

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 If someone has asked for their name and address not to be published, that is an important fact we would take into account.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be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published.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 type="checkbox"/>
	Government Agency / Other Public Sector	<input checked="" 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>In our view there is a need to more systematically integrate the five key objectives of good design throughout the plan making and development management decision making to help ensure the delivery of multiple benefits from a development proposal reflecting all five objectives of good design.</p> <p>The changes to the Planning system in Wales, together with the role of the PAIS and DCfW provide an opportunity to achieve this aim in the future.</p> <p>Further there is a need to ensure that the planning system is in a position to consider the need to address the long term needs of Wales, as set out in the Well Being of Future Generations Bill and to address key challenges in an integrated way namely climate change, employment creation, resource efficiency and natural resource management, biodiversity loss, energy security and efficiency and an ageing population.</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>A national development management policy on design can help ensure consistency in the integration of good design principles with the plan preparation process and development management decision making throughout Wales thereby effectively delivering the five key objectives of good design.</p> <p>Although Wales is a relatively small country its character is considerably diverse. To help ensure that policy and decision making reflect the distinctiveness of localities</p>	

when applying national development management policy on design it is important that development plans and development management decision making are based upon and informed by sound evidence. NRW's Regional Landscape Character Map, Seascapes Assessment and LANDMAP information system can help local development plans identify the character and context of their areas and explain how the design of schemes should be addressed. In the future, area based natural resource statements and green infrastructure strategies will provide opportunities to spatially express the functions and multiple benefits within places and localities.

For designated landscapes the respective Management Plans prepared by AONB's and National Park Authorities similarly provide an evidence base for decision making.

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
	Although not an example of a master plan, an example of SPG good practice, where biodiversity and development have been accommodated, is in the Carmarthenshire - Caeau Mynydd Mawr SAC SPG.

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

We agree that Welsh Government should produce practice guidance on the process of site analysis to respond to site context and inform well designed proposals. As well as targeting the training at the development industry and local planning authorities, the training should also be targeted at statutory consultees.

This could inform Local Development Plans, Supplementary Planning Guidance, and pre-application discussions on development proposals.

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?

The preparation and development of the principles of good design to inform pre application discussions would help integrate design quality at the outset of project development rather than being raised at a later stage of the development process.

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?

No comment.

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

The 1APP form is usually completed after a scheme has been designed and when an application is being submitted for planning permission. As such we feel that

amendments to the form would not ensure inclusive access issues are considered in development proposals.

Q8

Access

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

No comment.

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?

National development management practice guidance on design together with a consistent evidence base on character and distinctiveness will provide context for mainstreaming good design in the planning process. The PAIS and DCfW, working with other national stakeholders, sectors and statutory consultees can help facilitate training and decision support tools.

The role of design review panels on a regional basis could be considered as a mechanism to provide and develop capacity at a sub national level.

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?

See response to Q9 above.

It is important that all those involved in the development process have the necessary design skills, which specifically include understanding and appreciation of local context and character.

It will be important for the design and decision making process to understand and respond to future challenges in relation to climate change, resource efficiency and natural resource management, biodiversity loss, energy security and efficiency and the well being of future generations. This will entail different ways of working, an emphasis on intervention and the achievement of multiple objectives and outcomes necessitating different and new skill sets.

Q11	Design Skills and Good Practice	X
	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
	No	

Q11	Further Comments
See response to Q9.	
<p>Design review panels on a regional basis can help maintain capacity whilst also ensuring a consistent approach to design guidance and master-planning. The joint work between Plymouth and South Hampshire in relation to the Sherford Design Guide is an example of the benefits of this approach.</p> <p>The Sustainable Design Guide prepared by the three National Park Authorities in Wales is an example of collaborative working on a National basis and the 'Working with a Changing Climate - A Guide to adaptation in the Clwydian Range and Dee Valley AONB' is an example of a local initiative which seeks to provide a longer term perspective to the consequences of decision making.</p>	

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?	
See response to Q11.		

Q13	Design and Access Statements	X
	Are there any benefits in retaining the requirement for Design and Access Statements for particular applications?	

Yes	
Neither Yes nor No	X
No	

Q13 Further Comments

Although DAS can be onerous for minor applications, in sensitive areas such as designated landscapes, DAS can be a useful tool for demonstrating the evolutionary process of a development, and why a final design has been selected. If used properly this should lead to consideration of design earlier in the development process, with improved outcomes for the environment.

As well as being a useful aid for decision makers, DAS can also be useful communication tool for consultees and members of the public.

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

See response to Q13.

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</p> <p>[Please include 'Design in the Planning Process Consultation' in the subject line]</p>	<p>Please complete the consultation form and send it to:</p> <p>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