

# NPPF and National Model Design Code

## Response from the Landscape Institute

**For:** MHCLG

**Date:** 27 March 2021

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## 1 Background for members

On 30th January MHCLG published the **National Model Design Code**. This seeks to improve the standard of design through the planning system.

Proposed **changes to National Planning Policy Framework (NPPF)** were also published at the same time. Both documents were available for public comment until 27th March 2021, and they are anticipated to become part of national planning policy later in the year.

The two updates are intended to implement policy changes in relation to the 2020 Building Better Building Beautiful Commission report, *Living with Beauty*, which the Government published its formal response to in January 2021.

The National Model Design Code sets out requirements for the design policies proposed in the NPPF, and taken together, these will significantly change the way places and landscapes are designed and built through the planning system.

The consultation consists of two related things:

- i. Various textual changes to national policy made through to the NPPF, which (broadly speaking) aims to enforce better design through the planning system; and

- ii. The draft National Model Design Code, with separate guidance notes. This provides detailed guidance on the production of design codes, guides and policies produced by Local Planning Authorities working with their communities and the industry to promote “successful design”. This follows the National Design Guide, published last year, which forms part of Planning Practice Guidance, and is therefore a material consideration in decision-making.

MHCLG also confirmed that the wider planning reforms set out in 2020 in the Planning White Paper are still expected, and a Government response to the consultation can be expected “in due course”.

## 2 Summary

We have commented on the specific proposals on both the NPPF (Section 3) and the Model Design Code (Section 4) below. In summary:

- We strongly support the Government’s stated ambition to increase the standard of design through the planning system.
- The policy changes to the NPPF are – for the most part – extremely welcome. Many of the changes directly address our concerns raised during the 2018 NPPF review, and we are pleased to see them here.
- In particular, we support the new tree-lined streets policy. The importance of siting new trees and designing for the retention of existing trees cannot be overstated, and working with landscape architects is vital to achieve this.
- We do not support the proposed reforms to Article 4. We believe these to be out-of-line with the wider changes, and reforms made elsewhere to Permitted Development Rights.
- The use of design codes can be an effective way to achieve an increased standard of design, and the National Model Design Code is a useful tool in that regard. Many of its principles and guidance notes are exactly right.
- Nevertheless, we believe it can be improved. In particular: to take better account of landscape character, to more comprehensively integrate green infrastructure and SuDS at all levels, and to further promote design for sustainability in the context of climate change.
- None of these reforms will be successful without adequate resources and suitably qualified professionals to undertake them. There is currently a major skills shortage in landscape planning and design (and related professions) in the UK, which impending immigration reforms will only exacerbate. There is an even more acute lack of these skills within many Local Planning Authorities. Serious consideration needs to be given to this issue in the near-term.

## 3 NPPF - Draft text for consultation

This includes changes to planning policy on design, tree-lined streets, removal of statues, isolated homes, and use of article 4 directions to restrict permitted development are among proposed alterations to the NPPF published by the government.

### 3.1 Chapter 2: Achieving sustainable development

The revised text reflects the government's response to the Building Better Building Beautiful Commission, and makes a small number of other minor changes:

- The wording in paragraph 7 has been amended to incorporate the 17 Global Goals for Sustainable Development which are a widely-recognised statement of sustainable development objectives, to which the UK has subscribed.
- Paragraph 8(b) has been amended in response to the Building Better Building Beautiful Commission recommendations to emphasise the importance of well-designed, beautiful and safe places in achieving social objectives of sustainable development.
- The wording in paragraph 8(c) has been strengthened to emphasise the role of planning in protecting and enhancing our natural, built and historic environment.
- The wording of the presumption in favour of sustainable development (paragraph 11(a)) has been amended to broaden the high-level objective for plans to make express reference to the importance of both infrastructure and climate change.
- The final sentence in footnote 8 (referred to in paragraph 11(d)) has been removed as the transitional arrangements for the Housing Delivery Test no longer apply.

#### Q1. Do you agree with the changes proposed in Chapter 2?

**Yes. We strongly support these changes.**

**The word 'inclusive' should be added to the description of well-designed places in paragraph 8(b), to ensure they are well-designed for all users.**

### 3.2 Chapter 3: Plan-making

The revised text reflects the government's response to the Building Better Building Beautiful Commission, and recent legal cases:

In response to the Building Better Building Beautiful Commission recommendations, paragraph 20 has been amended to require strategic policies to set out an overall strategy for the pattern, scale and design quality of places.

Paragraph 22 has also been amended in response to the Building Better Building Beautiful Commission recommendations to clarify that councils who wish to plan for new settlements and major urban extensions will need to look over a longer time frame, of at least 30 years, to take into account the likely timescale for delivery.

Paragraph 35(d) has been amended to highlight that local plans and spatial development strategies are 'sound' if they are consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the Framework, and other statements of national planning policy where relevant. This ensures that the most up to

date national policies (for example, Written Ministerial Statements) can be taken into account.

## Q2. Do you agree with the changes proposed in Chapter 3?

**Yes. We support these changes.**

### 3.3 Chapter 4: Decision making

The revised text aims to clarify the policy intention for Article 4 directions:

In order to ensure Article 4 directions can only be used to remove national permitted development rights allowing changes of use to residential where they are targeted and fully justified, we propose amending Paragraph 53, and ask for views on two different options.

We also propose clarifying our policy that Article 4 directions should be restricted to the smallest geographical area possible. Together these amendments would encourage the appropriate and proportionate use of Article 4 directions.

## Q3. Do you agree with the changes proposed in Chapter 4? Which option relating to change of use to residential do you prefer and why?

**No. We do not support these changes.**

**In the context of the recent expansion of Permitted Development Rights,<sup>1</sup> we do not support further limitations placed on Local Planning Authorities' ability to bring forward Article 4 directions, in order to create specific exemptions where local circumstances justify it.**

**The existing policy wording, alongside the wider framework of targets and incentives for housebuilding, is more than sufficient to mitigate against any possible misuse.**

**Of the two options given, the former ("unacceptable adverse effects") is preferable. The latter ("interest of national significance") is less clear and inappropriate in the context of the locally specific challenges and opportunities which necessitate Article 4 directions in the first place.**

### 3.4 Chapter 5: Delivering a wide choice of high quality homes

The revised text aims to clarify the existing policy and reflects the government's response to the Building Better Building Beautiful Commission and recent legal cases:

Paragraph 65 has been amended to clarify that, where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership. This is to

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<sup>1</sup> <https://www.gov.uk/government/news/new-laws-to-extend-homes-upwards-and-revitalise-town-centres>

address confusion as to whether the 10% requirement applies to all units or the affordable housing contribution.

Paragraph 70 has been amended to remove any suggestion that neighbourhood plans can only allocate small or medium sites. This was not the policy intention, so the wording has therefore been amended to clarify that neighbourhood planning groups should also give particular consideration to the opportunities for allocating small and medium-sized sites (of a size consistent with new paragraph 69a) suitable for housing in their area.

Paragraph 73 has been amended to reflect Chapter 9: “Promoting sustainable transport” in ensuring that larger scale developments are supported by the necessary infrastructure and facilities including a genuine choice of transport modes.

Paragraph 73(c) has also been amended in response to the Building Better Building Beautiful Commission’s recommendations to clarify that when planning for larger scale development, strategic policy making authorities should set clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles) and ensure that masterplans and codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community.

#### **Q4. Do you agree with the changes proposed in Chapter 5?**

**Yes. We support these changes.**

**The proposed changes to Paragraph 73 are welcome; however this policy would be improved by clarifying that sustainable transport modes should be enabled as the first option.**

**The changes to Paragraph 73c are welcome, and masterplanning in particular is a powerful tool to achieve these outcomes. This paragraph could be improved by clarification of the importance of *landscape-led* planning for large-scale developments, in line with the Building Better Commission recommendation to begin with development that is “Beautifully placed (sustainable settlement patterns sitting in the landscape)”. This is not captured in the Garden City principles, which are high-level principles not – for the most part – about design.**

**We suggest this paragraph is amended to read:**

**“set clear expectations for the quality of the places to be created and how this can be achieved (such as by taking a landscape-led approach, and following Garden City principles); and ensure that appropriate tools such as masterplans and design codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community”.**

### **3.5 Chapter 8: Promoting healthy and safe communities**

The revised text seeks to clarify existing policy:

New paragraph 92 (b) includes minor changes to help to clarify Government’s expectations for attractive pedestrian and cycle routes. This supports the Building Better Building Beautiful Commission’s recommendations on supporting walkable neighbourhoods.

New paragraph 97 has been amended to emphasise that access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and efforts to address climate change.

#### **Q5. Do you agree with the changes proposed in Chapter 8?**

**Yes. We strongly support these changes.**

**Paragraph 93b) could usefully clarify (perhaps through a footnote) that planning policies and decisions should support the delivery of local strategies which may be led by national bodies, such as Public Health England, Sport England, NHS England, etc.**

**The addition of 'wider benefits' in this paragraph 97 is strongly welcomed. This could be usefully linked by footnote to Paragraph 119a) and b).**

### **3.6 Chapter 9: Promoting sustainable transport**

New paragraph 105 (d) has been amended to support the Building Better, Building Beautiful Commission’s recommendations on encouraging walking and cycling.

New paragraph 109 (c) and supporting footnote 45 has been amended to prevent continuing reliance by some authorities on outdated highways guidance. Our amended wording states that in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that the design of schemes and standards applied reflects current national guidance, including the National Design Guide and National Model Design Code.

#### **Q6. Do you agree with the changes proposed in Chapter 9?**

**Yes. We strongly support these changes.**

**The amendment to footnote 45 is a further useful clarification. The exclusion of Manual for Streets from this footnote and footnote 51 is reasonable in the context of nesting it within the design code, and not creating unnecessary confusion. However, MfS is still a very useful document, and it may be useful to reference it elsewhere, for instance in paragraph 132.**

### **3.7 Chapter 11: Making effective use of land**

New paragraph 124 has been amended to include an emphasis on the role that area-based character assessments, codes and masterplans can play in helping to ensure that land is used efficiently while also creating beautiful and sustainable places.

#### **Q7. Do you agree with the changes proposed in Chapter 11?**

**Yes. We strongly support these changes.**

**Landscape character assessments are essential (not just a helpful tool) to ensure that land is used efficiently, and that development is appropriately located, planned and designed to a high standard in order to create beautiful and sustainable places.**

**This paragraph should include reference to the use of Landscape and Visual Impact Assessment (LVIA) and Landscape Sensitivity Assessments (LSA) for calculating the scale and extent of development, particularly within designated landscape contexts. This could be clarified through a footnote.**

**Under paragraph 124, a consideration of topography and hydrology in character assessment is currently lacking. Analysis of topography, hydrology, including existing levels/soils, etc., is essential to creating efficient site layouts/design, and particularly for the effective delivery of nature-based SuDS.**

### **3.8 Chapter 12: Achieving well-designed places**

New paragraphs 125 and 127 have been amended to include the term “beautiful” in response to the Building Better Building Beautiful Commission’s findings. This supports the Building Better Building Beautiful Commission’s recommendation for an overt focus on beauty in planning policy to ensure the planning system can both encourage beautiful buildings and places and help to prevent ugliness when preparing local plans and taking decisions on planning applications

Paragraph 126 has been amended to clarify the role that neighbourhood planning groups can have in relation to design policies.

Paragraph 127 has been amended to emphasise that all local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code and which reflect local character and design preferences.

A new paragraph 128 has been added in response to the Building Better Building Beautiful Commission’s recommendations and our manifesto commitment to give communities greater say in the design standards set for their area. This reflects the Government’s proposals for a National Model Design Code, which will include a model community engagement process, and will create a framework for local authorities and communities to develop a more consistent approach which reflects the character of each place and local design preferences. It also clarifies that the National Design Guide and the National Model Design Code should also be used to guide decisions on planning applications in the absence of locally produced guides or codes.

A new paragraph 130 has been added to reflect the findings of the Building Better Building Beautiful Commission and the Government’s ambition to ensure that all new streets are tree-lined, and that existing trees are retained wherever possible.

New paragraph 133 responds to the Building Better Building Beautiful Commission’s recommendations to make clear that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design. In addition, it clarifies that significant weight should be given to development which reflects local design policies and government guidance on design.

#### **Q8. Do you agree with the changes proposed in Chapter 12?**

**Yes. We support these changes.**

**The design code policies set out in paras 126-128 are consistent with our understanding of how design codes can/will be successfully used as part of the planning process. We have commented on the content of the National Model Design Code elsewhere.**

**The reference to “effective landscaping” in paragraph 129 should be corrected to “effective landscape design” or “effective landscape works”. Landscaping is the wrong word in this context.**

**The new para 130 (“tree-lined streets”) is a very welcome policy, and we strongly support the stated ambition. In particular, ensuring “the right tree in the right place”, the requirement for long-term maintenance, and the retention of existing trees. We also encourage government to extend this commitment to retrofitting existing streets.**

**However, the statement “working with highways officers and tree officers” should be amended to first-and-foremost state the role of landscape architects. The “right tree in the right place” begins at the design stage, and whilst it may be necessary to consult with both highways and tree officers to identify any site-specific risks and limitations, that will not in-itself achieve the stated aim of good design.**

**The inclusion of trees in streets should always be aligned with SuDS integration as the default option. Combining the two is both more efficient, more effective, and reduces the long-term cost of tree watering/maintenance.**

**The paragraph could also usefully state the role of trees in supporting biodiversity, and the need therefore for connectivity in line with the Lawton Principles.**

**This paragraph could therefore be amended to read:**

***Trees make an important contribution to the character and quality of urban environments, can also help mitigate and adapt to climate change, assist with managing surface water drainage, and contribute to biodiversity networks. Planning policies and decisions should ensure that:***

***- new streets are tree-lined,***

- *that opportunities are taken to incorporate trees elsewhere in developments as part of a wider green infrastructure strategy (such as community orchards, wildlife corridors such as hedges and areas of woodland),*
- *that SuDS integration is considered,*
- *that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and*
- *that existing trees are retained wherever possible.*

*Applicants and local planning authorities should work with landscape architects, local highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards, local water management, and the needs of different users.*

There are a number of additional regulatory and sectoral barriers to achieving tree-lined streets in reality – not least the issue of skills. Green infrastructure and nature-based SuDS (incl. street trees) are both areas where planning enforcement most frequently falls down, as it is relatively easy to put greenery into visualisations for planning applications, but which never materialise on site. These aspects will need to be considered if this policy is to be a success.

**At paragraph 132, the Building with Nature standards framework could usefully be referenced here, alongside Building for Life 12.**

### 3.9 Chapter 14: Meeting the challenge of climate change, flooding and coastal change

The revised text seeks to strengthen environmental policies, including clarifying some aspects of policy concerning planning and flood risk:

The changes proposed are in part, an initial response to the emergent findings of our joint review with the Department for Environment, Food and Rural Affairs (Defra) of planning policy for flood risk. The government’s Policy Statement on flood and coastal erosion risk management sets out a number of actions to maintain and enhance the existing safeguards concerning flood risk in the planning system. Informed by this, we will consider what further measures may be required in the longer term to strengthen planning policy and guidance for proposed development in areas at risk of flooding from all sources when our review concludes.

On planning and flood risk, new paragraphs 160 and 161 have been amended to clarify that the policy applies to all sources of flood risk.

New paragraph 160(c) has been amended to clarify that plans should manage any residual flood risk by using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management).

The Flood Risk Vulnerability Classification has been moved from planning guidance into national planning policy (set out in Annex 3 and referred to in paragraph 162). It is considered that this classification is a key tool and should be contained in national policy.

New paragraph 163 has been amended to clarify the criteria that need to be demonstrated to pass the exception test.

#### **Q10. Do you agree with the changes proposed in Chapter 14?**

**Yes. We strongly support these changes.**

**The amendments made to para 160c are especially welcome. Green infrastructure can make a significant contribution to flood risk management, whilst also delivering a number of other benefits for people and nature.**

**This rewrite presents an opportunity to address errors in paragraphs 166 and 168:**

**Paragraph 166b as nested within paragraph 166 is misleading, as it implies that SuDS are only necessary in areas of flood risk and not generally for all development, when the opposite is the case. The purpose of SuDS is to control surface water runoff from a site and therefore to avoid increasing flood risk downstream. They are unlikely to manage or mitigate existing flood risk conditions on a site unless more robust flood mitigation is also included.**

**Paragraph 168: The majority of planning applications are for minor developments where runoff is not controlled, but their cumulative effect is significant. This potentially leads to increased flood risk, and is particularly likely as these discharges are frequently to sewers. Minor development should therefore also be required to utilise SuDS.**

**Major developments should always utilise SuDS that deliver multiple benefits. Sustainability and green infrastructure are inherent within the NPPF, so opportunities for climate resilience, water supply, biodiversity and amenity are being missed if SuDS are not used for the specific benefits that they can deliver.**

### **3.10 Chapter 15: Conserving and enhancing the natural environment**

New paragraph 175 has been amended in response to the Glover Review of protected landscapes, to clarify that the scale and extent of development within the settings of National Parks and Areas of Outstanding Natural Beauty should be sensitively located and designed so as to avoid adverse impacts on the designated landscapes.

New paragraph 176 has been separated from the preceding paragraph to clarify that this policy applies at the development management stage only.

New paragraph 179(d) has been amended to clarify that development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around other developments should be pursued as an integral part of their design, especially where this can secure measurable net gains for biodiversity and enhance public access to nature.

#### **Q11. Do you agree with the changes proposed in Chapter 15?**

**Yes. We strongly support these changes.**

**Para 175 could also be a useful place to make clear the benefits of Landscape and Visual Impact Assessment (LVIA) and Landscape Sensitivity Assessments (LSA) for calculating the scale and extent of development, particularly within designated landscape contexts.**

### 3.11 Annex 2: Glossary

The definition of “green infrastructure” has been updated to better reflect practice, as already set out in Planning Practice Guidance, published evidence reviews and the new national framework of green infrastructure standards.

The definition of the “Housing Delivery Test” has been amended to reflect the rulebook. This clarifies that the test measures homes delivered in a local authority area against the homes required, using national statistics and local authority data.

#### **Q14. Do you have any comments on the changes to the glossary?**

**We strongly support the improvement to the definition of “green infrastructure”. This now aligns with the definition used by the sector.**

**Given the additions made elsewhere, and the content of the current NMDC, it would be useful to include a definition of “character”, and in particular to be clear a) the use of the term 'character', by itself, can be ambiguous, b) that it includes both urban/townscape character and landscape character, and b) that there are well-established methodologies for assessing both.**

## 4 National Model Design Code

The **National Model Design Code (NMDC)** provides detailed guidance on the production of design codes, guides and policies produced by Local Planning Authorities working with their communities and the industry to promote “successful design”.

The NMDC states that local design codes should be visual and numerical, rather than relying on detailed policy wording; and that they should be drawn up with measurable community support that is appropriate for the scale and location of new development.

Note that the NMDC is not *itself* a design code, but is simply a framework for others to produce their own local codes.

#### **Q15. We would be grateful for your views on the National Model Design Code, in terms of**

- a) the content of the guidance**
- b) the application and use of the guidance**
- c) the approach to community engagement**

### **General comments:**

The ambition behind the National Model Design Code is a good one, and we strongly support the Government's ambitions to raise the standard of design nationally through the planning system.

In general, the Model Design Code is a successful tool, insofar as:

- its principles are broadly correct
- it elevates a range of hitherto under-appreciated design factors
- it facilitates a local process for setting locally-sensitive design frameworks, rather than being a prescriptive code in its own right

However, there are a few areas where the current NMDC can be improved. Specific improvements are grouped under the underlined headings below. In general, we believe:

- A greater level of ambition is needed on integrating green infrastructure wherever possible, and to make multifunctional uses of public spaces and routes, including roads. Greening for wildlife and habitat connections to overcome biodiversity loss, greening spaces (including roads) for exercise, play and contact with nature, to help overcome social exclusion and poor health, and creating multi-functional networks of green infrastructure with SuDS, to replace engineered (grey) infrastructure and hard surfaces and to support the climate resilience of natural systems, should be the norm, not the exception, in response to the current drive to net zero carbon.
- There is an insufficient account taken of **landscape character**, both in the code and the guidance notes. References to context, identity, and character are principally referenced with regard to built form, rather than the underlying landscape and any existing natural features – which should be the starting point for the design process.
- In general, although rural and villages are included as area types, the code is primarily **urban in tone**. This manifests in, for instance, a bias towards sealed surfaces in the movement section. Non-metropolitan planning authorities in particular will have a harder job of utilising this tool, and those are the authorities more likely to be under-resourced with design skills.
- There is insufficient consideration of **play**, and the need for play-friendly spaces generally – for all ages – which extend beyond a Local Equipped Area of Play (LEAP). Whilst there can be a role for 'cordoned off' areas of play equipment, there are many successful examples of more integrated approaches to play, nature, and housing – for instance the Cator Park development in Kidbrooke, a 2020 Landscape Institute Award Winner.

- **SuDS** are nested within nature, when in fact they are designed to be used in all contexts whenever surface water management is required, including (and especially) contexts where wider green space provision is not possible. Similarly, the models of development form do show trees, but should similarly show SuDS; to demonstrate the need for effective integration within all scales of development, and particularly as part of the street scene or road hierarchy, either integrated with the tree planting, or as separate planted features.
- There needs to be more recognition of the need for **long-term flexibility** that can be delivered still within the code. The precedents and parameters on which the design code is based could change very rapidly in the near term with, for example, responses to the climate emergency. Urban density is a particular tension here, and the need for undeveloped land to supply multiple outcomes, including climate resilience, biodiversity enhancement, flood risk management, soil protection and pollination, food production, recreation, etc. This competes directly with low density layouts for housing. In our experience, there is not yet full market and political “buy in” to high density living, although there have been recent successful examples of change (e.g. in Cambridge<sup>2</sup>). Our members cite involvement with the masterplanning of Garden Villages, which may have development programmes lasting 30 or more years. Fixing codes for such future built environments, which may in time have very different drivers, requires acknowledgement that things will inevitably change over time. This need for review and adaptability over longer-term horizons needs to be explicitly written into the code.

#### Throughout: “Landscaping”

- The word ‘landscaping’ should be replaced on page 2 and page 17 with “landscape design” and “landscape works” respectively. “Landscaping” is a verb which does not cover the intended meaning. This would also provide consistency with the terminology used in the National Design Guide.

#### Coding

- We support the coding process as set out on page 5. In particular, we support the stated need for a vision, which is fundamental to the delivery of any well-designed place. There should be an overall place vision (not just for individual coded area types) which can hold the design together throughout the process, provide the intellectual rigour and compelling narrative behind the design solution at every stage.

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<sup>2</sup> <https://www.greatercambridgeplanning.org/media/1252/typologies-and-development-capacity-assessment-2020.pdf>

- There is a role for design review both at design code preparation stage and for specific development proposals. This is important in holding the code true to the vision; without early clarity and rationale, a code or development project can drift. A culture of peer review through design review remains paramount.

### Baseline assessment (Landscape Character)

- The types of baseline analyses included on page 8 are correct; however, the majority of these assessments are not optional to produce a design code – which the word ‘could’ suggests. A design code which is produced without, for example an appropriate and up-to-date character assessment, would not be successful.
- “Local character” should be reworded to state explicitly landscape character, e.g. “Local landscape and/or townscape character”.
- The current *Guidance for Landscape and Visual Impact Assessment (3<sup>rd</sup> ed.)*<sup>3</sup> could be usefully included within the ‘References to Further Guidance’ section.
- It is welcome to see the consideration that has been given within the guidance notes to “Character Studies” (section C.1) and this section is broadly very positive.
- The items included in the guidance at C.1.ii are accurate, and broadly capture the items which would be considered in a Landscape Character Assessment.
- The list at C.1.iii is missing visual amenity and views (both in and out).

### Movement (Green Infrastructure)

- The Design Code needs to go further to promote healthier and more attractive movement corridors with green infrastructure, including SuDS. The Covid-19 pandemic has demonstrated that society uses roads and green spaces more frequently for walking, cycling, play and exercise when car access is reduced and planting is increased.
- The Movement section makes no reference to air pollution caused by vehicular travel, nor the possible methods to mitigate this through design. Planting of green infrastructure should be used to screen pedestrians and cyclists from both noise and air pollution, absorb particulates/hydrocarbons, and help manage possibly-polluted surface water run-off.
- This section is focussed generally on hard urban landscapes. Whilst sealed surfaces tend to be generally appropriate for car and cycle travel in that context, permeable surfaces should be the default option in suburban, rural and less-trafficked locations.

### Nature

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<sup>3</sup> <https://www.landscapeinstitute.org/technical/glvia3-panel/>

- Stronger wording is required throughout this section. Some of the principles fall short of even existing local plan policies in (see for instance, the new London Plan) especially on SuDS and urban greening.
- Neither Natural Capital nor Ecosystem Services are referenced.
- N2.ii Section 73: Stronger wording is required to push developers to create 'green over grey' systems (the latter of which is often the chosen solution). Nature-based (green) SuDS should be the first 'design principle' established on site and used to create high-quality amenity spaces, which provide added benefits for biodiversity, climate change resilience and public health.
- Stronger wording is required on the retention of existing trees and hedgerows in urban/suburban settings. Established trees and hedges may provide 50-300 years of growth and maturity with the ability to combat climate change, CO2 absorption, water retention and mitigate 'urban heat island' effect. Unless a tree is granted a Protection Order, the trees often are secondary to design development – and this should be reversed.

#### Public spaces

- Generally the tone of this section is somewhat dated, and in places inconsistent with the more sustainable principles set out under 'Nature'. It is appreciated that streets are included in this sub-section; however the diagrams of street dimensions indicate that the guidance still seeks to prioritise vehicle movement over social activities and health.
- Again, the role of public spaces has changed significantly during the Covid-19 pandemic and recent winter storms. The guidance needs to make greater reference to the benefits of parks and public spaces for delivering a range of social and public health functions and ecosystem services, including the delivery of biodiversity net gain and linking habitats, and natural flood water management.

#### Community engagement

- We are pleased to see the priority given to community involvement in developing design codes – however this would be a good place to raise the standard of activity in this area. Community engagement if done poorly can be detrimental to both good design and the buy-in of existing communities. The majority of users are time-poor and unlikely to engage proactively in old-fashioned models of community engagement (i.e. sitting in rooms looking at complicated maps). Some models of community engagement can entrench existing socio-economic inequalities and generational divides, when it is only those with time to give who are consulted.

- There are many recent innovative examples of co-design and community engagement processes: such as pop-up venues and pocket parks, combining consultation with other activities, arts-based approaches, mobile phone engagement, and/or considering benefits for engagement (e.g. free childcare). The design code/guidance notes could make reference to these, or at least update the visuals to include better examples.

## 5 Who we are

The Landscape Institute (LI) is the royal chartered body for the landscape profession. We represent over 5500 landscape architects, landscape planners, urban designers, and landscape and parks managers.

As a professional organisation and educational charity, we provide training, accreditation, technical advice, and standards to maintain the high quality of the landscape profession in the UK. We protect and enhance the built and natural environment for the public benefit.