

Matthew Carmona

53. Coordinating codes, the right tool for the job!

In an earlier post ([49. \(https://matthew-carmona.com/2016/01/02/permission-in-principle-but-not-without-principles/\)](https://matthew-carmona.com/2016/01/02/permission-in-principle-but-not-without-principles/)) I examined the proposals advanced in the Housing and Planning Act that aim at moving towards a new means of permitting development via 'Permission in Principle' (PiP) relating to sites on a register of brownfield land or otherwise identified in the development plan. The new system will in effect give advanced approval to housing projects up and down the country long before fundamental design or a wide range of other material considerations are ever considered. It will do this on the basis of a red line around a site and some crude evaluation of the quantum of housing that the site can accommodate.

As soon as this new system was mooted, it raised the big question in my mind about how will place quality be guaranteed under such a system. Also, how would the vital support of communities be garnered when they are, in effect, presented with a done deal long before they ever get a chance to comment. The Act itself (in Clause 150) makes provision for a new process of 'Technical details consent' to be determined in accordance with PiP, and PiP plus the technical details consent will represent the planning permission. This, however, raises a number of concerns:





- First, the nature and shape of the place that is being created is not a 'technical detail', but is instead a fundamental part of the process of assessing a planning application. Without proper consideration of the fundamental design considerations that relate to matters such as height, density, landscape, layout, connectivity and so forth, and what this means for how uses and spaces are distributed on a site, it is impossible to properly determine whether a proposal for development is or is not suitable for a site.
- Second, it is very difficult to assess the quantum of development appropriate for a site and the right mix of uses (both issues that the legislation proposes should be decided at PiP stage), without having due regard to how this will actually be delivered. Will it, for example, be stacked up high in a single tower, laid out in streets, or perhaps distributed in a series of detached units?
- Third, communities will quite rightly be resistant to the giving of Permission in Principle to new development without having any sense of what that would mean on the ground and how it might effect the surrounding context and properties. What is envisaged may actually increase rather than decrease local resistance to development.

The coordinating code, a possible solution

Taking as a starting point three aims of i) streamlining the process of securing consent to develop, ii) increasing certainty for developers and investors, and iii) maintaining a focus on quality outcomes; I argued previously that it may be possible to combine the designation of PiP with the production of a design code for each allocated site. Design codes are tools that establish the key urban design parameters for a site with a particular focus on making the place, but without the requirement for a fixed and detailed masterplan. Their use is encouraged in paragraph 59 of the NPPF.

Since then I have been working on what the nature of such a code would be, and, working with Studio REAL have developed the idea of a Coordinating code. This would be a slimmed down and very simple code that (preferably on a single A3 sheet) would establish the critical principles for making the place.

SITE OPPORTUNITIES AND CONSTRAINTS

community and land use	 <p>Centrally located site with allocation H15 in Local Plan (1) With 5-10 minutes walk of shops, services, employment and parks (2) Located on strategic road network and within walking distance of railway station (3) Surrounded by residential development of varied quality and character (4) >> Central and accessible location suitable for live-work units >> Surrounding area is fragmented and has no uniform character. The development needs to establish its own identity</p>	landscape setting	 <p>Sloping site falling towards the north east with views towards the town centre (1) Established woodland along southwest boundary. This forms a buffer and barrier between southwesterly neighbourhoods and the site / town centre (2) Several mature trees within site boundaries (3) >> Street pattern to follow topography >> Retain views towards the town centre >> Integrate woodland in development to enhance character and connect with surrounding neighbourhoods >> Retain existing trees as indicated</p>
movement	 <p>No direct street frontage, access through "gaps" in building line to north (1) A network of footpaths runs along the site boundary, but do not connect through the site; site forms a barrier between town centre and neighbourhoods to the southwest (2) >> Vehicular access from residential street to north >> Connect internal streets and paths to surrounding footpaths to facilitate through movement and improve connectivity of surrounding neighbourhoods</p>	built form	 <p>Housing type and orientation of surrounding development varies and needs appropriate response: >> Back gardens with minimum 10m depth to respect privacy of existing family dwellings (1) >> Pull back from boundary to avoid overlooking and overshadowing from 4-5 storey apartment blocks (2) >> Position homes to overlook woods (3) >> Position buildings to allow views through to town centre (4) >> Opportunity for triangular green at the centre of the site to address shift in alignment (5)</p>

CO-ORDINATING CODE

	<p>New streets and footpaths aligned to follow contours, and create convenient and legible routes linking the site with the surrounding development thus improving access to the town centre for residents in existing neighbourhoods to southwest (1)</p> <p>Position homes to overlook routes and appropriate in scale and character to development along the site edges: - Area for 2-3 storey family housing (2) including: Terraced housing backing onto existing family housing; back gardens with minimum depth of 10m (2a) Homes orientated towards the woodlands to benefit from setting and improve security of woodland paths (2b)</p> <p>- Area for higher density development up to 6 storeys (3) with: Set back and buffer with apartment blocks to south (3a) - Triangular green space in centre of the site to accommodate shift in grid alignment and create focal point for community (4) - Retain long views (5) - Retain key mature trees in high quality setting (woodland extension and central green) (6) - Opportunity for landmark building up to 8 storeys to further strengthen identity of the development (7)</p>
--	--

**BROWNFIELD SITE
CO-ORDINATING CODE**



INDICATIVE COORDINATING CODE

As shown in the indicative example they would:

1. Focus on the four 'place' issues that are common to almost all sites: community and land use; landscape setting; movement; and built form / massing issues
2. Contain minimal text that describes only these fundamental design parameters and that 'fixes' the expected design response
3. Illustrate, through a simple plan graphic, the design concept in two dimensional terms in order that the essential parameters of place are fully understood.

In effect this would bring a proper consideration of fundamental (not detailed) design and place quality concerns forward in order to streamline the technical consents process later on. It would guarantee a level of quality to give certainty to both developers and local communities about what the development would entail, and would provide a basis against which to make an estimate of the number of dwellings that the site would be likely to support. Finally it would help to avoid increased community opposition to proposals as communities would have a much better idea of what they are being asked to support.

Coordinating codes would be simple, quick and easy to prepare (the example took two days) either by local authorities in-house, by consultants, or developers promoting a particular site. And, because they would be site specific (not generic) and clear and easy to understand, the qualities they espouse could be subject to public engagement early in the development process and would help to ensure a greater focus on securing early agreement about the need for high quality new development.

Small (and simple) is beautiful

Whilst the Government have yet to fully embrace the idea (although have made warm noises about using codes with PiP in the House of Lords and elsewhere), the Federation of Master Builders (FMB) who represent small housebuilders up and down the country, have not been so reticent. Indeed, just before Christmas they published an important new report – [Small is Beautiful](http://www.lgiu.org.uk/wp-content/uploads/2016/12/Small-is-beautiful.pdf) (<http://www.lgiu.org.uk/wp-content/uploads/2016/12/Small-is-beautiful.pdf>) – that examines the potential to deliver on small sites and, in this process, to fully release the potential of SME builders once again.

The report strongly endorses the idea of using coordinating codes and argues that they have the potential “to reduce the uncertainties around bringing forward applications for small sites” (whether or whether not associated with PiP). They suggest:

“coordinating codes are similar to design codes, but slimmed down and simplified to be applied quickly to specific sites, or groups of sites at the neighbourhood level. They demonstrate the fundamental (but not detailed or prescriptive) design parameters with minimal text and simple graphics. They provide clarity and agreement over what is expected at the outset of a project”.

When surveyed, a clear majority of the FMB’s members suggested that they would be ‘open’ or ‘very open’ to the use of such codes. For me this is an idea whose time has come. We desperately need to make planning propositional once again, reviving the role of planning as a positive, confident and proactive force for change. We also need to do this in a manner that is flexible (whilst increasing certainty), brings communities along with the proposals, and that doesn’t break the bank to prepare. The coordinating code is quite simply the right tool for the job!

Matthew Carmona

Professor of Planning & Urban Design

Bartlett School of Planning, UCL

m.carmona@ucl.ac.uk (<mailto:m.carmona@ucl.ac.uk>)

January 2017

JANUARY 27, 2017 BY MATTHEW CARMONA COORDINATING CODE, DESIGN CODES, PERMISSION IN PRINCIPLE

±