DESIGN AND PLACEMAKING PLANNING PRACTICE GUIDANCE (PPG)

ACE Response to MHLCG Consultation

Summary

ACE welcomes the consolidation of the Design and Placemaking Planning Practice Guidance (PPG) into a single, clearer framework. ACE members agree that this will strengthen the role of design quality within the planning system. To compliment this, the introduction of the 'seven features of well-designed places' is particularly supported as a practical structure for translating national design policy into plan-making and decision-taking.

ACE notes that placemaking outcomes often take many years to emerge and recommends that the guidance be treated as a living document, supported by ongoing engagement between government, industry and local authorities to review implementation and incorporate emerging best practice.

ACE's response underscores the critical need for clearer alignment between the PPG and existing technical infrastructure guidance, such as highway and utilities standards, which can strongly influence urban form. Greater cross-government coordination is recommended to ensure infrastructure delivery supports placemaking objectives. Clarity is also needed on which standards take precedent and how they synergise with each other. Without clear direction as to which guidance supersedes the other, Local Authorities may revert back to known behaviour.

ACE members are also concerned about capacity and procurement challenges within local authorities; the importance of skills, resources and training is critical to enforcing design standards effectively on developers.

Finally, ACE supports the use of model design codes to accelerate local code preparation, provided they are adaptable, regularly updated and maintain exceptionally strong design quality standards. Additional tools, such as digital design catalogues, automated rule-checking, precedent libraries and training programmes, could further support consistent, high-quality placemaking outcomes.

Do you agree that the usability and effectiveness of the draft Design and Placemaking PPG has improved?

ACE welcomes the review of the Planning Practice Guidance (PPG) on Design and Placemaking and the consolidation of previously separate guidance into a single, coherent framework. This is a positive step which strengthens the prominence of design quality and placemaking within the planning system and provides greater clarity for practitioners and decision-makers.

Our members particularly welcome the articulation of the 'seven features of well-designed places', which provide a helpful structure for translating national design policy into practical considerations for plan-making and decision-taking. The emphasis placed on movement is especially important. Recognising the role of active travel alongside public transport, including rail, and the continued role of the car reflects the need for well-designed places to accommodate a range of transport modes while supporting more sustainable patterns of movement.

It is important to recognise, however, that the outcomes of urban design policy are often realised over long timescales. The success of placemaking interventions may take a decade or more to become fully evident.

In this context, ACE encourages MHCLG to establish periodic engagement with industry, local authorities and communities to review how the guidance is being applied in practice and whether it is delivering the intended outcomes. This could take the form in trial partnership local authorities to test run governance and implementation of revised standards to inform any revised guidance. Such engagement would enable the Department to capture lessons from implementation, identify areas where further clarification may be beneficial, and reflect emerging best practice. Given the wide multi-disciplinary audience that will rely on

this guidance, ACE recommends that the PPG is treated as a living document, capable of being updated and refined over time in response to feedback and experience from across the sector.

Are there any aspects where clarity, accessibility, or practical application could be improved to better support design and placemaking outcomes?

MHCLG should also be mindful of how the Design and Placemaking PPG interacts with existing technical engineering guidance. Many of these documents are highly prescriptive regarding the geometry, layout and format of infrastructure such as streets, utilities and drainage systems, meaning they can effectively function as de facto urban design guidance. As MHCLG seeks to consolidate and streamline existing guidance, it should consider the potential for overlapping or competing infrastructure guidance and provide a clear hierarchy or direction on how these should be applied.

There should also be a coordinated, cross-government effort to ensure that those responsible for enforcing highway design standards and those involved in urban design, landscape design and placemaking are not operating in isolation. Greater coordination would help address recurring issues such as poor-quality road design affecting access to housing sites, particularly during periods of adverse weather. Some local authorities have already taken steps to provide clearer and more coherent highway design guidance, such as Surrey County Council, and these initiatives should be recognised and encouraged.

This approach could be broadened to include other essential services, including utilities. Guidance on the installation and maintenance of utilities can have significant knock-on effects on the quality of placemaking. For example, some local authorities effectively restrict street tree planting by applying exclusion zones around underground utilities such as water pipes, to allow for potential maintenance works. MHCLG and local authorities should consider engaging more closely with utilities companies to ensure that their practices align with wider ambitions around beauty, urban greening and high-quality placemaking.

Attention should also be given to procurement practices within local authorities. If procurement processes do not adequately prioritise design quality, the outcomes intended by the PPG may not be achieved. A comparable example can be seen in the quality of pothole repairs, where inadequate workmanship or the use of inappropriate materials often leads to repeated repairs and poor long-term outcomes.

The capacity, skills and resources available within local authorities are fundamental to achieving successful design and placemaking outcomes. ACE members frequently report that some local authority officers lack the specialist training needed to enforce existing standards and work with their counterparts in different tiers of local government effectively, which can allow developers and contractors to deliver substandard outcomes.

As multidisciplinary engineering and design consultancies, ACE members are well placed to support local authorities as private sector partners, helping to address capacity gaps within planning and procurement teams and supporting the timely delivery of high-quality development.

Case Study: Welborne Garden Village, AECOM

Welborne Garden Village, which is being developed by Master Developer Buckland Development Ltd, is succeeding in overcoming the technical challenges around street design and adoption and particularly in terms of the planting of substantial street trees.

This approach included an ambitious Garden Community vison characterised by tree lined streets, homes with generous gardens and set within an extensive network of parklands and public open spaces.

CGI image of Dashwood Avenue at Welborne Garden Village (credit - Ben Pentreath)

This vision was developed by ACE Member AECOM who led the Masterplanning and Landscape design on the project for 10 years up to the grant of Outline Planning Permission in 2018. As part of the engagement with the Local Planning Authority (LPA) the need for a Street Design Manual was identified which was developed by Andrew Cameron Associates alongside the development of the Strategic Design Codes by Town Architect Ben Pentreath.

Learning from this experience AECOM prepared a Street Design and Adoption Manual (SDAM) at Brookleigh (Burgess Hill) to support Homes England in the accelerated delivery of a 3,500 home new community in West Sussex. The Street Design and Adoption Manual was prepared with Andrew Cameron Associates and included extensive engagement with Mid Sussex District Council as LPA and West Sussex County Council as Highway Authority.

The purpose of the SDAM was to ensure a high quality and consistent approach to street and public realm design across a multi-phase project by agreeing the design principles and standards to be followed at the outset. This is also intended to support accelerated delivery by avoiding the need to revisit the acceptability of design approaches in every phase of the project. The Brookleigh SDAM was shared as a good practice example at an Urban Design Learning seminar in 2024.

Do you agree that the principles set out in the draft Design and Placemaking PPG adequately address the needs and requirements of traveller sites?

{No response}

What additional considerations or clarifications might be necessary to ensure planning practice guidance supports inclusive and culturally appropriate design and placemaking?

{No response}

Do you agree that tools, such as model design codes, could speed up the preparation of local design codes?

ACE members agree that model design codes can materially speed up preparation of local design codes, provided they are implemented as high-quality, adaptable starting points rather than one-size-fits-all templates. Participants emphasised that:

- **Consistency and structure:** Model codes offer a shared reference framework, bringing structure to local work and reducing re-invention—particularly valuable given variable design experience within local authorities.
- **Multi-scalar coherence:** They are most effective when clearly organised across scales—from district-wide principles through to local and neighbourhood calibration—so authorities can "go straight to" the relevant layer and rapidly tailor it.
- **Quality and currency:** Model codes should be well-populated with robust, context-diverse exemplars and maintained as living documents that are regularly updated to reflect new technologies and evolving best practice.
- **Balance of prescription and flexibility:** Authorities need the ability to be prescriptive where necessary (e.g. key street sections, accessibility standards, interface rules) while remaining flexible where innovation, phasing, and changing user needs warrant it.
- **Design quality as the safeguard:** Acceleration must not come at the expense of place quality. ACE members caution that densification without strong design controls can undermine character and liveability. Model codes can mitigate this risk by embedding clear quality thresholds, transitions, and typology guidance.

In short, model design codes are a useful accelerator and quality check, especially in a resource-constrained system, if they are modular, up-to-date, and designed for calibration across geographies and scales.

What other tools would support this?

To complement model codes and ensure speed does not dilute quality, participants proposed a set of **digital, capacity, and policy tools**:

National Digital Catalogues
- A curated, online catalogue of code modules (e.g. street types, block and plot rules, mixed-use typologies, frontage/threshold standards), each with worked examples and annotations.
- Machine-readable, version-controlled formats to enable local authorities to "take off the shelf," adapt, and publish quickly with pre-approved planning permission.
- A "comply-through-code" pathway: where proposals that meet the standards contained within national digital catalogues and relevant national policy tests could be streamlined or automatically approved by local authority planning departments.

Rule-Checking and Validation Tools
- Automated rule-checkers that test schemes against geometric and performance rules in the code (e.g. heights/step-backs, sunlight/daylight envelopes, active frontage ratios, accessibility routes, cycle parking standards).
- Submission templates that standardise how applicants evidence compliance, reducing officer time and ambiguity.

Exemplar and Precedent Library (National Design Library)
- A curated precedent library which draws on UK and international good practice, licensed for reuse in local codes.

- Cross-regional learning (e.g. what works in different contexts such as Scotland, the Southeast, urban extensions, small towns), with transparent evidence of outcomes and delivery conditions.

Capacity-Building and Skills Support
- Funded training for local authority officers on code preparation, calibration, enforcement, and the appropriate balance between guidance and binding code provisions.
- Secondments to share expertise across authorities and raise baseline competency.

Densification Playbook and Clear Metrics
- A dedicated densification toolkit to accompany model codes, including:
  - Clear distinctions between net, gross, and typology-based density and how each should be used in plan-making and development management.
  - "Gentle density" typologies (e.g. perimeter blocks, mansion blocks, mews/terraces, mid-rise) with rules for gradation and transitions, especially near transport hubs, to avoid isolated tall buildings and abrupt step-changes.
  - Station-area design frameworks that set context-sensitive height, massing, interface, and public realm requirements, preventing an over-reliance on tall buildings and high-rise flats as the sole route to meeting targets.
  - Mobility and carbon considerations integrated into the code (walkability, public transport capacity, last-mile logistics, car-lite design), recognising that density, movement, and emissions are interdependent.

Quality Assurance and Monitoring
- Design quality checklists embedded in codes (materials, facade articulation, threshold conditions, landscape and microclimate, inclusive access).
- Post-occupancy evaluation and feedback loops that feed into the living national catalogue and local updates, ensuring continuous improvement rather than static documents.

Engagement and Co-Design Toolkits
- Plain-language, visual toolkits and digital engagement platforms that allow communities to understand and shape local calibration of the model code, building legitimacy and reducing later conflict.