

## **HIGHBURY GROUP ON HOUSING DELIVERY**

### **RESPONSE TO CONSULTATION ON NPPF AND NATIONAL MODEL DESIGN CODE**

#### **Introduction**

The Highbury Group comprises an independent group of specialists from the public, private and independent sectors with a membership drawn from housing, planning and related professions; it offers advice and makes representations to Government and other agencies on a variety of subjects, with the aim of maintaining and increasing the output of housing, including high quality affordable housing.

#### **Comment**

The Highbury Group at its meeting on 15<sup>th</sup> March discussed the Design Code and related proposed amendments to the NPPF following a presentation from Andy von Bradsky and David Rudlin.

We welcome the publication of the National Model Design Code. We note that the code is intended to supplement planning policy as set out in adopted Local Plans rather than to replace it. Any local design codes whether at local authority level or for a smaller area within a local authority should not set guidance which restricts the ability to deliver the requirements set out in the local plan. We have specific concerns that design guidance may militate against the provision of housing which contributes to meeting the full range of housing needs and is affordable by prospective occupants. We also have concerns as to the capacity within many local authorities to prepare local plans within the required timescale, to prepare local design codes and to carry out the various stages of scheme assessment in accordance with the national model design code.

We do not support the insertion of the term 'beauty' into the NPPF, specifically in chapters 2 and 12. We support the focus in the Model Design Code in establishing specific criteria for quality, which can be assessed in the context of a specific development proposal. The term 'beauty' is however subjective not objective and the use of the term in the NPPF is likely to generate a focus on aesthetics and competing perceptions of beauty in both public consultation and decision-making in relation to specific development proposals which will distract attention from the required assessment of compliance with planning policy and measurable standards and quality factors.

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