

CONSULTATION RESPONSE FORM

Design in the Planning Process

We want your views on how we can support our national planning policy on design and facilitate the delivery of good design through the planning system.

Please submit your comments by **16 January 2015**

Data Protection

Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about. It may also be seen by other Welsh Government staff to help them plan future consultations.

The Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. This helps to show that the consultation was carried out properly. If you do not want your name or address published, please tick the box below. We will then blank them out.

Names or addresses we blank out might still get published later, though we do not think this would happen very often. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including the Welsh Government. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published. We would get in touch with the person and ask their views before we finally decided to reveal the information.

Confidentiality

Responses to consultations may be made public on the internet or in a report.

If you do not want your name and address to be shown on any documents we produce please indicate here

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Design in the Planning Process (Consultation)

Date: 6 October 2014 - 16 January 2015

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Type <i>(please select one from the following)</i>	Business	<input type="checkbox"/>
	Local Planning Authority	<input checked="" type="checkbox"/>
	Government Agency / Other Public Sector	<input type="checkbox"/>
	Professional Body / Interest Group	<input type="checkbox"/>
	Voluntary sector (community groups, volunteers, self-help groups, co-operatives, enterprises, religious, not for profit organisations)	<input type="checkbox"/>
	Other (other groups not listed above)	<input type="checkbox"/>

Q1	Design Quality	X
	Is the planning system effectively delivering the five key objectives of good design? Give reasons for your answer.	
	Yes	
	Neither Yes nor No	X
	No	

Q1	Further Comments
<p>Particularly since the economic downturn, there has been a reluctance for developers to embrace good design, with the emphasis on maximising development rather than achieving a well-considered layout; there is also a lack of support for promoting good design at appeal. The added value of good design and layout to the future occupiers of a development seems to be of limited interest to much of the development industry.</p>	

Q2	Local Development Plans	X
	Do you agree that a national development management policy on design would be beneficial?	
	Yes	
	Neither Yes nor No	
	No	X

Q2	Further Comments
<p>A national development management policy would help to ensure that matters of generic design were not the focus of consultation and examination, thereby helping to ensure a more streamlined LDP and plan review process.</p> <p>However, many design matters are locally specific and as such could not be accurately reflected in a national generic policy. Local area specific design policies remain necessary, supplemented by more detailed design guides.</p> <p>Indeed, emerging Welsh Government guidance states that LDPs should include topic based policies on a range of matters, including design, setting out criteria against which planning</p>	

applications will be considered. The guidance further states that LDPs should not repeat national policy on these matters but include specific local application (Consultation Draft LDP Manual, 2014, para 2.4.1). It would be useful for the Welsh Government to clarify its position in regard to the use of national and local development management design policies in LDPs.

Q3	Supplementary Planning Guidance	X
	Are area and site specific plans, such as masterplans, being used to positively plan for key development? Can you highlight areas of good practice?	
	Yes	
	Neither Yes nor No	X
	No	

Q3	Further Comments
	<p>Area and site specific plans, including masterplans, can be very useful tools to guide development in key areas and/or provide detailed guidance on the way strategic sites should be developed.</p> <p>However, it is unclear whether area and site specific plans are being used sufficiently to positively plan for key development. A lack of resources and appropriate urban design skills are key barriers preventing local planning authorities from preparing masterplans, design guides etc.</p> <p>Strategic sites are the subject of detailed consultation and examination through the LDP process, providing the principle for development. The planning application process itself provides a further forum for participation on detailed matters, including design. Reference to the level of engagement necessary for site specific masterplans could be usefully made by the Welsh Government in any future review of design guidance.</p> <p>Masterplanning can provide the bridge between the LDP and the proposed statutory community consultation prior to submission of a planning application. However, the time required in the preparation and consultation on a masterplan can often impact negatively on the speed of the development process and site delivery.</p>

Q4	Supplementary Planning Guidance	X
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	Do you agree that the Welsh Government should produce practice guidance on the process of site analysis to inform the development of well designed proposals?	
	Yes	x
	Neither Yes nor No	
	No	

Q4 Further Comments

Agree that it would useful for the Welsh Government to produce practice guidance on the process of site analysis to inform the development of well-designed proposals. However, the proposed content of such guidance is unclear.

Raising skill levels in this area is considered essential in raising standards of design. There is a lack of urban design professionals within local planning authorities, with a lack of resources available to finance such work. Training to supplement and develop site analysis is hence welcomed, being advantageous to local authority planners in both Development Planning and Development Management, elected Members and the development industry.

However, it should also be recognised that decisions are taken within a context of competing priorities, where design matters are only one consideration to be balanced against other considerations including viability, provision of affordable housing and, ensuring five year land supply housing targets are met.

Q5 Front Loading / Pre-applications

How can we ensure that pre-application discussions assist in the improvement of design quality and inclusive access of development? Can you highlight areas of good practice?

This Authority uses pre-application discussions to raise the issue of good, inclusive design with the prospective developer. There is also a bi-weekly group session involving the Team's Development Management officers to discuss more complex pre-application cases as a group learning exercise, to problem solve and to develop consistency in our approach to the consideration of applications.

Q6

Planning Applications

Other than further training or additional practice guidance what additional tools would assist you in assessing the quality of design in planning proposals?

DCfW could provide streamlined design advice in writing (without the need for a Design Review Panel) to either the applicant or the LPA at pre-application stage or during the application process. This could be limited to major developments to reduce the scope for consultation.

Q7

Access

Do you agree that the amendments to the 1APP form will ensure inclusive access issues are considered in development proposals?

X

Yes

Neither Yes nor No

X

No

Q7

Further Comments

The inclusion on the 1APP form would be helpful (as applications could be made invalid without such information being included), but inclusive design is still likely to be a bolt-on approach for many applicants rather than being considered at the outset.

Q8

Access

What information or other measure would assist local planning authorities assess planning proposals in terms of inclusive access?

It would be advisable to maintain DASs for major built development and new / alterations to public buildings.

Q9

Design Commission for Wales and Planning Advisory and Improvement Service

How can the PAIS and DCfW mainstream good design and inclusive access in the planning process?

See response Q's 6 and 10

Q10

Design Skills and Good Practice

How can we continue to raise the design skills of local authority officers and members and what further specific training is required?

Joint officer/ Member training on design topics – e.g. new housing layouts, would be very useful. This would probably be best taking place on a regional basis.

Q11

Design Skills and Good Practice

Is there scope for local planning authorities to work differently or more collaboratively on design issues? Do you know of any existing activity in this area?

X

Yes

X

Neither Yes nor No

No

Q11

Further Comments

MCC's Conservation staff have assisted neighbouring authorities in dealing with listed building applications and conservation area advice, where resources have been lacking in those authorities (and where our own team's resources have allowed).

Q12 Design Skills and Good Practice

Can you highlight areas of good practice, from Wales or elsewhere, relating to any of the above, which promote and/or lead to the achievement of good design and inclusive access?

The Council's relatively new Green Infrastructure (GI) policy in the Monmouthshire LDP (GI1), is beginning to work well and will add value to a site by way provision of open, accessible open spaces which also function as areas for wildlife and sustainable drainage. This has been put into practice in a major housing site at Penperlleni granted consent subject to a s.106 agreement.

Q13 Design and Access Statements

Are there any benefits in retaining the requirement for Design and Access Statements for particular applications?

X

Yes

X

Neither Yes nor No

No

Q13 Further Comments

See response to Q. 8.

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Q14	Design and Access Statements	X
	Should the mandatory requirement for Design and Access Statements be removed from secondary legislation? Give reasons for your answer.	
	Yes	
	Neither Yes nor No	X
	No	

Q14	Further Comments
See responses to Q's 8 & 13.	

Q15	Any Other Comments
We have asked a number of specific questions. If you have any related issues or ways which design can be improved through the planning system which we have not specifically addressed, please let us know.	
No further comments.	

How to respond

Please submit your comments by **16 January 2015** in any of the following ways:

E-mail	Post
<p>Please complete the consultation form and send it to: planconsultations-a@wales.gsi.gov.uk / planconsultations-a@cymru.gsi.gov.uk [Please include 'Design in the Planning Process Consultation' in the subject line]</p>	<p>Please complete the consultation form and send it to: Design Consultation Planning Policy Branch Planning Division Welsh Government Cathays Park Cardiff CF10 3NQ</p>

Additional information
<p>If you have any queries about this consultation, please:</p> <p>E-mail: max.hampton@wales.gsi.gov.uk</p> <p>Telephone: Max Hampton on 02920 82 6166</p>