



National Planning Policy Framework and National Model Design Code
MHCLG
3rd Floor, FRY Building
2 Marsham Street
London
SW1P 4DF

Email:

PlanningPolicyConsultation@communities.gov.uk

Dear Sir/Madam,

RE: National Planning Policy Framework and National Model Design Code

As Abri, one of the largest housing providers in the south of England, with 30,000 homes, we have a strong development pipeline and ambition to build at least 1,000 homes a year for the next decade. As such, we welcome the opportunity to respond to this consultation.

If you'd like more detail on any of the points we raise, please do get in touch using the contact details provided below.

Consultation questions and responses

Changes to the National Planning Policy Framework (NPPF) -

As a whole, we welcome the proposed amendments to the NPPF and have no detailed comments to make on this aspect of the consultation.

Q.15 Response to National Model Design Code (NMDC) -

a) The content of the guidance

We welcome the draft NMDC. It provides a good summary of design principles and therefore it should provide a useful tool for local planning authorities when considering design parameters and issues within their local context (as set out in Section 5, page 1 of the NMDC).

We are pleased to see that the NMDC has been developed through work across government departments including the Department for Transport. It is important that the good work that is happening across various departments is brought together to enable different initiatives for the built environment to support one another.

While we welcome the guide and recognise the importance that it is a 'living' document that evolves over time, we believe that the NMDC should stick to outlining the good placemaking principles seen in this draft edition and should avoid becoming overly concerned with style.

The question of style should be answered through consultation between developers, local communities and local authorities, and we believe a focus on this within the NMDC would dilute its usefulness as a guidance document for good principles that form the foundations of good design.

b) The application and use of the guidance

In response to the detail included within sections 9, 10 and 11 (page 2 of the NMDC), we feel that while standardisation of approach is good for development principles, we believe it's also a useful tool to have a more standardised set of environmental and sustainable performance principles. This would contribute to the net zero carbon journey and help to level up the playing field across the regions and the country as a whole. It would ensure greater take up of sustainability measures thus improving transferrable knowledge basis, skills and expertise while delivering improved supply chain opportunities and national environmental performance.

We do wish to note the likely resourcing burden that this work is going to place on local authorities. If the NMDC is going to be used to its full potential across all local authorities, it will be important to consider the implications of preparing guidance and ongoing consultation on the capacity of local authorities and what can be done to ensure that adequate capacity is put in place.

c) The approach to community engagement

In line with our overall view on the NMDC and NPPF changes, we are supportive of the overarching aims of the Guidance note for Design Codes. We think that it provides a comprehensive summary of good practice in community engagement.

Based upon our experience of facilitating community events, we believe that the success of such an ambitious level of community engagement will be about how community meetings and events are managed (Section 215 of the Guidance note for Design Codes, page 90).

Workshops that we have facilitated have sought to provide consultees with the tools that they need to contribute to shaping their neighbourhood. This is often through a 'hands on' event that focusses on design priorities. The NMDC should help with this by promoting greater visualisation of design principles to help local authorities consult with communities.

We'd like to extend our thanks for the opportunity to respond to this consultation and ask that you please let us know about any future consultations via our Head of Press and External Affairs, Carlene Leonard, at carlene.leonard@abri.co.uk.

Yours sincerely,
Jonathan Rickard
Head of Sustainability and Design
Jonathan.rickard@abri.co.uk