment professionals in the development of individual codes
- PPS3 should be used to encourage the provision of domestic renewable energy provision or energy efficiency measures
- The Government's proposals on density risk a predominance of small units containing very small spaces. Density should be measured by a ration of floor space to site area instead of dwellings per hectare

## The Government's objectives

It should be noted that the majority of new housing in the UK – particularly greenfield housing - is built without any input from architects. We welcome the Government's commitment to high quality design and its efforts, alongside the ongoing work of the Commission for Architecture and the Built Environment, to improve the quality of new housing stock.

As much new housing will continue to be built in the form of lower density greenfield development, we feel it is important that a clear statement of the importance of ensuring design quality should be more clearly set out as an objective for planning for housing. Planning Policy Statement 1 (Delivering Sustainable Development) states that planning should facilitate and promote sustainable and inclusive patterns of urban and rural development by, *inter alia*, ensuring high quality development through good and inclusive design, and the efficient use of resources. The document goes on to state that good design is indivisible from good planning. These are clear statements that should be repeated in PPS3.

Although the objectives include “the creation of sustainable communities”, the general issues of environmental sustainability and preparing for both mitigation of and adaptation to climate change are not given sufficient force in the draft statement. Planning for housing provision will play a critical role in response to these matters and they should be at the forefront of policy objectives. From such an objective will flow matters of quality of life, prioritising previously developed land, mixed use, density and accessibility as well as reducing car dependence and improving public transport. While these issues will be addressed by sustainability appraisals at regional and local level, we feel that it is nevertheless important that such objectives should also be clearly stated as national objectives at the top of the new PPS3.

## National planning policies

We would make the general point that the sections on Regional Spatial Strategies and Local Development Frameworks perhaps serve to emphasise the hierarchical nature of the planning system. While of course we accept that it is important to set out the respective roles of each component part of the planning system, an over-emphasis on process could jeopardise the quality of outcome.

## Allocating and releasing land for housing

We feel that the proposals for Local Development Frameworks do not deal adequately with market realities. It is essential for development that land is designated in a way that makes it possible for land to be acquired by housebuilders with reasonable certainty that development can be allowed. That would help speed up the market and make it possible for design time to be spent on new projects. At present, too much time and effort is spent on manoeuvring through the planning process with the consequence that the final design stage is only achieved at a time when funds and patience are low. The outline planning permission process has been useful in this regard, although well-prepared Local Development Frameworks should reduce an over-reliance on outline planning permission which, so long as it is retained, should be used to maximum effect by avoiding delays and minimising uncertainty.

Paragraphs 13-14 deal with the allocation of “windfall” land but would appear to relate only to circumstances where sufficient land allocations are impossible. In reality, the potential for “windfall” sites will always arise and good one-off sites should not be forbidden merely on the basis of housing land figures generating a “moratorium” as has been the case in some regions. We suggest that a presumption should be introduced that small-scale development will be acceptable when it is on brownfield land within urban areas and where no specific harm – such as traffic hazards or privacy infringements – can be identified. Such a presumption would streamline decision making by local planning authorities and release planning officers’ time for more valuable work.

## Efficient use of land

We welcome the encouragement of public-private partnerships in paragraph 17, provided that fair and proper procedures are to be adopted. The planning system must operate on principles of fairness and honesty, and transgressors should continue to be rigorously prosecuted.

Paragraph 20 states that local planning authorities should develop parking policies for their plan area. We regret the noticeably reduced emphasis on reducing car use in the draft PPS3 when compared with the previous version. Instead of proposing the development of parking policies that are led by projected car ownership levels, we suggest that the new PPS3 should re-emphasise the important objective of reduced car use, and promote and encourage provision for alternatives to private cars. Encouraging reduced car use is quite different from discouraging car ownership and there remains a need for recognition that space is needed for householders who choose to keep a car, even if it is little used in accordance with transport policies.

The statement in the previous PPS3 that proposals should “place the needs of people before ease of traffic movement in designing the layout of residential development” is certainly worth restating in the new document, as is the objective of seeking to “reduce car dependence by facilitating more walking and cycling, by improving linkages by public transport between housing, jobs, local services and local amenity, and by planning for mixed use.”

Paragraph 26 sets the indicative national minimum site-size threshold, above which affordable housing will be sought, at 15 dwellings. We welcome this clear statement of intent to provide a greater level of affordable housing and thereby more mixed communities and neighbourhoods.

## Designing for quality

We of course welcome the inclusion of this section, and in particular the stated objective of encouraging attractive environments which place people first.

While the draft recognises that streets and spaces are as important as buildings, we feel that PPS3 should explicitly encourage the provision of a well-designed public realm. It is the mix of buildings, green spaces and streetscape – alongside other factors such as traffic – that is so crucial to the quality of residential environments.

It is easier to prevent bad design than it is to ensure good design quality, and it should be recognised that good design is most likely to be achieved when good designers are employed. We do not say that hiring an architect *per se* is a guarantee of design quality, but there should be some recognition that properly trained developers i.e. architects bring a wider range of skills and considerations to a scheme than those without any form of architectural training. We would support a form of words along the lines of those in the 1988 version of Planning Policy Guidance 1 which stated that “authorities should be closely guided in such matters by their professionally qualified advisers. This is especially important where a building has been designed by an architect for a particular site.” To this end, it is particularly important that local planning authorities employ officers qualified to give professional advice on design quality.

### *Design codes*

Much of the attention within the architectural profession to draft PPS3 has been drawn to design codes. We urge the Government to proceed with great caution with regard to this area of PPS3. We believe that design codes are only appropriate in the context of a comprehensive masterplan for a specific development site. We oppose the application of design codes beyond these limited circumstances.

We accept that design codes may offer opportunities to set out principles of good design for those developments which have not been designed by a suitably qualified architect. Design codes should only concern themselves with objective urban issues such as form and public realm, rather than subjective architectural issues. They should only be applied to individual buildings to the extent that they define the public domain.

Not all developments will benefit from the theory that, in the right circumstances and with the right expertise, design codes can speed up the planning process and deliver excellent results through the full collaboration of local communities, designers and planners. There is a clear danger that design codes could be produced in such a way to encourage simplistic, formulaic or pattern-book design. PPS3 must draw attention to these potential drawbacks.

In the limited circumstances where we believe that design codes may be useful, they must be sufficiently flexible to enable innovation and excellence, and develop over time lest they become a dead hand or a recipe for unacceptable conformity. Design codes are only as good as those who prepare and apply them. Expertise is needed, and there is clearly a potentially major role for architects in their development. We suggest that PPS3 should state that local planning authorities should work with architects alongside urban designers and other built environment professionals in the development of individual codes as part of the masterplanning process.

### **Greening the residential environment**

The draft needs to be more careful in defining “green”: the open space referred to in open space in paragraph 38 will not always be green – for instance children’s play areas or sports facilities. But more potentially confusing is the way the draft mixes the use of “green”, meaning landscape and open space, with “green” meaning environmentally friendly. The entire document is a complement to PPS1 (Delivering Sustainable Development), yet the issue of environmentally friendly design and construction is relegated to paragraph 39, and is subsidiary to the issue of landscape.

The RIBA views with concern the separation of the idea of “greenness” in the environmental sense from the main thrust of delivering sustainable communities and quality of life. These objectives should be integral to each other. As noted earlier the key issue of planning housing provision for environmental sustainability is not expanded on at all in the later parts of the draft statement.

PPS3 is a valuable opportunity to Government to require local planning authorities to encourage the provision of domestic renewable energy provision or energy efficiency measures. Local authorities are themselves major landowners and developers and as such can lead the development of sustainable communities. We propose that where land owned by local authorities is developed or sold for housing, authorities should themselves be obliged to use that development to pioneer sustainable design and construction techniques.

We will be addressing this issue in more detail in our response to the ODPM consultation on the draft *Code for Sustainable Homes*.

## Managing delivery and development

Paragraph 41 is pleasingly open-minded and the criteria – in particular the requirement that the planning proposal makes an efficient use of land, offers a good housing mix, is of high quality design and does not have an unacceptable impact on the environment – is well-expressed. It would encourage developers to use initiative and would help to achieve the Government objective in paragraph 1(b) of delivering a better balance between housing demand and supply in every housing market and improve affordability.

## Annex C: Density

It is noted that Annex C re-emphasises the need for higher densities. There is a risk that an unsophisticated reading of the guidance could encourage developers to place pressure on architects to deliver designs which meet maximised density targets irrespective of local site conditions or constraints. The result is a predominance of small units containing very small spaces, and “ghettos” of 1-2 bedroom units on inner city sites. The current measure of dwellings per hectare is too simple and allows developers to achieve a high density rating through the provision of dwellings that are too small for many people. We believe that density levels must be set at a fine grain and guided by spatial strategy and, when appropriate, spatial masterplans. We support the call by the Commission for Architecture and the Built Environment for density to be measured instead by using a ratio of floor space to site area.

We do not, however, dispute the objective of raising density levels in many areas in order to prevent unnecessary sprawl and create attractive, vibrant communities. But we suggest it will not be possible to achieve the higher densities envisaged by the Government without an acknowledgement that a shift to higher densities is not only acceptable but also desirable in suburban areas. Without such a statement, we fear that local authorities will continue to refuse planning applications with higher densities and Planning Inspectors will similarly dismiss appeals because of a perceived change in the “character” of existing low-density housing areas.