

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 If someone has asked for their name and address not to be published, that is an important fact we would take into account.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be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published.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 x

If you do not want your response to be shown in any document we produce please indicate here

CONSULTATION RESPONSE FORM

Design in the Planning Process (Consultation)

Date: 6 October 2014 - 16 January 2015

Name		
Organisation	Llandaff Society	
Address		
E-mail address		
Telephone		
Type <i>(please select one from the following)</i>	Business	<input type="checkbox"/>
	Local Planning Authority	<input 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)	X <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	
	No	X

Q1	Further Comments
<p>Design policies are vital to ensuring good quality outcomes but need a process for ensuring that aspirations are translated on the ground. The Llandaff Society supports high standards of design but considers from the example of the many applications it reviews each month that applicants need more encouragement to consider design from the outset.</p> <p>The Welsh Government an signal this by requiring applicants to prepare a Design Statement (DS). This would be useful for all applications, but is VITAL for all major ones, and for those in Conservation Areas and for Listed Buildings. The requirement should be proportionate to the scale and likely impacts of the development proposed, and should not be onerous to prepare. A DS would provide a means for planning authorities and consultees to test the process and reasoning behind adopting the design chosen by applicants for their planning application.</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	X
	No	

Q2	Further Comments
<p>Good design is only truly meaningful in context because what is appropriate in one location is not necessarily right for another. To remove design issues entirely from LDPs would be retrograde move because high level policies cannot prescribe requirements that are likely to differ markedly for example between Northwest and Southeast Wales.</p>	

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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>Masterplans are starting to be used for example for major new development areas in North West Cardiff. Experience of these to date is not good. They cannot be used to plan at detailed level when the higher level requirements eg for infrastructure are unclear and insufficient. Thus Llandaff Society has grave concerns about the increasing reliance on Masterplans developed by applicants and then used as a framework for assessing their own proposals. This removes a key element of objectivity from decision-making, and risks putting private interests before the public interest which is a pillar of primary legislation.</p> <p>Unfortunately we cannot highlight any areas of good practice.</p>		

Q4	Supplementary Planning Guidance	X
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

It would b helpful for there to be practice guidance on site analysis, but the main safeguard should be a requirement for Masterplans to be subject to public consultation and adoption as SPG before planning applications that depend on them are approved.

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?

Pre-application discussions will only assist in improving design quality if the process is genuine, and starts early enough to enable constrictive suggestions to be incorporated. The Welsh Government receives advice on design issues from DCfW, but DCfW see only a small fraction of the proposals coming forward. We need much more emphasis on design quality from Government, and support from the Planning Inspectorate on appeal for LPA rejection of poorly designed proposals.

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?

Design Statements

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	
	No	X

Q7	Further Comments
	<p>Not necessarily. We are aware of examples of private sector building control agents signing off developments which do not meet DDA requirements. Means of access (and thus inclusive access) is an important design issue and whilst most of the technical aspects are better dealt with under building control Llandaff Society considers that a Design Statement covering all aspects of design including inclusive access should continue to be required by planning law and planning policy.</p>

Q8	Access	
	What information or other measure would assist local planning authorities assess planning proposals in terms of inclusive access?	
	See answer to Q7 above.	

Q9	Design Commission for Wales and Planning Advisory and Improvement Service	
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How can the PAIS and DCfW mainstream good design and inclusive access in the planning process?

PAIS and DCfW need to target planners in the private sector who advise clients who wish to develop in Wales, as well as those in local authorities and the voluntary sector who advise decision-makers.

All would benefit from strong national and local design policies in PPW, LDPs and SPG and from Ministerial decisions which reflect the value of high quality design to the Welsh economy, and the negative impact that a poor quality environment can have on inward investment.

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?

Education and training is needed - in schools and colleges as well as in local authorities, government agencies and businesses - which emphasises the process requirements of good design, and that introduces design concepts in an accessible way. Examples of good and bad design and impact on property values and on perceptions would be helpful.

Good design needn't mean higher cost.

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?

Yes

Neither Yes nor No

X

X

No	

Q11 Further Comments

Collaboration to share design skills could be useful, particularly as LPA budgets are being cut and Conservation posts are being deleted. However, there is only so much that one person can do. We are dismayed that Cardiff Council can now only afford to employ one part-time Conservation Officer who has to cover policy and development for the whole Capital City – this is disgraceful and should be addressed as a matter of urgency. It makes it even more important to retain high design aspirations in policy and legislation.

The work of the DCfW and Cadw are examples of good practice. PAIS will have a big job to raise standards when resources are so thin.

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 work of DCfW and Cadw. Both need to continue to be supported, and PAIS needs to cover all the ground that they cannot – a huge ask!

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

As stated above, there needs to be a more systematic way of ensuring that design is assessed for all planning applications. This implies retention of the design element of D&AS for all applications, or at the very least for all major applications, those in Conservation Areas, and applications involving - or impacting on - Listed Buildings.

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	
	No	X

Q14 Further Comments

No, neither should it be removed from primary legislation. The reasons are obvious:
(i) people take more notice of a statutory requirement than a policy one,
(ii) design is fundamental to the quality of environments, and
(iii) the quality of the environment has a proven link to health and well-being.

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.

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

If you have any queries about this consultation, please:

E-mail: max.hampton@wales.gsi.gov.uk

Telephone: Max Hampton on 02920 82 6166