

A Commentary on the design bits of PPS3

This new PPS sets some pretty strong design policies. Some reinforce PPS1, but there are also other, new requirements set.

Some people see a clear link between the Government calling for better design, and the government calling for more homes to be built. They suggest that the design agenda is just there to sweeten the growth agenda. This is not proven, and there is logic in the requirement of good quality homes – consumers want them and our environment needs them. But, even if you do believe design is a sop for growth, it is better to have lots of good quality, well planned new homes than lots of poor quality, badly placed and serviced new homes!

To help, this commentary paper looks at what the PPS says on design, what this might mean and how you can implement the new policy. It comments on the following PPS sections:

- Strategic Housing Policy Objectives
- Planning for Housing Policy Objectives
- Achieving high Quality Housing
- Achieving a Mix of Housing
- Identifying Suitable Locations for housing Development
- Effective use of Land
- Local Monitoring and Review

Para 9 - Strategic Housing Policy Objectives

What does it say?

The PPS calls for decent homes, provided where people want to live.

What does this mean?

This sets two basic tests, the need for a high quality product, and to build it in the right place. Achieving just one of these will not be enough. Both require good design, but in different ways. A well designed home will be fit for purpose. It will offer sufficient living and storage space, both internal and external, privacy, light, air and peace. It will also ensure an efficient use of resources, for example by accommodating the various recycling bins now needed. Whether occupiers value it or not, a decent home should be environmentally responsible and aim to be 'carbon neutral'.

Getting the homes in the right place requires good spatial design and masterplanning looking at layouts and links to other land uses, services, facilities, etc. This is more than looking at a local PTAL score and so deciding how many homes to build on a site. Good spatial design requires real 'spatial planning'. Basing your priorities on housing numbers will not create places people want to live. But linking those homes with schools, jobs, shops, sports centres, parks etc in a logical and practical way will help to create desirable neighbourhoods.

What should you do?

1. Make sure everyone involved in planning for housing understands the twin design requirements and that your systems, resources, priorities and decisions reflect the PPS where appropriate.
2. Use the LDF process, and in particular Area Action Plans, to ensure all new homes are built in the right place, or that the places where they can be built are actively made into the 'right places'. This means basing your policies on good masterplanning. Without such a process you are unlikely to meet the requirements of PPS3. (CABEs guide to good masterplanning may be particularly useful here).

Para 10 - Planning for Housing Policy Objectives

What does it say?

Number 1 in the list of the PPS's planning objectives is:

'high quality housing that is well-designed and built to a high standard'.

You can't get a much stronger endorsement for the need for good design than this. Other objectives relate to housing numbers, tenures, price etc. But as with para 6 both the quality of the unit and the quality of the spatial planning is covered. So the PPS requires:

'housing developments in suitable locations, which offer a good range of community facilities and with good access to jobs, key services and infrastructure.'

What does it mean?

Two of the most important words in this paragraph are 'well-designed'. This relates to a process not just a product. Achieving good quality homes in good quality neighbourhoods is not easy. It requires a lot of thought, negotiation, balancing and, of course, designing. It may be that standard house types and layouts can be appropriate, but only where there is a conscious decision that they work based on an assessment of the site and its context, and an evaluation of that assessment to inform the design. To meet the PPS's objectives all new housing must be based on a robust design process where decisions are constantly made from schemes conception right through to occupation.

What should you do?

1. Make sure proposals are based on a well thought through and executed design process. (This is explained in By Design). Check that the scheme has been 'designed' not simply proposed. You should be able to use design and access statements to check this, but you might want to make it clear to developers what you will be looking for and expecting.
2. Use conditions, legal agreements, and approval of reserved matters to make sure the original design principles and objectives you approved are taken right through to occupation and management. Many good drawing board schemes end up as poor built places due to a succession of small changes made after permission was granted. These water down and skew the original proposal.

Paras 12-19 - Achieving High Quality Housing

What does it say?

Much of this section reiterates PPS1 policy. So once again we are told that proposals should be making places better for people and take opportunities to improve the character, quality and functioning of the area.

But PPS3 goes into more detail than PPS1. It promotes sustainable homes, and suggests the use of the Code for Sustainable Homes as a tool, and calls for 'innovative' designs to help create better places. PPS3 also lists things to consider when assessing design quality. These are similar, but not identical, to the questions in Building for Life. The list should give a good starting point to help implement the PPS's overall design objectives.

There is mention of the need for open space, both private and public, particularly for family housing and children. This may be recognising that many new housing development just don't allow people to 'breathe', socialise or exercise. Open space is not only important for resource efficiency and biodiversity, but for the health and well being of future occupants.

A big change is the requirement for local authorities to monitor quality (para 19).

What does this mean?

The reiteration of the need for good design is clear and expected. It should not, technically, make a big difference if PPS1's design policies are already being used. But PPS3 provides the start of a tool kit to help implement the key policies. The list of design considerations and the requirement to monitor quality should make the implementation of the PPS1 policy more consistent and practical.

PPS3 asks for changed practices in planning departments. If local policies and decisions are to be consistent with the PPS, a regime of quality monitoring will need to become common practice. It could be argued that if local authorities are not already assessing the quality of new housing schemes, in line with PPS1, what are they doing? But in reality PPS3 puts more pressure on authorities to ensure staff have the skills, resources and backing to require good design.

What should you do?

1. Refuse new housing schemes that are not well designed and do not take improvement opportunities.
2. Accept that design can and should be assessed in an objective way. Ensure you adopt a consistent assessment tool, based on the issues covered in the PPS. But remember this is not an exhaustive list, and you can add issues if you wish. Have a look at the Building for Life assessment tool (referenced in the PPS) and see if this will suit your

needs. Or adapt it to meet your circumstances and objectives. Make it clear, in policies, how you will assess housing quality.

3. Remember that you are being asked to monitor the quality of schemes given permissions, so a consistent, recordable assessment at the application stage will help you do this. CABE is doing research into effective monitoring, but for the time being basic 'scores' based on an assessment tool, like 75% of design requirements fulfilled, could be recorded on your application databases

Para 20-24 - Achieving a Mix of Housing

What does it say?

In the past it has been assumed that a mix of housing means mixed price and mixed tenure. These are still important issues for the PPS, but there is also a requirement for LPAs to set out a profile of housing sizes required, at site and neighbourhood levels (like 30% family units, 10% single person units etc), for both market and affordable housing. Developers and affordable housing suppliers are then asked to bring forward proposals to reflect these required profiles.

This section also reiterates the requirement to spatially mix different housing and tenure types.

What does this mean?

Many authorities see a prevalence of small units as a real problem, and despair of ensuring high quality family units. It may be that developers can make more money from more small units than less larger units. Also lots of small units create higher dwelling/hectare density scores, even though they may not be able to accommodate more people than less, larger units. With the London Plan requiring 'maximised' land use efficiency higher densities figures can be seen as a bonus, potentially pushing for more, smaller units.

Some authorities already have policies requiring a percentage of larger, or smaller, units, but this does not seem to be common practice. With the PPS's requirement for profiling, such policies could be seen as a necessity and should get support from Government Office and PINs. Such policies should help to ensure a better mix of units.

What should you do?

1. Construct policies, based on appropriate evidence, requiring housing type profiles. You may wish to do this for your whole Borough, but also for specific areas or sites. Specific profiles should sit within Area Action Plans.
2. Require different housing tenures to be spatially mixed, and not be visually distinct.

Paras 36 and 44 Providing housing in suitable locations

What does it say?

This section pushes for the reuse of previously developed land, including gardens! It also mentions possible reviews of Greenbelt designations in areas of high demand and need.

There is also a new requirement to consider the opportunities different locations provide to cutting carbon emissions due to lower car use and practicality of decentralised energy supplies.

There is also a call to review 'policy constraints' at the regional level. Could this mean the green belt?

What does it mean?

Arguably this section is one of the most challenging in the PPS, particularly for London and its large suburbs.

The concept of getting new homes in the right place, with the right relationship to surroundings, services etc, is very difficult when many new homes will be on small sites slotted into existing built up areas. It probably requires a real step change in the way Local Authorities 'plan' their areas. The PPS is calling for a co-ordinated and forward thinking approach to infill and backland development and the 're-design of existing areas(para 38). This might be relatively easy and logical around town centres, but the PPS could be used by developers to argue for increasing incremental change to established areas, particularly through the sub-division of large units and their gardens.

The focus on resource efficiency is not surprising. But, when combined with the potential for incremental change could be hard to follow. Some innovative planning might be needed here.

What should you do?

1. Depending on the likely location of new housing, you might need to ensure you have very well thought out and clear proactive policies for areas which will accommodate incremental growth, and its energy needs, not just policies for distinct growth zones.
2. You may wish to draw up Area Action Plans for suburban areas, not where there are any single, particularly large sites, but where you are aware of the pressure for incremental change. This would allow you to profile unit sizes, mixed uses and densities across the suburb, taking into account transport and town centre facilities.
3. You may find pressure to review 'constraining' designations.

What does it say?

These sections link, and expand, the section on identifying suitable locations, as covered above. But they also cover the thorny issue of housing density. The crude density matrix included in draft PPS3 has been removed. A basic working minimum of 30 dwellings per hectare is retained, although lower levels could be justified. But the big policy is the call for locally set density ranges. London is used to this with the London Plan matrix, but it is a new concept for many areas.

The section talks a lot about the efficient use of land, and explains about the balances needed to ensure appropriate densities, including the need to consider local character and mix of uses. Although the words 'maximise' or 'optimise' in terms of land use efficiency are not used, the PPS reads more as requiring optimised density than maximised density. Maybe this will be reflected in alterations to the London plan?

The PPS also requires local policies on car parking. Although very little is said here, more was in Para 16, parking policies can have very profound effect on density, and the quality of schemes.

What does it mean?

The PPS is not being as radical on density policies as perhaps it could have been. It acknowledges that there is no real correlation between good, or bad, schemes and density levels but calls for a relatively measured approach to the efficient use of land – not highest densities possible at all costs. This seems to be a tacit acknowledgment that maximising density is not always the most appropriate approach, particularly if you want to create high quality homes in good neighbourhoods.

The call for local density ranges could be a real opportunity for local authorities to marry local housing need and demand to the characteristics and spatial profile of their area. Imaginative use of this requirement could link to good masterplanning and Area Action Plans to create a responsible density agenda.

The PPS retains dwellings per hectare as the key measure, although acknowledging earlier in the PPS the need to profile for different home sizes, which will affect how schemes can meet a 'dwellings' based measure. The PPS is not explicit about how local ranges should be set out, and it may be that a combination of habitable rooms and dwellings would be most useful, and reflect local housing size profiles. It is interesting that the London Plan matrix, originally in dwellings and habitable rooms per hectare is now proposed to just refer to habitable rooms.

The PPS only briefly touches on car parking policies. But the amount, distribution and design of such spaces can have a very profound effect on density levels and the quality of schemes. So although para 53 of the PPS is sparse, it is requiring local policies that will take a lot of thought and have a

significant impact. English Partnerships guide to residential parking will be particularly useful here. The crux of successful parking policies is probably firstly that they reflect local circumstances, and don't try to change travel behaviour on their own. Secondly that they ensure good quality, pedestrian orientated residential public spaces.

All too often new housing schemes have tried to squeeze out the car to stop people using them, when there is no real alternative. So they end up filled with cars double parked, or on pavements etc. Similarly the design of open spaces all too often revolves almost entirely around the needs of cars so that residents have no where to sit, play, socialise, cycle etc. Local policies should try and prevent both of these occurrences.

What should you do?

1. Set down local density ranges, based on an assessment of the local character and circumstances of different parts of your area, and the need to use land and other resources effectively. Have a look at CABE/EP documents, but to be honest some new guidance on how to do this is probably needed.
2. Ensure you have car parking policies that are realistic about what they can achieve in terms of effecting transport consumption, and ensure high quality residential environments where the needs of the car do not overshadow all other space needs.

Para 76-77 - Local Monitoring and Review

What does it say?

This section lists the things Local Authorities must monitor. Alongside the need to monitor housing permissions and completions, percentage on brownfield land etc sits a requirement to monitor and report on design quality objectives where relevant.

What does this mean?

First, this means design quality is a serious objective, not an added on luxury. Next, it means we have to find good ways of monitoring quality. The issue is covered in the section above on 'Achieving High Quality Design', but it is worth looking at it in the context of other monitoring requirements in paras 77-78..

What should you do?

1. You will need to set up a consistent monitoring system as soon as you can. You should be able to say that you never give permission for anything but well designed schemes, that is what PP1 and PPS3 explicitly call for. But there will always be checks and balances in any planning decision.
2. The big challenge is getting a consistent quality assessment tool in place and using it properly at the application stage. If you do that, you should help create your monitoring returns.