

PPG3 and Urban intensification

Lecture by Philip Barnes - Director of Development, Nathaniel Lichfield, given at the Design for Homes Intensive Flair conference 14th June 2001. 30 mins CPD

I want to look at the high density urban housing issue in planning policy terms and focus on PPG3, now more than a year old, and how it is actually playing out on the ground. I will be doing that under three headings. First, the contents of PPG3 and the new high density agenda, what PPG3 actually says, looking at the differences between and within regions. Second, the main thesis of my paper is that it is as much about design as about density. If you get the design right then density will be less of an issue. And third, a quick canter through some appeal decisions, why appeals have been successful and why they have not, arriving at some findings and then some conclusions.

But first the context which I shall be looking at under three other headings. What government sees as the context, the market context (which Yolande has already touched on) and the local authority context. So what is the government's take on the high density agenda? Emphasising a good design is fundamental; that is made clear both in PPG3 and in PPG1. Housing needs must be met, and housing needs are very significant. In London and the South East that's about 66 000 new units a year. The government wants to encourage high density and the reason is to enable those housing needs to be met without unnecessary greenfield development.

In the market, we heard from Yolande, there is very strong demand overall at the moment, much strengthening demand for city centre and urban living. The population of central Manchester has risen from 1000 people to 10 000 in the space of 10 years; and the demographic trends would tell us a much strengthening market for higher density living. Eighty percent of the new households which form the 66 000 dwellings required per year in the South East are single person households.

What's the local authority context? I think that is much more mixed. Authorities with high density urban city centre areas are generally receptive to the high density agenda, the change that has been introduced by policy PPG3. Authorities dominated by suburban housing or rural authorities have, in my opinion, adopted a more cautious and less receptive approach on occasions. We have to recognise how much the new PPG3 is a dramatic change in policy. Local authorities are playing a game of catch up with their Unitary Development Plans and their housing layout standards. Even the ones who want to deliver the high density agenda are struggling to square that agenda with their existing plans and standards. With

some local authorities, it doesn't matter what PPG3 says or what the officer says, the members don't want to embrace a high density agenda. That is the political reality in some authorities.

I want to look at what PPG3 says, first on design. Let's remind ourselves of the new policy agenda introduced. What did the old PPG3 say and what was the national policy on design in February 2000? It said that it would be "rarely justifiable for local planning authorities to impose controls of the detailed design" and that "the functional requirements of housing layouts are for the most part a matter for the marketing judgment of developers in the light of customers' requirements".

What is national policy since March 2000? "That design and layout must be informed by the wider context" and that wider context is "townscape/landscape", broadly, and in detailed terms streets, spaces, building tradition materials and ecology. "Applicants should demonstrate how they have taken account of the need for good layout and design". "Planning authorities should reject poor design".

So that is the scale of change. PPG3 refers to a number of documents, blueprints for how to do good design. There are five here that I have put up. Places, Streets and Movements (1998), Sustainable Settlements (1999) By Design (2000), Urban Design Compendium (2000) and The Value of Urban Design (CABE) (2001). They are all documents on design or DTLR endorsed documents on design, all with a checklist telling us how to do urban design and embrace the new PPG3 agenda. Whether there are more skilled urban designers coming through I'm less certain about.

What does PPG3 have to say on density, the theme of the conference? It says developing within urban areas does not mean building on urban green spaces, but local planning authorities should examine standards for road layouts and car parking, not throw them out, but examine them. Limited or no off-street parking may be acceptable near public transport. Thirty to 50 dwellings per hectare is the preferred range of density, but higher densities than that are to be encouraged in locations near good public transport.

So it is not a high density free-for-all, it is an encouragement for densities to increase within the context. But any design solution must be informed by its wider context. We need to remember that.

Here are some other guidance notes that are probably helpful. This time it is the ex-planning minister Nick Raynsford speaking to the Local Government Association Conference: "Suburban standards can stand in the way of securing well-designed sustainable environments." "Local planning authorities should "facilitate" - not encourage "facilitate mixed use," and that's PPG1 and PPG3. "In London high-rise development may be acceptable in key transport areas." So even there it is clear the encouragement for high densities but it is not a high density free-for-all.

I want to talk about the difference between regions (1). Let me draw some comparisons between the North East as a region and London and South East. Population density in London is 4500 people per square kilometre; North East, 302. Housing requirements; London and the South East together,

| Inter-regional variations | | | |
|---------------------------|---------|-------------------------|------------|
| | London | South East excl. London | North East |
| Population Density | 4513 | 412 | 302 |
| Housing requirements | 23000pa | 43000pa | 5000pa |
| Detached housing | 5% | 29% | 11% |

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about 66 000 units per year; the North East it is 5000 units per year. We turn to the housing stock; in the South East, excluding London, around one-third of the housing stock is detached, compared with 10-11% in the North East.

The high density agenda is most important for London and the South East where there is a need to balance the housing stock, where there is a need to meet these very high housing requirements without unnecessary greenfield development, where there is a much greater need for housing; and, crucially, where the market is most receptive to the high-density kind of product.

In true New Labour fashion, I think it is the differences within regions that are as important, probably more important. It doesn't matter what region you're in, they're very different planning issues between cities and towns; between centres,

between suburbs; between mixed use areas and between residential areas.

It's in cities, centres and mixed use developments where authorities, in my experience, tend to be more dynamic and receptive. It is in towns, suburbs and residential areas where authorities have a tendency to be more cautious, more resistant. Between the two will be the battleground between the Secretary of State's desire for higher density and some local authorities' resistance to implementing that agenda.

As I said, a thesis of this paper is that it is as much, if not more, about design than density. In my experience, concern over how buildings and housing layouts look and how they operate, that's a function of design not a function of density. There was an article in The Guardian last week on the issue of high density urban housing, talking about "schlock PoMo apartment blocks", describing one as "conspicuously ugly, suitable for downtown Bucharest", and talking about the standard high density housing style being "cloned from computer-generated DNA". "The fast track developer style has no place on metropolitan streets," it read. We need to be aware that if we get the design wrong there will be a backlash and it will come quicker than the backlash came to the high rise developments in the early 1970s.



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Now I want to canter quickly through some appeal decisions which pick up the themes of what I have been saying. Some unsuccessful examples first. Chelmsford (2), May 2000, 20 units, allocated in the plan outline permission, the density's fine but the design is, according to the inspector, "unacceptably utilitarian". It's "poor quality over-development and creates unacceptable living conditions". Density was right but design wasn't and so it failed.



3

Ealing (3). 45 flats and houses on a TA building and the inspector said it is a high density scheme but that's not a determining factor. No harm to surrounding conditions. He notes that it is a large, bulky and high building. He particularly looks at boundary treatments and notes that they're just not in accordance with the boundary treatments of the Victorian neighbours. On one frontage there is no boundary treatment at all.

On another it is too high and doesn't reflect the frontages of the neighbours. So you have to demonstrate that the design is informed by the surrounding character. You can demonstrate that.

Harrow. Two houses, ten flats, design's okay, density's okay, amenities okay, but the loss of trees is unacceptable. The street scene and the local character of an area is not just about building. It is about landscape as well.

Evesham. 59 dwellings, September 2000. Fifty-nine dwellings on a contaminated former factory, an important riverside position, a design which the inspector says is totally alien to the historic form of the settlement and has not been designed with imagination. It can be brown field, contaminated high density but that won't overcome the requirement of PPG3 for good design.

Those were the unsuccessful case studies, although some will say they are successful cases if it means

the outcome is controlling poor design. Let's look at where developers have been successful.



4

Ascot, February 2001, 12 homes on a vacant pub. The design's okay and the street scene; crucially the loss of the pub has been demonstrated not to affect village viability. The density is fine by PPG3. The parking is less than the local authority wants but it is more than PPG3 wants and it gets through. The design is okay and they have considered the loss of the existing use and the inspector is happy to go with it.

Ascot again (4), this time 79 flats, 57 per hectare, a four-to-five storey development. It is four times the density of the nearest housing, predominantly two

and three storey. Crucially the site is visually separated from the nearest housing and is visually linked to a large commercial development and a hospital. And in an area of clear housing need, the inspector went with it. It is clear that the local character of an area, notwithstanding what local authorities may say to you, is not just about the density of the nearest houses; it is about what that site visually and functionally relates to.

Lambeth. This is my favorite. If the architect is here today I will happily buy you a drink. In planning terms it is good practice. Here you have 75 units in a conservation area; 26 of those are new build. We are heading for a refusal, aren't we? But it is a careful design. It is the redevelopment of a school. It involves an unattractive 1970s block, involving the sensitive enhancement and conversion of a 1960s block. It involves essential new houses which historical research has shown previously accommodated houses. The old headmaster's house and the old caretaker's house. Terraced houses on an area which previously accommodated a Georgian terrace. It's the school they have removed for operational purposes. It was a conflict with standards. But 75 units, conservation area, conflict with standards, the design team have undertaken careful research and produced a proper design justification and it overcame those policy constraints.

Redditch. May 2001, 23 units at 30 dwellings per hectare, the bottom end of PPG3 standards. The inspector said no need to match exactly the existing housing densities just because that is lower than 30 dwellings per hectare. Quoted Nick Raynsford's statement about suburban standards standing in the way. There was a minor conflict with parking standards but he looked at the design and said, "This is intrinsically attractive and demonstrates imaginative thinking." Again good quality design can overcome objections.



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Elmbridge. I have thrown this in because it is probably a scenario that many of us are familiar with. Housing, brown field, builders' yard, housing need. Councillor said, you build terraced houses, we don't want garages, we want bigger gardens. The density at the very bottom end of PPG3 is too high. No justification to sustain that refusal and appeal successful. If the local planning authority cannot

justify objections and refusal then they go to appeal.

Final one, Islington; again conservation area; Victorian Church to be demolished and replaced by new church with a mixture scheme, a new church and housing. The inspector says the existing church is rather utilitarian and uninteresting. He says the new scheme is good, modern design. Again the message is mixed uses, good design, can overcome what on the face of it is a significant policy obstacle. Let's try to draw all these together. Inspectors say you cannot really draw conclusions from previous appeal decisions. Each case is different and the inspectors are as individual as the cases. No matter, I'm going to draw some conclusions.

It seems to me, looking at these appeal decisions -- I could have cantered through perhaps another 15 or 20 others -- that these are the messages that are coming through the post PPG3 appeal decisions. You must demonstrate how local character has informed design and avoid the use of standard products if possible. You must justify fully in design terms any breach of standards. You must focus on the decision maker from day one, and that means focusing on the Secretary of State and the local authority from day one. The mixed use can overcome policy objections, particularly on employment sites. If you are going with a scheme which does conflict with policy and standards, just check that those standards are pre-PPG3 standards rather than post-PPG3 standards.

These appeal point to an obvious conclusion: the most sensitive sites of high density schemes are suburban with low density surrounding housing, are remote from services and public transport; they are subject to local policy constraints and that is particularly effective if it is a post-PPG3 plan, and that the existing use of the site might in itself be low density housing. Clearly the least sensitive sites for high density schemes, city and town centres where there is policy support for that kind of proposal, or at least no policy constraint, where there are non-conforming bad surrounding uses, where the site is visually separate from lower density housing, if there is nearby low density housing, where the site is visually linked to high density uses and high density housing areas and there is an opportunity to use mixed uses as a means to overcome a policy conflict, particularly related to private sites.

So my final slide, the first conclusion I'd make is that housing need is crucial. You must be able to demonstrate housing need. If there is no housing need for your scheme, it doesn't matter how high density or how good your design is, how brownfield the site is, you won't get consent.

Again, we are back to regional variations there. I have given you an indication of the requirement in

the South East; less likely to be an issue in those areas but can well be an issue in the Midlands and further north. Employment sites, in my view, and I suspect shared by many of you, is likely to be a real source of high density urban housing schemes.

"Sites are existing in employment use or vacated employment sites or sites which are allocated for employment purposes." PPG3 says that. PPG 17, which is more recent guidance, also says that. "Tapping the Potential", that's the government's good practice guide on assessing urban housing capacity also says that. There is a weight of policy in your favour if you are promoting high density housing schemes on employment sites, presuming you can demonstrate it is not required for employment.

Bespoke designs. I wonder whether we are about to move away from the use of standard house products and house designs, a move towards bespoke designs for each individual site demonstrate the design's been informed by its context. Implications there for volume housebuilders in terms of use of their standard products. We need to engage architects and urban designers in delivering a new product to the new market. New product, new market; maybe there's a need for rebranding and rebadging of their product, maybe developing specific products for high density urban housing and rebadging and rebranding it for that different market.

My final point: it is increasingly about justification. If you, as a developer, an architect, can justify the design and density of your scheme and the local authority cannot justify its objection or its reason for refusal, then go to appeal. In those circumstances, as I hope I have to have demonstrated, you should have a fighting chance of coming through.