Planning for the Future Consultation Response – October 2020

<https://www.gov.uk/government/consultations/planning-for-the-future>

*The lead author of this consultation response was Jacquel Runnalls, RCOTSS-Housing Co-opted Lead on Accessible and Inclusive Design, with additional contributions by RCOT members and Lauren Walker, RCOT Professional Adviser.*

*The response was submitted on behalf of RCOT by Lauren Walker on 16/10/2020.*

*Only those questions answered have been included below.*

**Pillar One – Planning for Development**

**Q6. Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally?**

Yes / No **/ Not Sure**

**Please provide supporting statement**

The new approach proposes a ‘sustainable development’ test and the paper refers to the need for aesthetic beauty and ‘net gains’ which is welcomed, but makes no mention of health and wellbeing nor specific standards and the wider benefits of inclusive, well-designed, accessible homes and inclusive neighbourhoods. How can a home be assessed as beautiful if none of these critical considerations are included?

The proposal to simplify and streamline Local Plans is welcomed in theory, however the wide-ranging proposals in the first section, including using latest technology and statutory timescales will require the appropriate resources, expertise, engagement with relevant bodies, and relevant published guidance clearly setting out the requirements to meet standards to ensure a successful, inclusive, localised outcome.

The proposals wish to set out a more focused role to assist local plans to identify local requirements, produce local design codes and ensure they meet the statutory ‘sustainable development’ test. To do this it is imperative that Government, when setting out national development management policies, still ensure that national policies enable local plans to meet these ambitions. This must include resources to ensure the appropriate skills and expertise are provided within the planning authority such as access and inclusive design professionals. Many of these roles no longer exist due to austerity which demonstrates the wider lack of recognition and understanding as to the importance these roles provide in ensuring sustainable neighbourhoods.

The current MHCLG’s National Design Guide references National Planning Policies and aims to promote good design in the planning system <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/843468/National_Design_Guide.pdf>. Whilst its overarching principles and intentions are good, it contains such a large amount of information, it would be difficult to measure ‘good design’ and development against it.

Without specific requirements or standards, it will be hard to ensure an easily understandable baseline to work from. Planning applications should be required to provide a robust and relevant Design and Access Statement (updated to provide appropriate guidance on equality, inclusive design etc) which demonstrates sustainable development i.e. as a minimum to be built to Part M ADM(4) Category 2 : Accessible and Adaptable, and which meets minimum space standards through the Nationally Described Space Standards. This is in addition to the need for a percentage to be built to ADM (4) Category 3: wheelchair housing and providing a range of other housing typologies, including acknowledging our ageing population e.g. sheltered, extra care, retirement housing. National policies would also need to ensure detailed consideration is given to acoustics, lighting, ventilation and access to outside space.

The proposed updating of the Manual for Streets is welcomed but there is no reference to the need for an inclusive and accessible built environment, so specific reference should be made to other relevant, up to date guidance such as 2018: BS8300 which references a wider range of impairments and associated design considerations e.g. wayfinding and people with neurodiverse impairments.

The proposals to reform and democratize the planning process by putting a new emphasis on engagement at plan-making stage from a wider range of people and groups through consultation is welcomed. However clarity, guidance, relevant expertise and resources will be required to do this, including ensuring compliance with their Equality Duties.

**Q7(a) Do you agree with our proposals to replace existing legal and policy tests for Local Plans with a consolidated test of “sustainable development”, which would include consideration of environmental impact?**

Yes / No / **Not Sure**

**Please provide supporting statement**

Any test for sustainable development would need to include much wider considerations referred to above and throughout this paper to ensure that it promotes health and wellbeing, inclusive placemaking, housing of a range of size/type and a range of housing typologies and tenures which are accessible and adaptable. As evidenced by Habinteg’s report on Local Plans <https://www.habinteg.org.uk/localplans/>) there is currently a severe lack of policies which require the creation of truly sustainable communities through the provision of accessible and adaptable housing.

**Q8.(a) Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced?**

Yes / No / **Not Sure**

**Please provide supporting statement**

The aim is to ultimately to increase housing delivery to meet local need, so whilst some standardisation may be beneficial, any methododology still needs to allow local factors to be taken into account. The paper refers to debates about housing numbers dominating this process and wishes to move away from local housing need to a standard requirement by distributing the national housebuilding target of 300,000 new homes annually. It does not refer to the quality or design of these homes which surely underpins the question of whether long term housing need is truly met.

The National Planning Policy Framework now sets out requirements to evidence local need to meet the needs of older and disabled people when preparing planning policy requirements <https://www.gov.uk/guidance/housing-for-older-and-disabled-people> but only provides a limited number of generic suggestions for collecting data. To obtain more robust local data it is recommended that LPA’s refer to guidance published in the EHRC Toolkit <https://www.equalityhumanrights.com/sites/default/files/housing-and-disabled-people-local-authorities-toolkit-england-planning-accessible-homes.pdf>

However, another way of standardizing and addressing local and national housing need is to design housing and neighbourhoods which are fit for purpose, meet longer term requirements and provide evidenced wide-ranging savings to housing, health and social care. An increasing amount of research, publications and organizational/parliamentary campaigns are supporting the provision of more sustainable planning policies through the provision of accessible and adaptable housing. These include the Inquiry into Housing for Older People <https://publications.parliament.uk/pa/cm201719/cmselect/cmcomloc/370/370.pdf>, the APPG for Healthy Homes and Buildings <https://healthyhomesbuildings.org.uk/>, the APPG into Decent and Accessible Housing for Older People <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/appg/appg-for-ageing-and-older-people---report-on-decent-and-accessible-homes-for-older-people.pdf>

The TCPA’s Healthy Homes Bill <https://www.tcpa.org.uk/healthy-homes-act>, and the HoME Coalition <https://www.habinteg.org.uk/homecoalition>

Therefore a sensible approach to ensuring local need is met in a standardised way would be to require, as a minimum, that all housing is built to ADM (4) Category 2 : Accessible and Adaptable and the Nationally Described Space Standards, with at least 10% to ADM (4) Category 3 : Wheelchair Housing. These have been required in London since 2004 so demonstrate that it is achievable even within higher density development.

However, even standard methods for establishing housing requirements would need to take into account demographics and fully acknowledge our ageing population so as to ensure a range of housing typologies and tenures are built, including sheltered, extra care and retirement type housing.

**Q11. Do you agree with our proposals for digitised, web-based Local Plans?**

**Yes** / No / Not Sure

Please provide supporting statement

The proposal for Local Plans to be visual and map-based, digitalized, standardized and shorter in length may also be beneficial in engaging local communities more easily, enabling them to feed in their views through social networks and via their phone is welcomed. Whilst it refers to the need to ensure inclusivity and access in different formats and that they should be accessible and understandable by all. This supports the need to ensure those who are harder to reach and/or are unable to use these platforms are included, and should be considered in light of recently introduced legislation to ensure public sector bodies duties <https://www.legislation.gov.uk/uksi/2018/852/contents/made>,

All of the proposals will require significant resources and a change in practice so will require appropriate additional support. This focus on everything being online and digitalized is also not appropriate or sufficient to ensure engagement and that local plans truly reflect their local community. Additional resources will be required, such as personnel with relevant expertise and understanding, providing training to residents, co-workshops, the setting up and ongoing support of a local access group to ensure developments are inclusive etc.

**Q13 (b) How can the neighbourhood planning process be developed to meet our objectives, such as in the use of digital tools and reflecting community preferences about design?**

Refer to response to Q.11 above. Again, digitalization cannot be used in isolation and/or without relevant additional, alternative methods of support to scrutinize designs etc.

**Pillar Two – Planning for beautiful and sustainable places**

**Q16. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area?**

* **Less reliance on cars**
* **More green / open spaces**
* **Energy efficiency of new buildings**
* **More trees**
* **Other (please specify):**

The above priorities miss critical priorities to create true sustainability such as providing accessible, adaptable, inclusive homes and neighbourhoods which promote health and wellbeing. They are again quite vague and omit references to what standards or measurable outcomes should be expected, how to apply them, and that they should support diversity, adaptability, space, acoustics, ventilation, light, green space etc.

Neither the Building Beautiful Commission’s report nor this White Paper makes any mention of these points, despite the large amount of current campaigns (see above) and lessons learnt from the current Covid crisis to enable health and wellbeing. There is no mention to the importance of providing an inclusive built environment or British standards such as the updated 2018 BS8300: Accessible and Inclusive Built Environment. Inclusive Design is now core project strategy within the RIBA Plan of Work <https://www.architecture.com/knowledge-and-resources/resources-landing-page/riba-plan-of-work> and part of the Construction Industry Council’s essentials principles guide and certification scheme <http://cic.org.uk/services/inclusive-environments-recognition-certification-scheme.php>.

This is also in addition to an increasing number of APPG’s recognizing the housing needs of our wider population, including disabled and older people, such as the APPG for Healthy Homes and Buildings, the TCPA’s Healthy Homes Bill and the HoME coalition calling for urgent action <https://www.habinteg.org.uk/download.cfm?doc=docm93jijm4n2310.pdf&ver=2754> These are all underpinned by wide ranging research on the lack of accessible and adaptable housing such as from Habinteg <https://www.habinteg.org.uk/policy-and-research> in addition to the costs of poor housing that does not meet accessible and adaptable standards, such as the 2016 BRE report showing the cost to the NHS as £1.4bn per year and wider society at £18.6bn <https://www.bre.co.uk/news/New-BRE-Trust-report-shows-poor-quality-homes-in-England-cost-the-NHS-14bn-per-year-and-wider-society-186bn-1161.html>

**Q17. Do you agree with our proposals for improving the production and use of design guides and codes?**

**Yes** / No / Not Sure

Please provide supporting statement

The paper states that the National Design Guide illustrates how well-designed places that are beautiful, enduring and successful can be achieved with ten characteristics. However, it is too vague and does not address many of the concerns highlighted in this response that are required to create truly sustainable buildings and neighbourhoods. Therefore the proposed National Model Design would need to be more specific, and whilst the updating of Manual for Streets is welcomed, this does not address the overarching principles of promoting health and wellbeing. Any design guides or codes must be underpinned by the principles of Inclusive Design so as to design for the whole community and include emerging design principles such as Design for the Mind and build on aspects highlighted in the 2018 BS8300. Good practice examples such as the London Plan should also be referenced <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/intend-publish-london-plan-2019>.

As with the London Plan, they should also be underpinned by specific measurable standards to promote health and wellbeing e.g. for accessible and adaptable housing and space, but also include standards around light, acoustics, ventilation, access to green space etc. The Mayor of London also sets out a united programme of work to enhance the design of buildings and neighbourhoods for all Londoners in a way that creates successful, sustainable and inclusive places <https://www.london.gov.uk/what-we-do/regeneration/advice-and-guidance/about-good-growth-design>. This includes setting standards, applying standards, building capacity, supporting diversity, commissioning quality and championing good growth.

To produce this guidance, a detailed consultation exercise with a range of relevant bodies and expertise will be essential. This should also include engagement with built environment professionals working on the ground and with the community, including those who get involved throughout the planning process through to post occupancy evaluation e.g. access advisors, specialist housing occupational therapists.

Design Codes would also need to be regularly reviewed to ensure they are up to date, with funding provided to undertake research to ensure they are fit for purpose and consider changes to legislation/guidance, emerging aspects impacting on people and new buildings e.g. Covid, working from home, the need for space, light, outdoor space etc.

**Q18. Do you agree that we should establish a new body to support design coding and building better places, and that each authority should have a chief officer for design and place-making?**

Yes / No / Not Sure

Please provide supporting statement

The remit of a new body to support the design codes would need further consultation and clarification, particularly in terms of the local authorities ‘making use of design guidance and codes’, in addition to ‘performing a wider monitoring and challenge role’. However it will be important to ensure equity, so a single body may assist with this.

It should be independent from Government so as to scrutinize what is being proposed, and contain expertise from relevant stakeholders including those with expertise in designing inclusive homes and neighbourhoods (not simply architecture and design centres as cited). The latter should also include specialist housing occupational therapists who oversee the design of new build housing and neighbourhoods (throughout all stages of the planning process to completion), in addition to bringing a person-centred approach through working with the people who live in the new homes and providing insightful post occupancy feedback.

The new body should also include engagement with the wider diverse community/voluntary organisations, including ensuring they are meeting their requirements under the Equality Act.

The proposal for local authorities to have a chief officer for design and place-making could assist by providing a clearly identifiable person in a dedicated post who can scrutinize good design and liaise across a wider range of departments and key stakeholders. However the remit of this role would require clarity so as not to create duplication, nor would it negate the need for staff to have the appropriate training and the ability to assess good design. This role must include the promotion of inclusive design to create homes and placed for health and wellbeing and could include ensuring continual professional development across the authority and set standards for those work on development (see CIC above). A good practice example is that of the Mayor of London’s Design Advocates <https://www.london.gov.uk/what-we-do/regeneration/advice-and-guidance/about-good-growth-design/mayors-design-advocates> whose goals include; promoting the aims of the Good Growth by Design Programme, setting ambitious design standards, investigating the challenges facing London’s built environment, conducting rigorous design review, advocating for the quality of the built environment.

**Q19. Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England?**

Yes / No / Not Sure

Please provide supporting statement

The proposal to consider how its objectives might be strengthened to give greater width to design quality and assess how design quality and environmental standard can be more deeply embedded in all Homes England’s activities and programmes is welcomed, as is attaching value to design as well as price, and giving greater weight to design quality in its work.

However, the objectives are vague and require to be more robust in terms of inclusive design and promoting health and wellbeing (as discussed above), in addition to having standards that are measurable.

N.B. The predecessor to the Homes Agency, the HCA/Housing Corporation previously produced Design Quality Standards and Housing Quality Indicators, which included references to specific standards relating to accessibility and adaptability and space.

**Q.26 Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?**

As we have detailed throughout our response to this consultation, it is concerning that health and wellbeing has not been considered more robustly throughout the proposals. Increasing the availability of inclusive and accessible homes and neighbourhoods is essential in order to address social and health inequalities, and to uphold the rights of people with protected characteristics – specifically age and disability.

It is necessary for local planning authorities to have access to tools and expertise in order to identify and meet local need for accessible and inclusive places, utilising best practice guidance such as the EHRC toolkit (<https://www.equalityhumanrights.com/sites/default/files/housing-and-disabled-people-local-authorities-toolkit-england-planning-accessible-homes.pdf>).

The concept of sustainability must be widened to consider accessibility and inclusivity. LPAs should employ specialists such as housing occupational therapists and access consultants to design homes and neighbourhoods that are fit for purpose for people of all ages and abilities, both now and in the future.

There should be mandatory baselines to ensure that an effective level of accessibility is achieved in all newly built environments. To this end, all new homes should be designed to achieve the standards of M4 category 2 of the building regulations. Accessibility within the wider built environment should be based on 2018: BS8300.

The commitment to increasing engagement at the plan-making stage is welcomed, but this must be conducted meaningfully – both seeking to remove barriers to participation, and proactively encouraging involvement from groups and individuals who are commonly marginalised.