

Building Better, Building Beautiful Commission: Call for evidence

The Royal Institute of British Architects champions better buildings, stronger communities and higher environmental standards through the practice of architecture and our 40,000 members. We provide the standards, training, support and recognition that put our members –in the UK and overseas –at the peak of their profession. With government and our partners, we work to improve the design quality of public buildings, new homes and new communities.

The RIBA welcomes this call for evidence. We are committed to driving up standards and improving the quality of the built environment.

To promote high-quality design for new build homes and neighbourhoods, the RIBA recommends that the Government:

- Urgently addresses the resource gap in local authority planning departments, particularly the shortage of qualified design expertise.
- Mandate the use of Post Occupancy Evaluation for any housing projects that receive public funding.
- Undertake a review into procurement through design and build contracts to address the risks and shortcomings that this creates in new housing. This should include ensuring that design architects are retained throughout a project, at least in a 'design guardian' role.
- Support the recommendations of the Letwin Review relating to capping land values and mandating the parcelling up of large sites.
- Allow local authorities to mandate the use of design review for projects which meet agreed criteria.
- Make the Nationally Described Space Standard and M4(2) Category 2 of the building regulations the minimum standard for all new housing.
- Put an immediate end to the delivery of housing under permitted development.

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

Beauty is an objective of architecture. However, it is only one element of creating a successful building or place. Architecture brings together the diverse requirements of a site to create something which is both functional and beautiful. This role has been recognised by the Secretary of State for Housing, Communities and Local Government describing architects as “guardians of quality”.

Beauty must be incorporated into a broader definition - quality design - which is focused on securing positive outcomes for the people that will use and interact with the place. This can only be achieved through improving the planning and development process, not being prescriptive about the style of new development. Raising standards, improving the resourcing of the planning system – particularly design expertise – and properly assessing the as-built performance of buildings will be far more effective solutions to the problem of poor-quality housing.

The RIBA has conducted research into user needs that reveals the characteristics that will deliver these positive outcomes in housing. These include generosity of space, high ceilings, windows that flood principal rooms with light and detail that adds character¹. Local context is also crucial in determining what will be considered beautiful in a particular area, meaning designs should be developed in conjunction with local communities to ensure that local insight is embedded into new development. Preservation of local character is important but the NPPF is explicit in stating that this cannot come at the expense of innovation and sometimes necessary change (such as allowing suburban intensification). Local communities have a central role in formulating the change in ‘character’ or local context in the certain instances where it is required.

In our recent report on delivering successful placemaking, the RIBA established ten characteristics of well-designed and attractive places, which put quality at the centre². This includes promoting mixed communities through a variety of housing tenures, with development taking place in the right places, in close proximity to proposed or existing infrastructure and essential local services. This is central to sustainable development and what the planning process should be set up to achieve; well designed, sustainable new places with strong communities.

If the purpose of the Commission is to meet the needs and aims of communities, and deliver positive engagement with the planning system, it must take a holistic approach improving design quality, rather than a narrow, prescriptive focus on aesthetics and architectural style.

2. Can you provide evidence of the best ways of creating homes and communities that have achieved a) sustainable and walkable densities b) high levels of public support c) high levels of well-being and d) environmental sustainability?

As referred to in the response to Question 1, the RIBA recently produced a report on delivering successful placemaking, which identified ten case studies that all met a set of criteria identified as being essential to quality places. These cover the four categories identified above.

While all are different in many ways, there are consistencies that resonate across numerous of the case studies. A commitment to higher design standards was consistent, with many of the developments adhering to various industry standards that are often optional for developers (Building for Life 12, Lifetime Homes, Code for Sustainable Homes). Design governance

¹ <https://www.ipsos.com/sites/default/files/publication/1970-01/sri-riba-the-way-we-live-now-may-2012.pdf>

² <https://www.architecture.com/-/media/gathercontent/ten-characteristics-of-places-where-people-want-to-live/additional-documents/placeswherepeoplewanttolivepdf.pdf>

approaches such as design review and masterplans with design coding are also important tools for securing better standards of design through the planning process.

It is equally crucial to have the necessary conditions in place to foster high quality development. This includes enlightened leadership from both the client and the local authority to deliver on a shared vision. The current housebuilding model often fails to deliver successful places because it is built on a short-term model of maximising profits, without consideration for how to achieve lasting value for the occupants. Design and sustainability are relegated as secondary to driving down costs, often in bid to increase developer profit and/or value for landowners.

Such failures should be mitigated through the planning system. However, local authorities are not adequately resourced to carry out their role in proactive planning. The sector and government are aware of the lack of design expertise within local authority planning departments, without which enforcing new approaches to improving design standards becomes near impossible. Without more investment in the planning profession to help develop, recruit and retain the required expertise and capacity within local authorities the issue of poor quality will persist. Initiatives like Public Practice are helping to provide innovative solutions to capacity building.

It is also important to recognise the continued failure to measure how successful homes and communities are created. Without Post Occupancy Evaluation (POE) to determine the performance of what is being built, there is very little understanding of how buildings are performing against their design objectives. Mandating the use of POEs on all projects that receive public funding would develop an evidence base for government from which to understand how to improve the quality of new development. This should be considered a priority, and also include the impact on social sustainability of a development through assessing the well-being of occupants. This aligns with the emphasis on the need to demonstrate social value through government procurement in the Social Value Act 2012.

There has also been excellent work undertaken previously by government agencies on how to develop successful places. The Urban Design Compendium³ published by English Partnerships (now Homes England) is one such example, and much of the work of the Commission for Architecture and the Built Environment (CABE) is still relevant today.

3. Can you provide evidence of ways of creating homes and communities in other countries, which have been successful in achieving a) to d) in question 3?

As with the above question, the following examples of successful places had a focus from the beginning on delivering quality placemaking outcomes combined with strong leadership underpinned by a clear vision.

In addition, the RIBA International Prize held every two years identifies examples of high-quality design from other countries⁴. The RIBA would be happy to provide more information to the Commission on any of the previous award-winning developments that are of interest.

Hammarby Sjöstad in Stockholm, Sweden

An urban extension of 11,000 homes which is widely regarded as an exemplar in delivering a new, sustainable urban community on brownfield land. The local authority oversaw the project from conception to construction, including land assembly, infrastructure planning and masterplanning.

³https://webarchive.nationalarchives.gov.uk/20170130165337/https://udc.homesandcommunities.co.uk/urban-design-compendium?page_id=&page=1

⁴<https://www.architecture.com/awards-and-competitions-landing-page/awards/riba-international-awards>

The local authority produced a strategic masterplan for the overall site in-house, which was divided up into numerous sub-districts with a masterplan drawn up for each area. The local authority agreed partnerships with developers and architects for sub-districts and established design codes in collaboration with the private sector. This ensured harmonious design across the entirety of the development while providing enough flexibility for varied and creative design. In addition, sub-districts were divided into smaller sites to prevent dominance of any single developer which created greater depth of character across the entire site. The local authority also delivered 30% of the site through local housing companies.

Homeruskwartier, Almere Poort, in the Netherlands

A 250 acre urban extension to the south west of the city of Almere. The entire area was masterplanned by the local authority which was also responsible for delivering the necessary local infrastructure. The site is divided into various districts supporting approximately 3,000 self-build homes. The different districts are themed to cater for different preferences/needs, with examples including live/work homes, high end sustainable homes and plots with large gardens. The plots have been sold at a fixed price based on the market. Affordable homes are also available through shared ownership. The freedom provided to owners of individual plots to design their own home has created an environment of architectural diversity and innovation while creating a sense of community.

4. 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?

Public engagement is an essential part of the planning process. Failure to effectively engage local communities and stakeholders in new development has led to a breakdown of trust in the planning process. There is often scepticism towards developers and a lack of belief that local engagement can influence outcomes.

The tools referred to such as charettes and planning for real can be very useful in developing a better sense of community ownership over plans and therefore making housing more acceptable locally. The RIBA would welcome greater use of these tools in the planning system as they are often far more extensive than the consultation that does take place on large scale developments.

However, it is crucial to recognise that the processes followed are less important than ensuring that engagement takes place at an early enough stage for communities to genuinely influence the design of proposals. This should be as early as possible, at the very initial design concept stages or even at the stage of formulating Local Plan policies and Supplementary Planning Documents, before major design decisions have been made. The Village Design Guides being developed in South Cambridgeshire provide good examples of this.⁵

Often consultations are viewed as tokenistic as decisions around density and massing are already near fixed by the time local residents first have an opportunity to input. This is far too late in the process to influence change. Acceptance of the need for more housing across the country is becoming more widespread and the need for more housing continues to rise up the political agenda. RIBA members have found that communities and local stakeholders are often understanding and pragmatic about the need for new housing if they feel that they have a say in the way that plans are developed.

Neighbourhood planning is a good example of this. There has been growing engagement in the neighbourhood planning process from communities demonstrating a willingness to have more

⁵ <https://www.scambs.gov.uk/planning/local-plan-and-neighbourhood-planning/village-design-guides/>

of a say over how development comes forward in their areas⁶. This is undermined if unexpected development is then allowed to come forward which is entirely out of line with the community's plans. Likewise, the neighbourhood planning process needs to be properly resourced to help Neighbourhood Plan Groups understand how to find positive solutions for where new development should go.

A separate concern with existing engagement processes are that they are not always inclusive of hard to reach groups, such as minority groups or young people and more should be done to promote widespread participation. Neighbourhood Planning again provides a useful example of this as more deprived areas are far less likely to engage in the neighbourhood planning process than affluent places.⁷ Consultation should make better use of the digital tools available to make plans more accessible to people without experience in planning, and capture comments through the consultation process that can be fed back into the design process and used to compare how proposals have been shaped by feedback.

It is important to note that development is far less likely to be acceptable, regardless of consultation, if existing communities feel that it will negatively impact their lives. It is equally important that new development gives priority to localised investment in new transport and social infrastructure, including schools and play space. This ensures that development will not put a strain on existing facilities.

5. Can you provide evidence on the benefits and problems associated with introducing, and enforcing, design methods such as master-plans, design briefs and design codes, in the creation of homes and communities?

There are numerous examples of the positive use of design guides and masterplans with design coding in the case studies detailed in the RIBA's placemaking report. For example, St Chads in Tilbury, designed by Bell Phillips Architects for Thurrock Council, drew on the principles set out in the Essex Design Guide⁸. The RIBA would be happy to arrange for commissioners to visit projects that have successfully used the design methods listed to demonstrate the benefits that they can provide.

Further examples are also detailed in a newly published report, Distinctively Local, authored jointly by four RIBA chartered practices (HTA Design, Pollard Thomas Edwards, Proctor & Matthews and PRP)⁹.

While useful tools, there can be a risk of such methods being too prescriptive. They should not serve to prevent creative architects from establishing innovative solutions for sites. They must allow for interpretation and responsiveness to the local market. It is therefore imperative that they are put together by an experienced and qualified team with the adequate expertise.

While these are valuable tools for raising design standards, the question of enforcement is an important one. There needs to be the necessary design expertise and capacity within local authorities to see design governance approaches realised. Without this, there is a lack of qualified oversight to ensure development adheres to set standards. The design methods referred to cannot serve as replacements for qualified design expertise.

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

Resolving the prevalent issue of poor-quality development requires investment in the planning system and a greater role for expertise in the development of new housing. The vast majority of

⁶[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/801804/Neighbourhood Planning Newsletter May 2019.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/801804/Neighbourhood_Planning_Newsletter_May_2019.pdf)

⁷ https://lichfields.uk/media/4128/local-choices_housing-delivery-through-neighbourhood-plans.pdf

⁸ <https://www.essexdesignguide.co.uk/case-studies/st-chads-tilbury-mix-development-for-private-and-affordable-housing/>

⁹ <http://www.distinctively-local.co.uk/storage/app/media/Distinctively-Local-Fnal-Report.pdf>

new homes never see the inside of an architect's studio. The government's current approach to increasing housing output does not adequately recognise the social and financial value of good design. To improve this the government should actively promote the use of architects in the design of all buildings, including housing. Design of the built environment should also form part of the primary school curriculum and continue to be taught throughout secondary education.

Local authority capacity

In the longer term, the Government needs to invest in building up the capacity of local authority planning departments, particularly with qualified designers. Numerous assessments have revealed that there is a concerning lack of specialist design expertise within local government¹⁰
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This is problematic as local planning authorities are often unable to engage in proactive planning, which is necessary to properly establish an ambition for an area or neighbourhood. Instead of proactively engaging with design teams, local authorities are often reduced to reactively responding to planning applications once submitted. As well as resulting in poorer outcomes in design, it also creates substantial delays to the planning process as issues are only identified late in the process.

There is an important distinction between authorities that have an officer that deals with design and those that have access to qualified design professionals. Research carried out by Place Alliance revealed a reliance in local authorities on using professionals without a design background to provide design related advice, such as planners and conservation officers¹². This is no substitute for trained architects and is not enough to achieve positive design outcomes through the planning system.

Tools like design review can help to make up for the shortage of in-house expertise. However, they are no substitute for a properly resourced planning system. This is particularly true if the government expects local authorities to begin delivering new social housing at scale following the lifting of the local authority housing revenue account borrowing cap¹³. To reduce delays to the planning process and improve the quality of new housing, the government urgently needs to address the resource gap in local authority planning departments.

The RIBA has launched its own programme jointly with CIH, LGA, Homes England and RTP1 to help meet this challenge. The Future Place¹⁴ project aims to unlock place-making potential at a local level through quality in design, future thinking, and knowledge sharing. The programme has been designed to promote best practice and the potential of innovative delivery, design and funding models, cross-sector collaborations, capacity building, and knowledge sharing at a local level.

Post Occupancy Evaluation

We currently have a very poor understanding of how buildings are performing against their original design intentions. The planning process places an emphasis on securing forms of quality up to determination, but has insufficient resources to enforce whatever design standards are agreed at planning determination. It is well understood that there is a performance gap between the design intentions of homes and their as-built performance. POE is crucial in measuring the performance of new homes and providing the data needed to understand where improvements can be made. POE needs to become a normalised part of the development process, including understanding the long-term impact on well-being from the people who live in the homes and places being designed. Government has a central role to play in this by mandating the use of POE for any housing projects that receive public funding.

¹⁰ https://www.london.gov.uk/sites/default/files/placeshaping_capacity_survey_2018_web.pdf

¹¹ <https://www.architectsjournal.co.uk/news/fall-in-number-of-architects-working-for-local-authorities/10040489.article?blocktitle=news&contentID=19633>

¹² http://www.udg.org.uk/sites/default/files/uploads/Design_Skills_in_Local_Authorities_2017_final_draft.pdf

¹³ <https://www.gov.uk/government/news/government-announces-new-generation-of-council-housing>

¹⁴ <https://www.architecture.com/campaign/futureplace>

The RIBA is already working to improve this by embedding POE into the Plan of Work. Last year we also published the Quality Tracker in partnership with the Chartered Institute of Building (CIOB) and the Royal Institution of Chartered Surveyors (RICS) which aims to improve the quality of outcomes in the construction industry. We would be happy to have further discussions with Commissioners about this work.

The Government should also explore the potential benefit of a single point of sign-off for new development. This would be a completion certificate that requires the joint signatures of the planning authority officer and building control to demonstrate that the development has been completed in accordance with the planning permission and to the satisfaction of the local planning authority.

Letwin Review

The RIBA supports the recommendations of the Letwin Review to cap land values and capture more of the value of development for local investment. Mandating the parcelling up of large sites into smaller sites would also provide much needed stimulus to the housing market by opening up more opportunities for SMEs. The proportion of homes being delivered by SMEs has not recovered since the financial crash, meaning the market is dominated by a small number of volume housebuilders delivering largely homogenous housing products. This lack of variety has had a detrimental impact on the quality of new homes being built, with housebuilders having little incentive to invest in improving their product.

Procurement

The way that housing projects are procured in this country is having a detrimental impact on the quality of new development. The continued rise in the use of Design and Build contracts¹⁵ often leads to the concept design architect being replaced once plans receive planning permission. This is usually tied into a process of 'value engineering' in which elements of the design are stripped back in a cost saving exercise. This failure to prioritise quality over cost is not just reducing satisfaction in new housing but compromising the safety of residents. This method of procurement should be reviewed by the Government and steps taken to address the risks and shortcomings. This should include ensuring that design architects are retained throughout a project, at least in a 'design guardian' role.

Sustainability

The RIBA welcomes the Government's recent announcement of a Future Homes Standard to 'future-proof' new homes. However, given the pressing need to improve the sustainability of the built environment¹⁶, the Government should urgently reconsider its timeframe for this policy and seek to introduce the new standard long before the target implementation date of 2025.

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

Government could make better use of the available design governance approaches to raise design standards. For example, the Government should allow local authorities to mandate the use of design review for projects which meet agreed criteria including size, height, density etc. In the absence of trained architects in local authorities, which is the current reality for many places, design review is crucial. It is also important it happens as early as possible in the design process where feedback can be most meaningful in influencing design. The RIBA recently produced a toolkit detailing method available through the planning system for raising design standards¹⁷ and would be happy to discuss this in further detail with the Commission.

¹⁵ <https://www.thenbs.com/knowledge/national-construction-contracts-and-law-report-2018>

¹⁶ <https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/>

¹⁷ <https://www.architecture.com/-/media/gathercontent/work-with-us/additional-documents/designmatterspromotinggooddesignpdf.pdf>

The Government should also put an immediate end to the delivery of housing under permitted development. In particular, office to residential conversions have resulted in the development of demonstrably substandard housing since the policy was introduced. The current permitted development policy is not compatible with the Government's stated aim of improving design standards through the planning and development process. In cases where employment space is redundant and suitable to be changed to housing proposals should be subject to a planning application and receive appropriate scrutiny from the local planning authority.

The Nationally Described Space Standard should also be incorporated into building regulations to provide a fair offer across the country. Various research has shown that the amount of space is a key trait that people value about a home¹⁸. Incorporating the space standards into building regulations so that they apply universally would give developers certainty and allow extra cost to be borne out of land values. Category 2 of Part M of the building regulations should also become the minimum standard for accessibility in all new homes to help rectify the poor accessibility of the current housing stock (currently just 7% of homes are accessible)¹⁹ and the pressing requirement to meet the needs of an ageing population.

As a standard that is already supported by the Government, tools such as Building for Life 12 should also be advanced more, potentially by requiring their inclusion in local plans.

¹⁸ <https://webarchive.nationalarchives.gov.uk/20110118105130/http://www.cabe.org.uk/files/space-in-new-homes-residents.pdf>

¹⁹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/539541/Adaptations_and_Accessibility_Report.pdf