

Government Review of Planning Practice Guidance

Design Council Consultation Response

15/02/2013

The Design Council is an enterprising charity that enables people to use design to stimulate innovation and business, tackle complex social issues, drive public service efficiency and improve the built environment. Over the last eleven years the Cabe team has strengthened capacity and offered expert advice on national planning policy to ensure that good quality, well-designed places are secured through the planning system.

The breadth of our knowledge and experience is reflected in our diverse and rich portfolio of work, which over the last two years has included support in neighbourhood planning, Local Plan making, the London 2012 Olympic Park and Crossrail.

Summary

The Design Council welcomes the review of Planning Practice Guidance. The Review provides an opportunity to set out a clear, consistent framework that will assist all participants in the planning system deliver quality places through the planning system.

The new Government Planning Practice Guide must reflect the core planning principles set out in the National Planning Policy Framework (NPPF) which includes securing 'high quality design'. It is a mistake simply to justify cancelling design guidance as it is well understood or that it is common practice. Instead this suggests that present guidance is working and there is a serious risk that cancelling existing guidance without issuing a replacement will undermine objectives set out in the NPPF.

The Design Council along with other industry stakeholders such as the RIBA, the Landscape Institute and Urban Design London believe that it should include specific design guidance to clarify the interpretation and delivery of the design quality aspirations set out within the NPPF, enabling plan makers and decision takers to deliver high quality development through good design.

In oral evidence to the CLG select committee inquiry on the review of Planning Practice Guidance Lord Taylor stated that government did not have the resource or expertise to produce design guidance and that the Design Council was well placed to offer its expertise and advice on the new guidance suite. We stand ready and willing to do this.

We therefore urge CLG to support and use a working group made up of relevant professional organisations and industry experts to help it draft consolidated design related planning guidance to support the NPPF policies.' As stated in the CLG select committee hearing on 30th January, the Cabe team at the Design Council has a broad range of design expertise to contribute to this group and advise on the new design guidance.

The development of this new design guidance and its content would be best explored



collaboratively through this working group.

As a member of the new working group the Cabe team at the Design Council would also look at its own guidance to ensure it complies to the sentiments of the Taylor Review.

Indeed, the Design Council along with our partners; the Royal Institute of British Architects, the Landscape Institute and the Royal Town Planning Institute, have recently published an update to '*Design Review: Principles and Practice*' - the recognised industry standard best practice guidance in delivering independent and expert Design Review.

This represents an example of a cross-sector, industry-led effort to consolidate and focus on the core principles of good Design Review that would underpin successful delivery of the aspirations set out within the NPPF. We would welcome the Government recognising and adopting the 10 core principles as the core Government guidance for Design Review; and thus, as part of the new suite of planning guidance to emerge following the Taylor Review. This could then signpost to our industry-led document which is structured in such a way as to concisely describe the 10 core principles in more detail and how best to deliver them.

The Design Council also has experience in developing user journeys for web based resources and in piloting user efficient ways of navigating complex policy areas through on line hubs or portals. Again, we stand ready and willing to support the Government in developing the format of a revised guidance suite.

Consultation questions

1. Do you agree with the recommendations of the Review Group overall?

The Design Council agrees with the overall recommendations of the Taylor Review, subject to concern that vital guidance on the design aspects of the NPPF is included in the Government's Planning Practice Guide.

2. Do you agree with the proposed recommendations for a much reduced set of essential practice guidance in the format recommended? (Recommendations 1, 2, 3, 5, 6)

Yes, it is essential that new Government Planning Practice Guide is not only clear but kept up-to-date, coherent and easily accessible providing only essential information. We also agree that practitioner bodies and industry are best placed to produce and maintain best practice exemplar type information.

The Design Council welcomes the introduction of a single resource managed by Government to provide a coherent up-to-date guidance suite. An annual review will also be invaluable to ensure guidance is kept current.

We would caution a 'live' approach with continuous amendment to guidance and believe this will cause unnecessary confusion particularly for those using guidance as evidence. Whilst date stamping will go some way to relieve this issue we recommend that amendments to guidance occur on an annual basis as part of the proposed annual review.

3. Do you agree that standards for future Government Planning Practice Guidance should be implemented by the Chief Planner in DCLG, but with decisions on what to include within guidance still taken by Ministers? (Recommendation 4)



In line with the Taylor Review recommendation we agree that the Chief Planner is given ultimate responsibility as gatekeeper upholding the standards of the site. It is also essential that decisions taken by ministers follow published transparent guiding principles.

4. While access to all planning guidance online will be free of charge, do you think it would be appropriate to offer planning professionals an additional service involving immediate notification of every revision to the guidance, and to make a small charge for this service? (Recommendation 6)

No, to create a truly democratised system it is critical that all those who participate in the planning system have access to the same information and guidance free of charge to support them through the process.

5. Do you agree that the new web based resource should be clearly identified as the unique source of Government Planning Practice Guidance? (Recommendations 7-9)

It is important that the new web based resource is the unique source of government planning guidance. That all guidance from across Government not just CLG included (such as PINs) into the new single coherent suite to provide clarity for users and avoid duplication or contradictory advice.

In addition, it also unclear what status would be given to guidance from English Heritage which is currently used in parallel to complement CLG guidance on design. Examples include:

- Environmental Quality in Spatial Planning prepared jointly by English Heritage, Countryside Agency, Natural England and the Environment Agency.
- Conservation Principles
- Seeing history in the view
- The setting of heritage assets
- Climate change and the historic environment
- Understanding place: CA designations, appraisal and management
- Large digital screens in public places
- Temporary structures in historic places
- Refurbishing historic school buildings

The Design Council recommends that there is a second review phase where all Government Planning Practice Guidance from other departments is assessed and treated according to the same principles that will be applied as in the first phase to CLG guidance. For example, and as recommended all departmental guidance should then go to the Chief Planner at CLG as gatekeeper and upholder of these standards.

The Design Council would also support the use of awards to highlight best practice having run successful schemes on housing quality through Building for Life (now BfL 12) and the Better Public Building Awards. However these should be in addition rather than replacing key guidance.

6. Do you agree with the recommended timescales for cancellation of guidance and new/revised guidance being put in place? (Recommendations 10-13)

The Taylor Review sets out an ambitious timetable to cancel the listed material in Annex A by 28th



March and update priority guidance and prepare the new website by July. To avoid confusion and provide clarity for all those who use the planning system it is vital that the Government sets out a clear and realistic timetable that includes a defined transition period to launch the new guidance suite and web based resource.

7. Do you agree with the recommendations for cancellation of existing guidance documents? Are there specific, essential elements of current guidance material that should in your view be retained and considered for inclusion in the revised guidance set? (Recommendations 14 - 16)

The Design Council supports the cancellation of material listed in Annex A.

However, given that Annex B deals with important subject areas to be covered in future guidance in a new format it is essential that the listed guidance remain in place until replaced and incorporated into revised guidance as part of a clearly defined transition period. This includes but is not limited to key design guidance such as:

- Plan Making Manual (2009)
- Preparing Design Codes: A Practice Manual (2006)
- Planning for Town Centres: Guidance on Design and Implementation Tools (2005)
- Better Places to Live By Design: A Companion Guide to PPG3 (2001)
- By Design: Urban Design in the Planning System – towards better practice (2000)

A clear timetable needs to be set out to ensure appropriate resources can be identified by industry to support the process.

8. Do you agree with the recommended priority list for new/revised guidance? (Recommendations 17-18)

While the NPPF goes a long way to support the deliver of good quality places in policy it is essential that these ambitions are met in delivery through guidance.

In addition to the priorities set out under paragraph 18, we believe there is a need for three more priorities.

Firstly, the Design Council therefore recommends that key guidance is put in place on plan making that includes core design principles to ensure that Local and Neighbourhood Plans set out the necessary framework to deliver better quality places.

Secondly, in addition to support the delivery of objectives set out in Chapter Seven of the NPPF there needs to be Government Planning Practice Guidance on Design that consolidates the relevant parts of existing guidance and sets out the key components that deliver quality places. A useful starting point for this new guidance would be the Design Wayfinder that sets out high-level design principles which was published after the NPPF and is already used across the country in local authorities. As stated previously, new guidance should underpin the core planning principles set out in the NPPF and relate to the NPPF's chapters to provide clarity to users.

Lastly, whilst not the core concern of the Design Council, heritage matters are closely integrated in design in practice in local authority planning departments. Core Government Planning Practice



Guidance on heritage will also therefore be required.