



Open-City

Response to the draft *National Planning Policy Framework*

17 October 2011

OPEN-CITY is an independent organisation that champions the value of well-designed places and spaces in making a liveable and vibrant city, and the role everyone plays within it.

A high-quality built environment plays a key role in making cities liveable. Our advocacy and enabling work focuses on in-depth collaborative engagements that help councillors, communities and other stakeholders to consider what 'design quality' means, why it is vital in creating a more liveable city and how to demand it in their neighbourhoods.

Our wealth experience, expertise and research has been built up over two decades and we have a broad reach among many different communities – local authority officers and councillors, young people, creative professionals, and the wider public. This forms the basis of our response to this consultation.

NOTE:

The comments below also include those specifically related to the cultural importance of the public realm, under the banner of Open-City's Art in the Open (London's advisor for art in the public realm, funded by Arts Council England).

1. OVERVIEW

Open-City acknowledge that the draft NPPF document is a bold attempt to reduce thousands of pages of guidance to less than one hundred, and also that it appears to be largely successful in drawing out the broad requirements of the planning system.

However we are left with the sense that it says only just enough, but in saying only just enough, it lacks clarity and definition in some of its key statements. Such ambiguity is highly detrimental to the stated purpose of the document, and threatening to undermine both the individual and collective benefits of planning for a well designed and sustainable built environment.

Open-City's primary concern with the NPPF relate to the future of design, placemaking and architecture, and these are addressed fully below.

2. SUSTAINABLE DEVELOPMENT AND DESIGN

Open-City shares the view of many that the reliance on a presumption in favour of "sustainable development" needs a very robust definition of the term. At present, it is too open to interpretation, allowing different stakeholders to define what they mean by the term (e.g. communities will have a different view to developers and Councils).

Just as significantly, the draft document as a whole can, and will, be viewed as promoting economic growth at the expense of social and environmental sustainability; this not only undermines the stated commitment to sustainable development but also has serious implications for quality of design and placemaking.

If the NPPF is to allow a bias towards economic imperatives, it begs the question of whether sufficient local controls on design of the built environment and the public realm are in place to avoid growth of mediocre or poorly designed developments. For the avoidance of doubt, Open-City's view is that good quality design is an essential part of the sustainable development process, the two having a very strong affinity in that one clearly enables the other.

3. LOCAL AND NEIGHBOURHOOD PLANNING – IMPACTS ON DESIGN

- Large numbers of local authorities are still in the process of developing Local Plans – there is therefore a risk that unplanned, badly designed development can take place in these areas if there is a presumption to grant planning permission. This may also squeeze out good practice in building design, design of the public realm, including high quality art commissioning.
- The NPPF does not help in clarifying how neighbourhood plans will be more accountable than the current elected councillors. Whilst clearly acknowledging how important planning and development is he neatly side steps the fact that is also very complex and needs specialist knowledge and skills to be successful.
- The role of *Neighbourhood Forums* in defining a vision, planning policy and planning permission [49], clarifies their purposes, caveats their scope by requiring compliance with upper policy (Local Plan/NPPF/EU) [50] but then confuses matters by stating Neighbourhood Plan policy takes precedence where there is a conflict [51]. Again the overall emphasis is on growth, focused on quantity not quality.
- Local or wider vested interests may be able, through local development orders, to manipulate neighbourhood plans against the wishes of others in the community with less say and influence, potentially bringing adverse affects on the quality of the built environment and public realm [22].
- As an organisation engaged in bringing design thinking to communities and those not ordinarily concerned with making decisions about their built environments, Open City is concerned that local people may lack the skills, confidence or language to communicate with developers, architects, and other professionals so could be disadvantaged. This also applies to art in the public realm. Conversely, very derivative and poorly conceived projects in the public realm may result where there is little awareness of current good practice.

- Whilst clearly acknowledging how important planning and development is the NPPF neatly side steps the fact that is also very complex and needs specialist knowledge and skills to be successful. We believe that there is a role for organisations in upskilling those who want to engage in planning at community or neighbourhood level, and that this needs to be properly resourced to ensure that the delivery of sustainable development is balanced.

4. DESIGN AND HOUSING

The draft presents the appearance of a strong emphasis on the need for ‘high quality, well designed homes’ [107], although para 108 downgrades this ambition to ‘sufficient quality’. The NPPF also states that, “Our standards of design can be so much higher” – can rather than must. Whilst it is welcome that design is seen to be important, the NPPF provides no real benchmark for what it entails.

The NPPF rightly urges ‘truly outstanding or innovative design’ to be embraced and obviously poor design to be refused [121], but given the low number of outstanding designs and the high number of poor designs materializing just in the last ten years (the lifespan of CABA) the NPPF must address how deficiencies in the understanding of good design and the impact on quality of life can be overcome.

Open City welcomes the recognition of local design review arrangements [120], though this raises a number of points. Clearly, this is a huge undertaking; there are questions over quality and consistency of the advice given; the independence and impartiality of the people on the reviews; whether the reviews actually add value, rather than being just another hoop in the process; and whether design review should be the preserve only of professionals; design review should also allow community input, and Open-City have been exploring this area with some success.

Finally, the NPPF fails to make a meaningful link between good design and the role it plays in reducing the impacts of climate change and influencing transport decisions.

5. CULTURE, ART AND THE PUBLIC REALM

Finally, the cultural importance of the public realm is underplayed in the NPPF. There could be more emphasis on the extent to which integrating art commissioning programmes, alongside high-quality architecture and urban design, can help ensure creativity and excellence are embedded into the identity of a place, for the benefit of all communities.

Below are a series of suggestions for changes that would seek to address this. Our proposed additions to the draft NPPF text are highlighted in red:

PARAGRAPH 10, SECOND BULLET

- *“PLANNING FOR PEOPLE (A SOCIAL ROLE) – use the planning system to promote strong, vibrant and healthy communities, by providing an increased supply of housing to meet the needs of present and future generations; and by creating a good quality, well designed built environment, with accessible local services that reflect the community’s needs and supports its health and cultural well-being; and...”*

PARAGRAPH 19, FIFTH BULLET

- *“planning policies and decisions should seek to protect and enhance environmental, cultural and heritage assets in a manner appropriate to their significance, and reduce pollution. Where practical and consistent with other objectives, allocations of land for development should prefer land of lesser environmental value...”*

PARAGRAPH 19, NINTH BULLET

- *“planning policies and decisions should take account of and support local strategies to improve health, social cohesion and cultural wellbeing for all; and...”*

PARAGRAPH 23, FOURTH BULLET

- *“the provision of health, security, community infrastructure, good public spaces and other local facilities; and...”*

PARAGRAPH 23, ADD BULLET

- *enhancement of cultural infrastructure and encouragement of design excellence in the public realm, including high quality art commissioning.*

PARAGRAPH 76, ADD BULLET

- *recognise the importance of well designed public spaces and infrastructure, including elements such as street lighting, 'gateways', routes and squares, as essential to the development of thriving town centres*

PARAGRAPH 116, LAST BULLET

- *"are visually attractive as a result of good architecture, high quality public realm, relevant and considered commissioning of artworks, and appropriate landscaping."*

PARAGRAPH 119

"Although visual appearance and the architecture of individual buildings are important factors, securing high-quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places, encouraging high-quality design of the public realm, with a holistic approach to place making and the integration of new development into the natural, built and historic environment."

PARAGRAPH 124, SECOND AND THIRD BULLETS

- *"deliver the right community facilities, schools, hospitals, cultural infrastructure and services to meet local needs; and..."*
- *"ensure access to well-designed open spaces and recreational facilities that promote the health and well-being of the community."*

PARAGRAPH 128

"Access to good quality open spaces and opportunities for culture, sport and recreation can make an important contribution to the health and well-being of communities. The planning system has a role in helping to create an environment where activities are made easier and public health can be improved. Planning policies should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. The

information gained from this assessment of needs and opportunities should be used to set locally derived standards for the provision of open space, sports and recreational facilities. Planning policies should protect and enhance rights of way and access.”

END

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