

Number: **WG23161**



Llywodraeth Cymru
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Consultation Responses – Part 2

Design in the Planning Process

Date of issue: **June 2015**

CONSULTATION RESPONSE FORM

Design in the Planning Process (Consultation)

Date: 6 October 2014 - 16 January 2015

Name	[REDACTED]	
Organisation	Heddlu Gwent Police	
Address	[REDACTED]	
E-mail address	[REDACTED]	
Telephone	[REDACTED]	
Type (please select one from the following)	Business	<input type="checkbox"/>
	Local Planning Authority	<input type="checkbox"/>
	Government Agency / Other Public Sector	X <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	X
	Neither Yes nor No	
	No	

Q1 Further Comments

The police service currently has a good working relationship with the local planning authorities in respect of advising on community safety issues and the implementation of ‘designing out crime’ in the planning process.

The Welsh Assembly review of Design and Access statements has shown they assist in developing safer communities however if the Design and Access statements are removed from the planning process then how will the community safety aspect that it addresses be delivered?

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

Q2 Further Comments

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	X

Neither Yes nor No	
No	

Q3	Further Comments

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

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 can definitely assist in the improvement of design quality if the right persons/bodies are involved. In Wales an area of good practice is the process for social housing which has to meet the Welsh Government's Development Quality Requirements Standards. Police Designing out Crime Officers are involved from the pre-application stage right through to the completion of the development. It would be beneficial for Wales if this process could be replicated for major private developments.

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?		

Q7	Access	x
Do you agree that the amendments to the 1APP form will ensure inclusive access issues are considered in development proposals?		
Yes		
Neither Yes nor No		x
No		

Q7	Further Comments

Q8	Access	
What information or other measure would assist local planning authorities assess planning proposals in terms of inclusive access?		

No view.

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?

By providing detailed appropriate guidance including addressing community safety issues.

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?

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

x

Neither Yes nor No	
No	

Q11	Further Comments
<p>Standardisation of the pre application stage consultees would be beneficial. After visiting all local authorities in the Gwent Police area Designing out Crime officers are consulted on developments at the pre application stage enabling good design features to be implemented from the outset reducing the opportunity for crime to be committed. However, I am aware that this is not necessarily standard practice varying in different force areas.</p>	

Q12	Design Skills and Good Practice	
<p>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?</p>		

Q13	Design and Access Statements	x
<p>Are there any benefits in retaining the requirement for Design and Access Statements for particular applications?</p>		
Yes		x
Neither Yes nor No		
No		

Q13	Further Comments
<p>Design and Access statements currently address the issue of community safety. If they are removed then how will community safety be addressed?</p>	

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Q14	Design and Access Statements	
	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
	<p>As outlined at Question 13 Design and Access statements currently address the issue of community safety. Design and Access statements should only be removed if Community Safety and Crime Prevention issues are adequately addressed elsewhere in the planning process.</p>

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

CONSULTATION RESPONSE FORM

Design in the Planning Process (Consultation)

Date: 6 October 2014 - 16 January 2015

Name	[REDACTED]	
Organisation	Heddlu Gwent Police	
Address	[REDACTED]	
E-mail address	[REDACTED]	
Telephone	[REDACTED]	
Type <i>(please select one from the following)</i>	Business	<input type="checkbox"/>
	Local Planning Authority	<input type="checkbox"/>
	Government Agency / Other Public Sector	X <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	X
	Neither Yes nor No	
	No	

Q1 Further Comments

Gwent police has a good working relationship with the local planning authorities in respect of advising on community safety issues and the implementation of ‘designing out crime’ in the planning process.

The Welsh Assembly review of Design and Access statements has shown they assist in developing safer communities however if the Design and Access statements are removed from the planning process then how will the community safety aspect that it addresses be delivered?

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

Q2 Further Comments

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	X

Neither Yes nor No	
No	

Q3	Further Comments

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

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 assist in the improvement of design quality if the right persons/bodies are involved. In Wales an area of good practice is the requirement for social housing which has to meet the Welsh Government's DQR Standards. Police Designing out Crime Officers are involved from the pre-application stage right through to the completion of the development. It would be beneficial for Wales if this requirement was replicated for all major private developments.

Q6	Planning Applications	
<p>Other than further training or additional practice guidance what additional tools would assist you in assessing the quality of design in planning proposals?</p> <p>For the relevant Police Staff/ Officers being consultees at the pre application for all major developments.</p>		

Q7	Access	
<p>Do you agree that the amendments to the 1APP form will ensure inclusive access issues are considered in development proposals?</p>		
Yes		
Neither Yes nor No		x
No		

Q7	Further Comments

Q8	Access
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What information or other measure would assist local planning authorities assess planning proposals in terms of inclusive access?

No view.

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?

By providing appropriate guidance including addressing community safety issues.

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?

Continuing to raise awareness of community safety within design.

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	X
Neither Yes nor No	
No	

Q11 Further Comments

Standardisation of the pre application stage consultees would be beneficial. After visiting all local authorities in the Gwent Police area Designing out Crime officers are consulted on developments at the pre application stage enabling good design features to be implemented from the outset reducing the opportunity for crime to be committed. However, I am aware that this is not necessarily standard practice varying in different force areas.

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?

Q13 Design and Access Statements

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

Yes	X
Neither Yes nor No	
No	

Q13 Further Comments

Design and Access statements currently address the issue of community safety.

Q14	Design and Access Statements	
	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
	<p>As outlined at Question 13 Design and Access statements currently address the issue of community safety. Design and Access statements should only be removed if Community Safety and Crime Prevention issues are adequately addressed elsewhere in the planning process.</p>

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

CONSULTATION RESPONSE FORM

Design in the Planning Process (Consultation)

Date: 6 October 2014 - 16 January 2015

Name	Richard Lewis	
Organisation	Torfaen County Borough Council	
Address	Torfaen County Borough Council Planning & Public Protection Tŷ Blaen Torfaen, Panteg Way New Inn Pontypool NP4 0LS	
E-mail address	Richard.lewis@torfaen.gov.uk	
Telephone	01633 647628	
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>DAS has become simply a ✓ box exercise often prepared after plans have been drawn rather than to inform a proposal. One of the most effective ways of ensuring good design is to deal with it right at the start of the process (frontloading) before detailed proposals have been drawn up. There needs to be clear guidance to ensure that where LPA's refuse on design grounds this is supported at appeal in terms of assessing harm.</p> <p>Applications are often submitted by unqualified people with no design experience. Sometimes difficult to reconcile good design with secured by design principles. Sustainability policies lack teeth and are too broad in interpretation. More concise and meaningful guidance would be useful specifically in a development management context. Despite this, officers work hard to improve design despite the planning system.</p>	

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

Q2	Further Comments
<p>But see above comments in terms of targeted guidance.</p>	

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>Only where required in LDP's but often prepared or submitted at the same time as a planning application rather than in advance to inform the development proposal.</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
<p></p>	

05

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?

Better and clearer guidelines that are supported at appeal. Has any analysis been done on appeal decisions relating to design issues?

06

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?

**Review of appeal decisions relating to design issues.
Requirement for trained or qualified urban designers within planning Depts
More use of Design Commission for Wales ie. peer review of proposals. Possibly make it a requirement at pre application stage as part of the consultation process if resources allowed.**

07

Access

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

Yes

Neither Yes nor No	X
No	

Q7	Further Comments
<p>Unclear on whether Access statements are to be phased out along with DAS. If not, it is unclear how a question on the application form will do more than the requirement for an access statement.</p> <p>More guidance on inclusive access and the link with Building Regs would be helpful particularly on what is reasonable to include in proposals and what is not.</p>	

Q8	Access
<p>What information or other measure would assist local planning authorities assess planning proposals in terms of inclusive access?</p>	
<p>As above + examples of best practice</p> <p>Requirement to consult and better resourcing of local access groups to enable them to become more involved in the application and pre application process.</p>	

Q9	Design Commission for Wales and Planning Advisory and Improvement Service
<p>How can the PAIS and DCfW mainstream good design and inclusive access in the planning process?</p>	
<p>Involvement up front at the pre application stage as part of the requirement to consult.</p>	

Q10	Design Skills and Good Practice
<p>How can we continue to raise the design skills of local authority officers and members and what further specific training is required?</p>	

See above.
Seminars by Design Commission.

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		
No		

Q11	Further Comments
Sharing examples of best practice Review of appeal designs. Access to advice from urban designers	

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?		

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Q13	Design and Access Statements	#
	Are there any benefits in retaining the requirement for Design and Access Statements for particular applications?	
	Yes	
	Neither Yes nor No	
	No	X

Q13	Further Comments
	See response to question 1.
	It is however helpful to get developers thinking about design and access issues at the earliest opportunity. Again pre application engagement would be key.

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

Q14	Further Comments

See response to questions 1 and 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.

More guidance required on what is essentially a subjective matter.

Design costs and this makes negotiation difficult.

Appeal decisions need to demonstrate support for good design by resisting proposals for bad design provided there is some consensus on what is good and bad design.

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





Design in the Planning Process

Consultation Response

January 2015

About Us

The National Deaf Children’s Society (NDCS) Cymru is the national charity dedicated to creating a world without barriers for deaf children and young people.

We support and represent the interests of deaf children and young people from birth through to independence. In referring to “deaf” we refer to all levels of hearing loss, including mild, moderate, severe, profound and temporary hearing loss.

Background

NDCS Cymru welcomes the opportunity to respond to this consultation. Indeed, we have concerns that the planning process is not effective in ensuring that school, college and nursery buildings are accessible to deaf learners.

Following the devolution of building regulations, we launched our *Sounds Good* campaign at the end of 2011. The campaign called for more robust acoustic regulations for school, college and nursery buildings in Wales.

Poor acoustics in school buildings present access issues for all pupils, but particularly for children with additional learning needs, including autism, speech and language difficulties, visual impairment and deafness. Indeed, many deaf children and young people have an oral approach to learning and require a good listening environment in order to utilise their access to sound. While many deaf pupils use assistive listening equipment, such as hearing aids or radio aids, these devices do not restore typical hearing levels and a good acoustic environment is required for these devices to be effective. Welsh Government statistics demonstrate that deaf pupils in Wales are underachieving at every Key Stage and, as deaf young people have themselves identified,¹ poor acoustics is a key barrier preventing them from reaching their full potential.

Although school buildings are required to meet a minimum acoustic standard, our campaign report highlighted a lack of confidence that this is being achieved. It

¹ NDCS Cymru worked with deaf children and young people to create a video talking about the key barriers they face at school. The young people identified poor acoustics as one key barrier. For more information and to watch the video, please visit http://www.ndcs.org.uk/about_us/campaign_with_us/wales/close_the_gap/index.html.

highlighted that most school building projects in Wales were neither tested for compliance with these standards nor involved any consultation with an acoustic specialist. The report identified the following concerns:

- That it is relatively easy to opt out of meeting acoustic standards and, in practice, acoustic standards can be dropped without thorough consideration.
- That the importance of meeting acoustic standards in school buildings was being undermined as there was no compulsory requirement to test for compliance with acoustic standards.
- That legal standards on acoustics do not apply to all nursery and further education buildings.

NDCS Cymru is pleased that the Welsh Government has acknowledged the importance of improving compliance with acoustic standards through making specific contractual demands of projects funded through its 21st Century Schools Programme. However, NDCS Cymru considers that the Welsh Government could utilise this opportunity to take this commitment further; NDCS Cymru wishes to ensure that all school, college and nursery buildings sound good, regardless of how they are funded.

For more information on our Sounds Good campaign, please visit

http://www.ndcs.org.uk/about_us/campaign_with_us/wales/sounds_good/index.html

The need to improve acoustics in school buildings was also identified by deaf children and young people themselves through our Close the Gap petition presented to the National Assembly for Wales' Petitions Committee in May 2013. The Petitions Committee is presently taking evidence on acoustics in school and will write a report on the issue in due course. For more information on this petition and to see what the young people said on their petition video, please visit:

http://www.ndcs.org.uk/about_us/campaign_with_us/wales/close_the_gap/index.html

Response

1. Is the planning system effectively delivering the five key objectives of Good design?

NDCS Cymru is concerned that the key objective “ensuring ease of access for all” is often not achieved for the deaf population through the current planning process. The current position is that good design for the hearing impaired is not common, therefore separate access provision is required as the norm.

As outlined above, we have identified particular issues in relation to meeting acoustic standards in school buildings through our *Sounds Good* campaign and would urge

the Welsh Government to improve building regulations to this end. In particular, we would suggest that:

- Compulsory pre-completion testing for compliance with acoustic standards is required and that buildings which fail receive remedial action to bring them up to standard.
- That the acoustic standards are extended to cover all nursery and further education buildings as well as schools.
- At present, it is relatively easy to opt out of meeting acoustic standards and, in practice standards can be dropped without thorough consideration. We would like the regulations to be tightened to prevent this from happening.

2. Do you agree that a national development management policy on design would be beneficial?

We are of the view that a national development management policy on design would be beneficial only if it could adequately provide provision for equal access to deaf children and people with a hearing impairment.

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

The National Deaf Children's Society has recently produced a series of resources that set out the simple steps that can be taken to improve the listening environment in schools, nurseries and other education settings.² Improving listening environments will benefit not only deaf children but other children with additional learning needs. Teachers and support staff will also benefit from an improved listening environment. The resources are tailored for different audiences, including property managers, commissioners, local authorities and other professionals.

NDCS has also developed three quality marks as part of a self-accreditation scheme to help schools demonstrate that their classrooms provide a good listening environment for pupils. The Quality Marks can only be used if an acoustic test has been carried out by a competent person such as a member of the Institute of Acoustics (IOA) (www.ioa.org.uk) or whose company is a member of the Association of Noise Consultants (www.association-of-noise-consultants.co.uk)

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

² The free resources are available here: www.ndcs.org.uk/acoustics

No, we do not agree. In our experience deaf children and hearing impaired people are NOT properly considered as part of the inclusive design process. They routinely have to struggle with unsuitable spaces and therefore need some additional assistance from DAS. If the DAS are removed there would, in all probability, be no provision for the hearing impaired, leading to less inclusion.

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

An inclusive design assessment would be of assistance to test whether proper consideration has been given to the needs of deaf children and the hearing impaired. If it has not, then an access statement should continue to be required. This is the opposite of what is being proposed.

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

PAIS and DCfW should make sure that good acoustic design standards are considered and delivered as part of Inclusive Access Designs, and that suitable specialists have tested to check that the design has been implemented.

Architect Julian Treasure presented a TED talk in 2012 on why architects and designers need to “use their ears” and pay attention to the invisible architecture of sound. We would recommend that PAIS and DCfW use this talk in any training or resources relating to good design and inclusive access. The talk is available here: <https://www.youtube.com/watch?v=y5nbWUOc9tY>

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

In 2011, NDCS Cymru issued Freedom of Information Requests to all 22 local authorities to establish how acoustic standards were being applied on the ground. As identified in our *Sounds Good*³ campaign report, the feedback we received suggested that officers were confused about the status of minimum acoustic standards.

NDCS Cymru recommends that local authority officers and members receive training in acoustic standards. It would also be beneficial to include information on why good acoustics are so important for vulnerable groups of learners, particularly deaf pupils. Our sound simulation demonstrates what it is like to be a deaf pupil in a classroom with poor acoustics. To listen to this simulation, please visit http://www.ndcs.org.uk/family_support/audiology/hearing_loss_simulation/index.html.

We would also recommend the TED Talk by Julian Treasure mentioned above in question 9 as an essential element of training in acoustic standards.

³ *Sounds Good* Campaign report (2011), available at http://www.ndcs.org.uk/about_us/campaign_with_us/wales/sounds_good/index.html

As mentioned previously, NDCS has recently published a new resource pack for schools, local authorities and parents on how to achieve good listening conditions in learning environments. We would welcome the opportunity to work with the Welsh Government and local authorities to ensure that this pack is utilised throughout Wales.

12. 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?

NDCS Cymru contributed to a case study on Rogiet Primary School, Monmouthshire, which was built as part of the 21st Century Schools programme. NDCS Cymru was asked for advice on the importance of ensuring a good acoustic environment in the school.

The school site is located near the M4, M48, and a railway, but good acoustic design has ensured that these outside noises are not able to distract pupils inside the school building. Careful consideration has also been given to the interior of the school, so that noise from corridors and neighbouring classrooms does not carry through to other areas of the school. As a result, pupils are not distracted by background noise and teachers do not have to strain their voices to be heard. While the good acoustics are beneficial to everyone within the school, the quiet environment has also made the school more inclusive of pupils with a hearing loss.

In order to achieve a good acoustic environment, acousticians were consulted from the design phase of the project and, following completion of the project, acoustic testing ensured compliance with the acoustic standards outlined within Building Bulletin 93.

The acoustic standard at Rogiet Primary was achieved as a result of carefully considering the acoustics from the design phase throughout the project. At the start of the project, a noise survey was conducted onsite and consideration was given to the positioning of the school building in order to minimise the impact of noise from the nearby train line and roads.

Acousticians worked closely with the architects throughout the project and a number of measures were taken to secure a good acoustic environment. For example, careful consideration of cross ventilation and a BMS system controlling window openings was used to meet the ventilation requirements of BB101 without the need for wide window openings, helping to ensure that children within the school building are not disrupted by outside noise.

Acoustically rated, solid core doors were also utilised with acoustic seals on all four sides, in order to help ensure that noise does not travel between rooms.

Following completion of the project, acoustic testing ensured compliance with the acoustic standards outlined within Building Bulletin 93.

More details of the project can be found on the 21st Century Schools website where Rogiet Primary School is used as an exemplar of inclusive access in achieving good acoustic standards. ⁴

14. Should the mandatory requirement for Design and Access Statements be removed from secondary legislation? Give reasons for your answer.

No. If DAS were removed from secondary legislation there would be no way to check whether any provision has been made for deaf children and hearing impaired people. This could be open to legal challenge and could be deemed to be unlawful under the Equalities Act 2010.

15. 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.

Acoustics is of critical importance to inclusive design and for access by those with hearing impairment. Much more could be done to require good standards of internal acoustics from the planning stages in all types of buildings. There is not one raft of guidance, as there now is for school acoustics, but it would be beneficial to create such guidance. Assistance can be provided by the Institute of Acoustics in preparing a guide to inclusive acoustic design for Wales.

For More Information

For more information on the points raised in this consultation, please contact Wales.Campaigns@ndcs.org.uk.

Many thanks.

⁴ <http://21stcenturyschools.org/projects/south-wales/rogietprimaryschool/?lang=en>

Design in the Planning Process (Consultation)

Date: 6 October 2014 - 16 January 2015

Name	Debbie Thomas & Elin Wyn	
Organisation	National Deaf Children's Society Cymru	
Address	2 Ty Nant Court, Morganstown, Cardiff CF15 8LW	
E-mail address	Wales.campaigns@ndcs.org.uk	
Telephone	02920 373474	
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)	<input checked="" type="checkbox"/>
	Other (other groups not listed above)	<input type="checkbox"/>

CONSULTATION RESPONSE FORM

Design in the Planning Process (Consultation)

Date: 6 October 2014 - 16 January 2015

Name	Stefan Preuss	
Organisation	National Grid	
Address	National Grid House, Warwick Technology Park, Gallows Hill, Warwick, CV34 6DA	
E-mail address	stefan.preuss@nationalgrid.com	
Telephone		
Type <i>(please select one from the following)</i>	Business	<input checked="" 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)	<input type="checkbox"/>
	Other (other groups not listed above)	<input type="checkbox"/>

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

Q1	Further Comments
	No comment.

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

Q2	Further Comments
	A national development management policy on design would be beneficial as it would encourage greater consistency in the overall approach to design across Wales. Whilst there are local distinctives which good design should address, a cohesive approach to consideration of design would help both developers and local authorities to avoid delays to the determination of applications whilst further design work is carried out.

Q3	Supplementary Planning Guidance	
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		
No		

Q3	Further Comments
No comment.	

Q4	Supplementary Planning Guidance	
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
Practice guidance on site analysis would be beneficial and in combination with a national development management policy on design would be likely to improve the consistency of decision making in Wales in relation to design.	

Q5	Front Loading / Pre-applications	
<p>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?</p>		
<p>Early identification of design principles and any more sensitive local issues by local authorities in pre-application discussions should be encouraged.</p>		

Q6	Planning Applications	
<p>Other than further training or additional practice guidance what additional tools would assist you in assessing the quality of design in planning proposals?</p>		
<p>As explained above, a national development management policy on design in combination with practice guidance and training to local planning officers and members would be beneficial.</p>		

Q7	Access	
<p>Do you agree that the amendments to the 1APP form will ensure inclusive access issues are considered in development proposals?</p>		
Yes		
Neither Yes nor No		
No		

Q8	Further Comments
<p>No comment.</p>	

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Q9	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?		
No comment.		

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?		
No comment.		

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	X
	Neither Yes nor No	
	No	

Q11	Further Comments
	A national development management policy on design in combination with practice guidance can help to promote consistency among local planning authorities.

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?	
	No comment.	

Q13	Design and Access Statements	
	Are there any benefits in retaining the requirement for Design and Access Statements for particular applications?	
	Yes	X
	Neither Yes nor No	

	No

Q13	Further Comments
<p>National Grid agrees that the requirement to prepare a Design and Access Statement is not appropriate for every type of application and that there are shortfalls in terms of what applicants are expected to include in such Statements. For example, applicants are regularly required to cover access issues as a matter of course for types of development that will not actually be open to the general public (e.g. buildings hosting energy infrastructure). Such requirements seem inappropriate and a waste of resources.</p> <p>National Grid agrees that for smaller applications there is a risk of the Design and Access Statement being viewed as a 'box ticking' exercise which does not add any real value or quality to the proposals.</p> <p>At the same time, there is a risk that, if Design and Access Statements were no longer required for certain types of development, local planning authorities may refuse to validate a planning application.</p> <p>For Development of National Significance (DNS) and major development, there is benefit in a clear understanding of how the design and access principles should be documented. Consistency is important for major schemes which may cross local authority boundaries – a requirement for a Design and Access Statement is one way to achieve this.</p> <p>If there is no requirement for a Design and Access Statement, there is a risk of applications being drawn into disputes over whether design information is adequate to meet local requirements for validation of an application. In order to give confidence in the planning system in Wales, any changes must ensure that what is required for an application to be validated should be clearly set out in guidance, if not in regulation.</p> <p>National Grid therefore considers that retaining Design and Access Statements for DNS and major development is one way of providing clarity and consistency. However, there needs to be a clear recognition that the contents and level of detail of such Statements need to be proportionate and take account of the type and nature of an application. This should be made clear in the proposed national development management policy on design.</p>	

Q14	Design and Access Statements
<p>Should the mandatory requirement for Design and Access Statements be removed from secondary legislation? Give reasons for your answer.</p>	
	Yes

Neither Yes nor No	
No	

Q14	Further Comments
<p>As explained in our response to Question 13, National Grid agrees that not all schemes should be required to prepare Design and Access Statements. National Grid agrees that for smaller applications there is a risk of the Design and Access Statement being viewed as a ‘box ticking’ exercise which does not add any real value or quality to the proposals.</p> <p>If Design and Access Statements are to be retained they should be retained for DNS and major development only. Whilst appreciating that there is a danger that any boundary set will appear arbitrary, National Grid would suggest that the boundary for requiring a Design and Access Statement should be set consistently with the front-loading obligations, so as to apply only to major developments and developments of national significance.</p> <p>There needs to be a clear recognition that the contents and level of detail of such Statements need to be proportionate and take account of the type and nature of an application. This should be made clear in the proposed national development management policy on design.</p>	

Q15	Any Other Comments
<p>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.</p>	
<p>No additional comments.</p>	

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>

CONSULTATION RESPONSE FORM

Design in the Planning Process (Consultation)

Date: 6 October 2014 - 16 January 2015

Name	Shan Bowden	
Organisation	Penarth Town Council	
Address	West House, Stanwell Road, Penarth, Cf64 2YG	
E-mail address	sbowden@penarthtowncouncil.gov.uk	
Telephone	029 20713844	
Type <i>(please select one from the following)</i>	Business	<input type="checkbox"/>
	Local Planning Authority	<input type="checkbox"/>
	Government Agency / Other Public Sector	X <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	
	No	

Q1	Further Comments
	<p>It is apparent that whilst there are some well designed schemes they usually correlate with high profile publicly sponsored projects, high land values or well resourced clients. The everyday volume house builder schemes or individual householder applications are often of poor quality. In the case of house builders the practice of reproducing existing house types has not reduced greatly since design guides/ briefs have become the norm, certainly not in proportion to the amount of guidance available.</p> <p>Better outcomes do not relate to guidance alone but require structural change in the wider development industry and greater interest on the part of the public and elected representatives including Town and Community Councils.</p> <p>The lip service often displayed to mentioning all five of the design objectives in Design and Access Statements should possibly be reconsidered with greater discretion to develop particular points.</p>

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

Q2	Further Comments
	To provide clarity and consistency to Local Authorities and the public.

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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	
	No	

Q3	Further Comments
	Where community and town councils have developed place plans as SPG these should be used to help inform planning decisions though should not necessarily be binding on the final decision

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

The Guidance produced should however be addressed to both the practitioner, the general public and elected representatives at Principal Council and the Community and Town Council sector. Given the relative lack of impact across the vast majority of the built environment the existing mainly professionally oriented guidance ,should be expanded to include considerations which the public and elected members should take account of in assessing schemes. This is particularly relevant to the Community and Town Council Sector –who may be involved in producing Supplementary Planning Guidance in other proposals associated with the Planning Bill

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?

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?

Guidance should be alive to the emerging opportunities through social media and interactive design to shift the emphasis, in appropriate situations e.g major applications or SPG, to a more inclusive process. This is a dynamic situation and any replacement DAS package should be similarly dynamic.

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	

Q7	Further Comments	

Q8	Access	
What information or other measure would assist local planning authorities assess planning proposals in terms of inclusive access?		

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?		
<p>Both organisations, in their on-going remit, should incorporate the localist and front loading philosophy tentatively embraced in other proposals for the LDP Process, Place Plans and SPG formulation by the Community Council Sector and the front loading Consultation on major applications. Design becomes a less done to and for exercise and more an inclusive process. This will require resources both in the delivery of mainstream training and other support for individual Councils in the Community Sector and other community groups. The former can be assisted as mooted by PAW and One Voice Wales (OVW) training modules.</p> <p>OVW can be particularly useful as it can ensure training is relevant in the context of other changes presently emerging to increase the size of Local Authorities and “austerity” measures potentially aimed at the devolution of physical/ environmental services to the community sectors.</p>		

As the front loading agenda becomes established and legitimate there will be opportunities for planning professionals to work with the Community Council sector who can budget for this, overcoming in part the lack of resource at the LPA 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 answers to other questions

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

Whilst Principal Authorities can work horizontally to share best practice they can also work vertically with Town and Community Council's and community groups to shift the design paradigm, to one in which it is less a delivery of expertise to and for to one in which there is more inclusion, as noted under Q9. Some Councils are beginning to address this in emerging community and place plans.

This will require underpinning by training as noted in answer to other questions.

Structurally the front loading proposals in relation to major applications and the LDP/SPG process should aid the change in mind-set; and also underline the understanding that design is far more than visual appearance and vehicular access.

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?		

Q13	Design and Access Statements	X
Are there any benefits in retaining the requirement for Design and Access Statements for particular applications?		
Yes		X
Neither Yes nor No		
No		

Q13	Further Comments
Emphatically yes.	
<p>OVW has said in oral evidence to the Bill Committee that they have a powerful role in communicating proposals to the Community Council Sector, who spend a good deal of time dealing with the grass roots reactions to applications besides the time spent extracting relevant information from the application forms and plans.</p> <p>In the context of a trained and resourced Council a DAS can highlight legitimate areas for attention and frame the observations to the LPA.</p> <p>Thus ensuring the costly exercise of considering applications is efficient, directed, adds value and gives more weight to observations by the Community Council Sector.</p> <p>Seen as a communication tool they could be more selective in the information required, less going through the motions but providing the opportunity to explain constraints, opportunities and the response in terms of design and layout or other material matters They should clearly be part of major applications and applications in</p>	

designated conservation areas and environmentally sensitive situations. But leaving the opportunity for the applicant to provide them for other applications.

Q14	Design and Access Statements	*
	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	

Q14	Further Comments

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

Design Consultation
Planning Policy Branch
Planning Division
Welsh Government
Cathays Park
Cardiff CF10 3NQ

15 January 2015

Dear Sir / Madam,

Consultation on Design in the Planning Process

Thank you for the opportunity to comment on this consultation paper.

The Chartered Institute for Archaeologists

The Chartered Institute for Archaeologists (CIfA) is a professional body for the study and care of the historic environment. It promotes best practice in archaeology and provides a self-regulatory quality assurance framework for the sector and those it serves. The Institute was granted a Royal Charter of Incorporation on 03 June 2014

CIfA has over 3,150 members and more than 70 registered practices across the United Kingdom. Its members work in all branches of the discipline: heritage management, planning advice, excavation, finds and environmental study, buildings recording, underwater and aerial archaeology, museums, conservation, survey, research and development, teaching and liaison with the community, industry and the commercial and financial sectors.

CIfA's Wales / Cymru Group has over 300 members practising in the public, private and voluntary sector in Wales.

Design in the Planning Process

General

CIfA welcomes Welsh Government's commitment to achieving the delivery of good design in the built and natural environment.

In this regard CIfA is concerned to see that the historic environment and the likely impact of development upon it are fully taken into account in assessing development proposals, whether through Design and Access Statements, other mechanisms or a combination of both.

The Institute is aware of the related work undertaken by Welsh Government in relation to the historic environment (touched on under the heading 'heritage' in paragraph 24 of the consultation paper). If the Heritage Bill introduces a requirement for heritage impact assessments (however termed) consideration will need to be given to how this relates to Design and Access Statements insofar as the latter are retained as part of the planning system.

At present desk-based assessments in relation to the historic environment and archaeological field evaluations are covered by professional standards (see <http://www.archaeologists.net/codes/ifa>). CIfA would wish to see any future requirements for archaeological assessment of impact upon the historic environment (whether through heritage impact assessments, Design and Access Statements or otherwise) subject to a requirement that relevant assessments should be carried out in accordance with CIfA Standards and guidance.

Specific Questions

Q1 Is the planning system effectively delivering the five key objectives of good design? Give reasons for your answer.

1.1 No comment, save that 'environmental sustainability' should not focus predominantly on natural resources but should fully embrace the historic environment.

Q2 Do you agree that a national development management policy on design would be beneficial?

2.1 Yes.

Q3 Are area and site specific plans, such as masterplans, being used to positively plan for key development? Can you highlight areas of good practice?

3.1 No comment.

Q4 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?

4.1 Yes. This should fully embrace analysis of the historic environment.

Q5 How can we ensure that pre-application discussions assist in the improvement of design quality and inclusive access of development?

5.1 In relation to the historic environment, by encouraging the early production of historic environment desk-based assessments in accordance with professional standards (<http://www.archaeologists.net/sites/default/files/node-files/DBA2012-New Format.pdf>) along with any other evaluations or assessments as appropriate.

Can you highlight areas of good practice?

5.2 No comment.

Q6 Other than further training or additional practice guidance what additional tools would assist you in assessing the quality of design in planning proposals?

6.1 In relation to the historic environment, the consistent application of professional standards in the design of development.

Q7 Do you agree that the amendments to the 1APP form will ensure inclusive access issues are considered in development proposals?

7.1 No comment.

Q8 What information or other measure would assist local planning authorities assess planning proposals in terms of inclusive access?

8.1 No comment.

Q9 How can the PAIS and DCfW mainstream good design and inclusive access in the planning process?

9.1 In relation to the historic environment, the starting point should be to ensure that the PAIS contains, or has access to, appropriate historic environment expertise.

Q10 How can we continue to raise the design skills of local authority officers and members and what further specific training is required?

10.1 Basic training in relation to the historic environment for officers without historic environment expertise and members would be helpful.

Q11 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?

11.1 No comment.

Q12 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?

12.1 No comment.

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

13.1 There needs to be some mechanism, or mechanisms, to ensure that the historic environment and the likely impact of development on it are appropriately considered in dealing with any application. If Design and Access Statements contribute to this end in relation to any particular applications, then they should only cease to be required if there are other mechanisms in place to ensure that the historic environment is fully considered.

Q14 Should the mandatory requirement for Design and Access Statements be removed from secondary legislation? Give reasons for your answer.

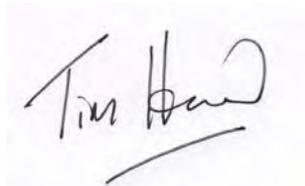
14.1 See paragraph 13.1 above.

Q15 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.

15.1 No comment.

If there is anything further that I can do to assist please do not hesitate to contact me.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Tim Howard', with a horizontal line underneath.

Tim Howard LLB, Dip Prof Arch
Senior Policy Advisor

CONSULTATION RESPONSE FORM

Design in the Planning Process (Consultation)

Date: 6 October 2014 - 16 January 2015

Name		
Organisation	Sainsburys Supermarkets Ltd	
Address	c/o Peter Waldren, WYG, 5 th Floor, Longcross Court, 47 Newport Road, Cardiff, CF24 0AD	
E-mail address	WYG: peter.waldren@wyg.com	
Telephone	WYG: 02920 320 722	
Type <i>(please select one from the following)</i>	Business	<input checked="" 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)	<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
Sainsburys Supermarkets Ltd (SSL) consider the planning system is just one facilitator in delivering the objectives of design. The planning system relies heavily on other regimes such as Building Regulations in respect of aspects of Environmentally Sustainability and Access. The planning system is not best placed to deliver on each of the objectives of good design.

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

Q2 Further Comments
SSL consider imposing a national development management policy on design will enable a greater level of certainty and a co-ordinated approach in terms of design quality across Wales.

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	
	N/A	

Q4	Supplementary Planning Guidance	<input checked="" type="checkbox"/>
	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	<input checked="" type="checkbox"/>
	Neither Yes nor No	
	No	

Q4	Further Comments	
	Clear national guidance will reduce uncertainty for developers and LPAs alike. A reasonable, realistic and pragmatic approach should be taken when considering the design of developments such as supermarkets which often seek to adopt a consistent approach in terms of branding and overall high quality modern appearance. This legitimate commercial consideration should be recognised in any national guidance.	

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?	
	SSL consider the design considerations should be discussed at pre-application stage with relevant design officers to agree the approach/details and thus limit the number of changes required post-submission.	

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	X
	No	

Q7	Further Comments	
	SSL support the consideration of inclusive access from the offset on the 1APP form. It is considered likely, however, that LPAs will be reluctant to accept that inclusive access does not form a key issue in most applications and accordingly they will be likely to request additional information/design changes to achieve inclusive access as a matter of course. Inclusive access is therefore likely to continue to remain a 'bolt-on' issue as part of the design and access statement (if still a requirement) or other documentation.	

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?	
	No comment.	

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?	
	No comment.	

--

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
	No comment.

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?	
	No comment.	

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	
	No	X

Q13	Further Comments
	See below (Question 14).

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	x
Neither Yes nor No	
No	

Q14 Further Comments

SSL suggest that the requirement for a Design and Access Statement is often unnecessary and hinders validation when debate arises on whether a statement is satisfactory or not. The time/cost to prepare such statements is significant and often provides little added value, particularly for smaller scale or utilitarian development (such as that which has limited interface with the public realm, such as the stationing of a Timpson's 'pod' in the enclosed car park of a supermarket). Accordingly, the mandatory requirement for Design and Access Statements in secondary legislation should be removed.

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 comment.

How to respond

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

E-mail	Post
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]	Please complete the consultation form and send it to: Design Consultation Planning Policy Branch Planning Division Welsh Government Cathays Park Cardiff CF10 3NQ

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

CONSULTATION RESPONSE FORM

Design in the Planning Process (Consultation)

Date: 6 October 2014 - 16 January 2015

Name	Linda Jones	
Organisation	Acanthus Holden	
Address	Waterman's Lane, The Green Pembroke	
E-mail address	Linda@acanthus-holden.co.uk	
Telephone	01646685472	
Type <i>(please select one from the following)</i>	Business	<input checked="" 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)	<input type="checkbox"/>
	Other (other groups not listed above)	<input type="checkbox"/>

Q1	Design Quality	<input checked="" type="checkbox"/>
	Is the planning system effectively delivering the five key objectives of good design? Give reasons for your answer.	
	Yes	
	Neither Yes nor No	<input checked="" type="checkbox"/>
	No	

Q1 Further Comments

There are many elements to good design, some more objective like access and others like character that are more subjective. If the planning system was effectively delivering the five key objectives then there would be no bad design.

The importance of each of the five objectives of good design varies from scheme to scheme. Some aspects are met more effectively than others in the planning system. Other issues are best dealt with under Building Regulations, some (often movement) are often outside the scope of the control of the applicant, (eg bus services).

Q2	Local Development Plans	<input checked="" type="checkbox"/>
	Do you agree that a national development management policy on design would be beneficial?	
	Yes	
	Neither Yes nor No	
	No	<input type="checkbox"/>

Q2 Further Comments

Good design is more than the sum of the parts – a tick box approach is unlikely to result in a good design.

Good design takes into consideration lots of elements, some technical some aesthetic. That is why architects train for 7 years!

If you want to improve design one route could be to encourage/require designs to be produced by those who are trained and qualified to design.

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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	yes
	Neither Yes nor No	
	No	

Q3	Further Comments

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	
	Neither Yes nor No	
	No	no

Q4	Further Comments
Good design takes into consideration lots of elements, including site analysis. To architects this is a basic starting point.	

**A prescriptive list would not suit all proposals and be unhelpful.
A tick box list does not equal good design.**

If you want to improve design one route could be to encourage/require designs to be produced by those who are trained and qualified to design.

It may be useful to those not trained in design, but there is already a huge amount of design guidance already published by various organisations.

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-applications need to be worthwhile. A response to a specific question over a site that simply tells you the site is within settlement limits for example is a waste of everyone's time, effort and money.

A concern I have is that the *'the level of detail required for both the publicity and pre-application consultation requirements in terms of plans and supporting information will be the same as would be required for any subsequent planning application'*. Three reasons for this concern.

- 1. The cost and risk to the applicant at this early stage of the design process to provide in essence a 'draft planning application' when you have not had any input from the planning authority.**
- 2. This process would seem to preclude the ability to be able to have early 'in principle' discussions with a planning officer.**
- 3. Is there a danger that LPAs will bring in validation criteria for pre-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?

Q7

Access

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

Yes

Neither Yes nor No

No

Q7

Further Comments

In my view inclusive access issues are already covered and amendment this is unnecessary if some form of Design and Access Statement is retained. I also question as to whether a space to place a reason in the form provide sufficient space to adequately explain issues as to why inclusive access cannot be achieved?

Q8

Access

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

Being consistent.

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?

Encourage/ promote architects and those trained in design to design our built environment. Encourage professions to share knowledge and events.

--

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?		

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		
No		

Q11	Further Comments	

Q12	Design Skills and Good Practice	
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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?

Q13 Design and Access Statements

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

Yes

yes

Neither Yes nor No

No

Q13 Further Comments

From a design point of view a Design and Access Statements are a useful tool to help explain a design. They give an opportunity to highlight constraints for example and why a design has evolved as it has. It can also provide a useful why of signposting issues and how they have been dealt with.

The concept took a while to be established and I am aware that poor Design and Access Statements were produced.

There was also a period where Design and Access Statements were in my view mistreated and became a tickboxing battleground. Applications were often returned for spurious omissions or because busy officers read only headings and missed the text. The challenge was to get an application validated first time!

This has improved but there are still issues.

This is what gives the Design and Access Statement a bad press.

I would vote for keeping them but the LPAs need to take responsibility for their part to really make them a success.

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		no

Q14 Further Comments

From a design point of view Design and Access Statements are a useful tool to help explain a design. They give an opportunity to highlight constraints for example and why a design has evolved as it has. They can also provide a useful way of signposting issues and how they have been dealt with.

The type of applications for which they are required could however be reduced. The policy clarification letter asks for information submitted to be proportional to the development, but I don't think they are necessary on smaller planning applications, (some householder applications). Design and Access Statements should however be required in areas with special designations and listed buildings where they provide a useful vehicle for explaining a scheme and how it responds to the designation.

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.

A lot of emphasis seems on design satisfying polices or criteria or objectives. It sounds like design by tick boxes. Good design is more than the sum of the parts – a tick box approach may help but is as likely as not to result in a good design.

I believe that it is the case that a high percentage of planning applications for buildings are not submitted by architects. You wish to improve design – but most applicant do not employ an architect of someone trained in design.

Why not set out design-based qualification requirements for certain size applications and use the training and expertise which has been invested in and which is available?

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

RNIB Cymru consultation response to Design in the Planning Process

15 January 2015

The built environment has a massive impact on the independence of blind and partially sighted people. The accessibility of the built environment can be a crucial factor in determining whether people with sight loss are able to live independent and active lives within their local area. RNIB Cymru has already expressed out serious concerns about removing the mandatory requirement for Design and Access Statements in our response to the Positive Planning consultation, and we would reiterate these concerns here. We urge the Welsh Government to reconsider this proposal.

1. About RNIB Cymru

RNIB Cymru is Wales' largest sight loss charity. We provide support, advice and information to people living with sight loss across Wales, as well as campaigning for improvements to services and raising awareness of eye health and the issues facing blind and partially sighted people.

2. About sight loss

There are currently nearly 100,000 people in Wales living with sight loss. The number of people living with sight loss is projected to increase significantly over the next 25 years due to the ageing population.

Sight loss has a huge impact on both individuals and society. People with sight loss are ninety per cent more likely to have a fall than a sighted person, are much more likely to live in poverty, suffer from depression, be unemployed and have problems with everyday life such as going out, cooking and reading.

Sight loss significantly affects a person's mobility. One aspect of rehabilitation provided by social services is to support people to cope with the external environment – traffic, public transport and getting around their community. However, going out alone requires confidence and resourcefulness. The more difficult the built environment is to negotiate, the more likely it is that blind and



Yn cefnogi pobl
â cholled golwg
Supporting people
with sight loss

RNIB charity nos. 226227,
SC039316 and 1109
RNIB rhifau elusen 226227,
SC039316 a 1109

partially sighted people will avoid it, forcing them to seek help they didn't previously need or to abandon the attempt completely.

3. Response to the consultation questions

We have not responded to all the consultation questions; however we would like to make comments on the following areas:

Q.1. Is the planning system effectively delivering the five key objectives of good design? Give reasons for your answer.

We do not believe that the planning system is currently effectively delivering the five key objectives of good design. This is because one of the five key objectives of good design is access, and ensuring ease of access for all. Feedback from the engagement activities conducted to inform Welsh Government's Framework for Action on Independent Living (2013) was that there were a number of concerns with the implementation of planning policy and the requirements of building regulations, which questioned whether, in practice, buildings are still being built, or refurbished, by the private and public sectors, which are fully accessible by everyone.

It is our experience that blind and partially sighted people are being significantly disadvantaged, and put in danger, by a failure to take their access requirements into account. For example, we are aware of several recent schemes which have overlooked the needs of people with sight loss, such as in the redevelopment of Aberystwyth Bus Station, changes to the bus station in Newport, and the regeneration of King Street, Wrexham. In some cases, the result of this has been costly retrospective repairs, which is clearly not efficient or effective. For further details we would refer to Guide Dogs Cymru's Environment Report, submitted to Welsh Government as part of their response to the previous Planning Together consultation.

Q2. Do you agree that a national development management policy on design would be beneficial?

Yes. We agree that a national approach would achieve more consistency across Wales. Within the suite of national development management policies we would recommend that

there is one that specifically addresses inclusive design and accessibility.

Q4. 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. This must include guidance on achieving inclusive design for all.

Q5. 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?

To ensure inclusive access of developments, it is vital that people with sight loss are meaningfully involved in pre-application discussions. This will mean finding alternative ways of communicating some of the printed information that would typically form part of these discussions.

RNIB Cymru are aware of several examples of where successful pre-planning engagement is taking place in Wales:

- Cardiff Council Access Focus Group (CCAFG) is a consultative forum of people with protected characteristics, supported by the Council and convened by its own Access Officer. It meets regularly to discuss proposals which impact on the public realm, as well as transport and local facilities. A number of the group are blind and partially sighted, thus tactile models, as well as site visits, have been organised, to ensure that the real impact of proposals are fully understood.
- There is a similar initiative in Swansea (known as SAFE) and a new group in Ceredigion. From both there are examples of where engagement can help a local authority to reduce costs and enhance co-production by taking into account the impact of proposals on the community it serves.

Other examples of good practice are highlighted in the online resource produced by Disability Wales as part of their Way to Go project, funded by the Welsh Government.

Q7. Do you agree that the amendments to the 1APP form will ensure inclusive access issues are considered in development proposals?

We would support an approach which ensures that access issues are considered from the outset, rather than as a ‘bolt on’. However, we believe that the proposed amendment to the 1APP form is unlikely to achieve this as it stands; simply asking where inclusive access has not been achieved and why is not sufficient. As a minimum, we would expect an explanation of what other options have been explored, and what steps will be taken to mitigate the impact of this.

We would also like to know what process will be taken to validate this information, as we know that inclusive design as it applies to blind and partially sighted people is not well understood. We are concerned that the amendment to the 1APP form appears to rely too heavily on a self-assessment of where the applicant believes there is an access issue – if their understanding of inclusive design is poor, it is likely that they will overlook some access issues and compliance will diminish to the basic minimum required to allow for physical access – for example, ramps, wider doors and lifts.

Q8. What information or other measure would assist local planning authorities assess planning proposals in terms of inclusive access?

We would maintain that Design and Access Statements would assist local planning authorities to assess planning proposals and meet their requirements under the Public Sector Equality Duty.

Q9. How can the PAIS and DCfW mainstream good design and inclusive access in the planning process?

As identified in the Welsh Government’s Framework for Action on Independent Living, it is important to ensure that access in its broadest sense is understood by those assessing planning applications, so that these considerations are mainstreamed and

implemented more widely. The Framework includes a requirement for action to improve the skills and understanding amongst design professionals in relation to inclusive design, and to upskill the construction industry in this area. PAIS and DCfW should provide training to address this skills gap.

RNIB Cymru also believe that the PAIS and DCfW should take responsibility for implementing the programme of training and capacity building on DAS, recommended in the review undertaken for the Welsh Government.

In addition, there needs to be increased understanding of how to conduct effective equality impact assessments, and ensure that they inform decisions. This must include how to engage with local communities, and how to remove barriers to engagement. For example, blind and partially sighted people are often disengaged from consultation or engagement activities because of a reliance upon printed information that is not available in a format accessible to them. In addition, where there are verbal explanations given (eg as part of engagement exercises), these often fail to explain proposals in a way that is meaningful to a lay person. DCFW and PAIS need to support a better understanding of how to engage inclusively, and offer advice on alternative means of communication such as tactile plans or site visits, clear verbal explanation and develop guidance in organising an inclusive engagement process.

We would also suggest that there should be a role for PAIS and DCfW in providing training for local access groups, to ensure that they understand the planning system and ways of achieving inclusive design.

Q10. How can we continue to raise the design skills of local authority officer and members and what further specific training is required?

RNIB Cymru would like reassurance that all elected members involved in scrutinising and approving proposals understand the legal requirement to engage with people with protected characteristics. For example, in the case of Aberystwyth Bus station, engagement did take place with the local business

community, police, and some community organisations, but not with any representing disabled people. It is concerning that a scheme which was inherently dangerous got through the approval process and has resulted in Ceredigion having to meet the cost of retro fitting at a time of huge financial constraint.

Q12. 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?

As previously mentioned, we are aware of several examples of good practice which have led to the achievement of inclusive access. For example, Cardiff Council's Access Focus Group, engagement work in Swansea on the re-design of the rail station, and the work with Disabled People Together in Ceredigion.

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

Yes. As stated in our response to the Positive Planning consultation, we are gravely concerned about the impact of removing mandatory requirements for Design and Access Statements (DAS). RNIB Cymru is concerned that without DAS, questions of accessibility will be neglected in many developments, with consequent adverse impact on blind and partially sighted people.

While the review of DAS identified issues in the effectiveness of DAS, it did not recommend that the mandatory requirement was removed. Rather, it found that overall DAS were supported as a tool in the planning process, and made recommendations principally on refining the system. In particular, it has been recognised that DAS act as a useful communication tool in the planning process. We would therefore recommend that the requirement for DAS is retained and that changes focus on strengthening the process.

Q14. Should the mandatory requirement for Design and Access Statements be removed from secondary legislation? Give reasons for your answer.

No – as we have previously stated, RNIB Cymru opposes removing the mandatory requirement for Design and Access Statements. Our position has not changed. We are seriously concerned that removing the mandatory requirement will diminish compliance to meet the basic minimum required to allow for physical access (such as ramps, wider doors and lifts), and overlook additional issues necessary to ensure accessibility for blind and partially sighted people. Our members tell us of the daily challenges they face in negotiating buildings and environments designed in a way that takes no account of their needs, and the impact that this has upon their lives. We urge the Welsh Government to do more to make Wales a safer and better place to live for people with sight loss.

4. Further information

For further information please contact Tess Saunders, Policy and Campaigns Officer on 029 2082 8564 or email tess.saunders@rnib.org.uk.

FFURFLEN YMATEB I YMGYNGHORIAD

Dylunio yn y Broses Gynllunio (Ymgynghoriad)**Dyddiad: 6 Hydref 2014 - 16 Ionawr 2015**

Enw	Aled Davies	
Sefydliad	Cyngor Gwynedd	
Cyfeiriad	Pennaeth Adran Rheoleiddio 1 Stryd y Jêl Caernarfon Gwynedd LL54 1SH	
Cyfeiriad e-bost	Aleddavies@gwynedd.gov.uk	
Rhif ffôn	01286 670 370	
Math (<i>dewiswch un o'r rhain</i>)	Busnes	<input type="checkbox"/>
	Awdurdod Cynllunio Lleol	<input checked="" type="checkbox"/>
	Un o Asiantaethau'r Llywodraeth / Sefydliad Arall yn y Sector Cyhoeddus	<input type="checkbox"/>
	Corff Proffesiynol / Grŵp Buddiant	<input type="checkbox"/>
	Sector gwirfoddol (grwpiau cymunedol, gwirfoddolwyr, grwpiau hunangymorth, sefydliadau cydweithredol, mentrau, sefydliadau crefyddol, sefydliadau di-elw)	<input type="checkbox"/>
	Arall (grwpiau eraill heb eu rhestru uchod)	<input type="checkbox"/>

C1	Ansawdd Dylunio	x
	A yw'r system gynllunio'n cyflawni pum amcan allweddol dylunio da mewn modd effeithiol?	
	Ydy	
	Dim un o'r rhain	x
	Nac ydy	

C1	Sylwadau Pellach
<p>Ydy i raddau ond mae hyn yn ddibynnol ar ansawdd y cais a'r gallu gan y swyddog i negodi am welliant os oes angen. Gwan iawn yw'r sefyllfa bolisi cynllunio cenedlaethol er mwyn cyflawni a chyfiawnhau'r 5 amcan 'allweddol' yn effeithiol ac mae'n sefyllfa fregus ac annodd ceisio negodi a chael y balans yn gywir. Hyn hefyd yn ddibynnol ar natur a graddfa'r bwriad - yn fwy disgwyliadwy o gynlluniau mwy gan nad yw'r 5 amcan yn berthnasol i bob dim.</p>	

C2	Cynlluniau Datblygu Lleol	x
	A ydych yn cytuno y byddai polisi rheoli datblygu cenedlaethol ar ddylunio yn beth buddiol?	
	Ydw	x
	Dim un o'r rhain	
	Nac ydw	

C2	Sylwadau Pellach
<p>Maent fel arfer yn faterion generic ac felly mae hyn yn gwneud synnwyr gyda CCA i gefnogi nodweddion dylunio o fewn ardal benodol. Mae angen osgoi creu stryd fawr a stadau tai o'r unfath ym mhob tref a rhoi mwy o bwyslais ar nodweddion a chymeriad lleol tra hefyd yn cydnabod gwerth dyluniad modern. Nid yw'r drefn bresennol yn rhoi arf digonol i wneud hyn.</p>	

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C3	Canllawiau Cynllunio Atodol	X
	A yw cynlluniau ar gyfer ardaloedd a safleoedd penodol, megis uwchgynlluniau, yn cael eu defnyddio i gynllunio datblygiadau allweddol mewn modd cadarnhaol? A allwch chi roi enghreifftiau o arferion da yn hyn o beth?	
	Ydyn	
	Dim un o'r rhain	X
	Nac ydyn	

C3	Sylwadau Pellach

C4	Canllawiau Cynllunio Atodol	X
	A ydych yn cytuno y dylai Llywodraeth Cymru baratoi canallwiau ymarferol ar sut i ddadansoddi safleoedd fel y bo modd datblygu cynigion a fydd wedi'u dylunio'n dda?	
	Ydw	
	Dim un o'r rhain	X
	Nac ydw	

C4	Sylwadau Pellach
Ddim yn sicr pa werth fyddai i hyn - ystyrir y dylai dadansoddi safleoedd fod yn fater sylfaenol wrth ddylunio cynigion newydd. Fel ymarfer da, dylai ffurfio rhan ddisgwyliedig ac allweddol i waith cynllunio/paratoi cais ac fe ddylai hyn fwydo i mewn i gynigion er mwyn sicrhau dylunio	

da. Yn bosibl fod canllaw mor sylfaenol a disgrifiadol yn ddiangen ac o ychydig werth ac y byddai mwy o fudd/gwerth cael canllawiau/polisi cenedlaethol fyddai'n datgan yn glir na fydd datblygiadau nad ydynt wedi'u dylunio'n dda neu'n briodol i'w lleoliad yn cael eu cefnogi a bod angen egluro fel rhan o'r cais sut mae'r dadansoddiad o'r safle wedi arwain at y dyluniad penodol. Oes elfen o ddyblygu yma gyda'r Datganiad Dylunio a Mynediad presennol?

Ni ystyrir y byddai canllaw o'r fath yn darparu arf digonol i gefnogi safon well o ddylunio sy'n adlewyrchu neu'n ategu nodweddion lleol.

C5

Rhoi Mwy o Bwyslais ar Waith Rhagarweiniol / Trafodaethau Cyn-ymgeisio

Sut y gallwn ni sicrhau bod trafodaethau cyn-ymgeisio yn helpu i wella dyluniad datblygiadau ac yn sicrhau mynediad cynhwysol? Allwch chi roi enghreifftiau o arferion da yn hyn o beth?

Drwy ffurfioli'r angen i gynnal trafodaethau cyn cyflwyno cais ar geisiadau mwy ac er mwyn sicrhau fod dadansoddiad o'r safle/ardal wedi ei gynnal. Dylid hyrwyddo hyn fel ymarfer da ac nid ei gyflwyno fel gofyniad statudol.

C6

Ceisiadau Cynllunio

Heblaw am ragor o hyfforddiant neu ganllawiau ymarferol pellach, pa bethau eraill fyddai'n eich helpu i asesu ansawdd y dylunio mewn cynigion cynllunio?

Sicrhau fod polisiâu cenedlaethol yn gryfach (a llai amwys) o safbwynt gallu gwrthod dylunio gwael, rhad yr olwg a generic nad yw'n ategu nodweddion a chymeriad lleol. Byddai hyfforddiant dylunio o ddefnydd a'r gallu i rannu esiamplau o ymarfer da. Mae bosib y gall Comisiwn Dylunio Cymru a Phenseiri fod yn rhan o'r hyfforddi ar gyfer Swyddogion Cynllunio ac Aelodau'r Pwyllgor Cynllunio.

Mae cyfle i hyrwyddo dyluniad drwy gael canllaw cenedlaethol sydd yn annog ymarfer da ar gyfer datblygiadau o faint / math penodol – gyda'r angen i fynd drwy'r broses o gyfiawnhau sut mae dyluniad datblygiad wedi esblygu. Dylid dileu'r angen am y drefn statudol gyfredol o Ddatganiadau Dylunio a Mynediad sydd i raddau helaeth yn ychwanegu dim at y broses

gyfredol.

C7	Mynediad	
A ydych yn cytuno y bydd y newidiadau i'r ffurflen 1APP yn fodd i sicrhau bod materion yn ymwneud â mynediad cynhwysol yn cael eu hystyried mewn cynigion datblygu?		
Ydw		x
Dim un o'r rhain		
Nac ydw		

C7	Sylwadau Pellach	
Mae angen ystyried hyn yn fuan yn y broses dylunio gan y gall ddylanwadu ar sut mae'r datblygiad yn esblygu		

C8	Mynediad	
Pa wybodaeth neu gamau eraill fyddai'n cynorthwyo awdurdodau cynllunio lleol i asesu cynigion cynllunio o ran mynediad cynhwysol?		
Os, er enghraifft, fod newid defnydd o adeilad neu anhawsterau eraill o safbwynt darparu mynediad cynhwysol byddai o fudd gallu gofyn am eglurhad o ba drefniadau/fesurau eraill a ystyriwyd. Dylai fod hyn hefyd yn rhan o ymarfer da cenedlaethol ar gyfer gwybodaeth sydd angen ei ystyried a'i gyflwyno gan ymgeiswyr ar gyfer datblygiadau perthnasol.		

C9	Comisiwn Dylunio Cymru a'r Gwasanaeth Gwella a Chynghori ar Gynllunio	
Sut y gall y Gwasanaeth Gwella a Chynghori ar Gynllunio a Chomisiwn Dylunio Cymru brif ffrydio dylunio da a mynediad cynhwysol yn y broses gynllunio		

Y Broses Comisiwn Dylunio yn broses araf a chostus i'r datblygwr - hefyd ond yn addas ar gyfer rhai cynlluniau. Mae'n ychwanegu haen arall i'r broses ac nid oes rheidrydd i'r datblygwr dderbyn y farn a roddir. Nid yw'n broses gynhwysol ac mae'n gallu bod yn orfeirniadol / yn ddibynnol ar farn amrywiol yr unigolion sydd yn eistedd ar y Panel.

Byddai hyfforddiant i swyddogion ac aelodau sy'n cael ei gynnal gan y Comisiwn yn fwy gwerthfawr er mwyn rhannu ymarfer da a sicrhau'r amcanion uchod.

C10

Sgiliau Dylunio ac Arferion Da

Sut y gallwn ni barhau i wella sgiliau dylunio swyddogion ac aelodau'r awdurdodau lleol a pha hyfforddiant penodol arall sydd ei angen?

Mae hyfforddiant dylunio sy'n briodol i swyddogion cynllunio yn brin ac yn fater sy'n cael ei godi yn gyson gan swyddogion. Byddai cynnig hyfforddiant sy'n weddol lleol yn gam ymlaen i sicrhau'r sgiliau cywir ar gyfer asesu dylunio. Yng nghyd destun aelodau'r awdurdod lleol byddai hyfforddiant annibynnol yn ymwneud gydag egwyddorion cynllunio sylfaenol yn ddefnyddiol iawn o safbwynt rhoi barn ar geisiadau cynllunio. Buasai'r un math o hyfforddiant hefyd yn fuddiol i Aelodau'r Pwyllgor Cynllunio.

C11

Sgiliau Dylunio ac Arferion Da

A oes lle i awdurdodau cynllunio lleol weithio mewn ffordd wahanol neu i gydweithredu mwy ar faterion yn ymwneud â dylunio? A ydych yn gwybod am unrhyw weithgarwch o'r fath sy'n cael ei wneud ar hyn o bryd?

Oes	x
Dim un o'r rhain	
Nac oes	

C11

Sylwadau Pellach

Mae cydweithio o fewn sawl maes cynllunio yn digwydd ar draws gogledd Cymru gyda Grwp Swyddogion Cynllunio (Pennaethiaid) Gogledd Cymru yn gosod cyfeiriad ar gyfer is-grwpiau sydd yn delio gyda Rheolaeth Datblygu, Gorfodaeth, Cadwraeth, Biomarywiaeth, Tirlunio a Choed. Mae'r cydweithredu eisoes yn cynnwys:

Rhannu Hyfforddiant
Comisynu gwaith hel tystiolaeth ar y cyd
Rhannu ymarfer da yn lleol

Gall hyn gael ei ehangu i gynnwys creu Canllaw Cynllunio Atodol ar y cyd.

C12

Sgiliau Dylunio ac Arferion Da

A allwch chi amlinellu arferion da, yng Nghymru neu tu hwnt, mewn perthynas ag unrhyw un o'r materion uchod, sy'n hyrwyddo a/neu'n arwain at ddylunio da a mynediad cynhwysol?

O brofiad mae datblygwr sydd wedi gofyn am gyngor cyn cais ac sydd wedi buddsoddi yn y broses dylunio wedi cael gwerth o wneud hynny drwy gael penderfyniad sydyn a di-lol ac/neu gael datblygiad o safon uwch.

C13

Datganiadau Dylunio a Mynediad

X

A fyddai unrhyw fanteision o gadw'r gofyniad i gyflwyno Datganiadau Dylunio a Mynediad ar gyfer ceisiadau penodol?		
	Byddai	x
	Dim un o'r rhain	
	Na fyddai	

C13	Sylwadau Pellach
<p>Yn fwy priodol ar gyfer ceisiadau mwy ond fel ymarfer da yn unig ac nid fel gofyn statudol. Y tueddiad gyda cheisiadau llai yw nad ydy'r DDM o unrhyw werth i'r broses.</p>	

C14	Datganiadau Dylunio a Mynediad	x
<p>A ddylid dileu'r gofyniad gorfodol i gyflwyno Datganiadau Dylunio a Mynediad o'r is-ddeddfwriaeth? Rhowch resymau dros eich ateb.</p>		
	Dylid	x
	Dim un o'r rhain	
	Na ddylid	

C14	Sylwadau Pellach
<p>Er mwyn cynnig hyblygrwydd i'r dyfodol a gallu cyflwyno newid yn sydyn ac i osgoi cymhlethdodau sydd yn gallu arafu'r broses gynllunio.</p>	

C15	Unrhyw Sylwadau Eraill	
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Rydym wedi gofyn nifer o gwestiynau penodol. Os ydych am godi unrhyw faterion cysylltiedig neu awgrymu ffyrdd o wella dylunio drwy'r system gynllunio, byddem yn falch o gael gweld yr hyn sydd gennych i'w ddweud.

Mae angen gweld gwerth i ddylunio da a'i hyrwyddo fel rhywbeth cadarnhaol er mwyn cael gwell safon i ddatblygiadau, yn ogystal â datblygiadau sy'n adlewyrchu ac ategu nodweddion lleol. Cydnabyddir fod dylunio yn fater o farn ond ystyrir bod angen gwell fframwaith er mwyn gallu negodi am ddyluniad o safon. Ystyrir fod y caullawiau/polisiau cenedlaethol presennol yn rhy feddal i sicrhau fod dylunio da yn cael ei weld fel y safon arferol yn hytrach nac fel eithriad.

Sut i ymateb

Dylech gyflwyno'ch sylwadau erbyn **16 Ionawr 2015** mewn unrhyw un o'r ffyrdd a ganlyn:

E-bost	Post
Llenwch y ffurflen ymgynghori a'i hanfon i planconsultations-a@cymru.gsi.gov.uk / planconsultations-a@wales.gsi.gov.uk [Rhowch 'Ymgynghoriad ar Ddylunio yn y Broses Gynllunio' fel pwnc]	Llenwch y ffurflen ymgynghori a'i hanfon i Ymgynghoriad ar Ddylunio Y Gangen Polisi Cynllunio Yr Is-adran Gynllunio Llywodraeth Cymru Parc Cathays Caerdydd CF10 3NQ

Rhagor o wybodaeth

Os oes gennych unrhyw gwestiynau am yr ymgynghoriad hwn, mae croeso i chi gysylltu â:

E-bost: planconsultations-a@cymru.gsi.gov.uk

Ffôn: Max Hampton ar 02920 82 6166

CONSULTATION RESPONSE FORM

Design in the Planning Process (Consultation)

Date: 6 October 2014 - 16 January 2015

Name	Dr. Del Morgan	
Organisation	Un Llais Cymru/One Voice Wales	
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E-mail address	del.morgan@onevoicewales.org.uk	
Telephone	01269 595400	
Type <i>(please select one from the following)</i>	Business	<input type="checkbox"/>
	Local Planning Authority	<input type="checkbox"/>
	Government Agency / Other Public Sector	X
	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>It is apparent that whilst there are some well designed schemes they usually correlate with high profile publicly sponsored projects, high land values or well resourced clients. The every-day volume house-builder schemes or individual householder applications are often of poor quality. In the case of house-builders, the practice of reproducing existing house types has not reduced greatly since design guides/briefs have become the norm – certainly not in proportion to the amount of guidance available.</p> <p>Better outcomes do not relate to guidance alone, but require structural change in the wider development industry and greater interest on the part of the public and elected representatives – including Community and Town Councils.</p> <p>Because of the lip service often resulting from the need to cover all five of the design objectives in Design and Access Statements, the DAS should possibly be reconsidered with greater discretion to develop particular points.</p>

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

Q2	Further Comments
	(In order to provide clarity and consistency to Local Authorities and the public.)

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	
	No	

Q3	Further Comments
<p></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
<p>The guidance produced should, however, be addressed to the practitioner, to elected representatives at Principal Councils and at the Community and Town Council Sector and also the general public. Given the relative lack of impact across the vast majority of the built environment, the existing (mainly professionally oriented) guidance should be expanded to include considerations which the public and elected members</p>	

should take account of in assessing schemes. This is particularly relevant to the Community and Town Council Sector – who may be involved in producing Supplementary Planning Guidance linked to other proposals associated with the Planning Bill.

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?

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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?

Guidance should be alive to the emerging opportunities through social media and interactive design to shift the emphasis, in appropriate situations (for example, major applications or SPG) towards a more inclusive process. This is a dynamic situation and any replacement DAS package should be similarly dynamic.

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

Q7

Further Comments

Q8

Access

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

Include the Community and Town Council sector at all stages of the process.

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?

Both organisations, in relation to their on-going remit, should incorporate the localist and front loading philosophy tentatively embraced in other proposals for the LDP Process, Place Plans and SPG formulation by the Community and Town Council Sector and the front loading consultation on major applications. Design will become less of a “done to and for” exercise and more of an inclusive process. This will require resources both in the delivery of mainstream training and in respect of other support for individual councils in the Community and Town Council Sector and other community groups. The former can be assisted as mooted by PAW and One Voice Wales training modules.

One Voice Wales can be particularly useful as it can ensure training is relevant in the context of other changes presently emerging to increase the size of Local Authorities and in terms of “austerity” measures potentially aimed at the devolution of physical/environmental services to the Community Sectors.

As the front loading agenda becomes established and legitimised there will be opportunities for planning professionals to work with the Community and Town Council Sector, who can budget for this, overcoming in part the lack of resource at the LPA 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 answers to other questions.

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

X

Neither Yes nor No

No

Q11**Further Comments**

Whilst Principal Authorities can work horizontally to share best practice they can also work vertically with Community and Town Councils and community groups – to shift the design paradigm to one in which it is less a matter of “done to and for” but more of a situation where there is more inclusion, as noted under Q9. Some councils are beginning to address this in emerging community and place plans. This will require underpinning by training as noted in answer to other questions.

Structurally the front loading proposals in relation to major applications and the LDP/SPG process should aid the change in mind-set, and they should also underline the understanding that design is far more than visual appearance and vehicular access.

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?

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Q13	Design and Access Statements	
	Are there any benefits in retaining the requirement for Design and Access Statements for particular applications?	
	Yes	X
	Neither Yes nor No	
	No	

Q13 Further Comments

(Agree emphatically.) One Voice Wales has said in oral evidence to the Bill Committee that it has a powerful role in communicating proposals to the Community and Town Council Sector, a sector that spends a significant amount of time dealing with grass roots reactions to applications besides the time spent extracting relevant information from the application forms and plans.

In the context of a trained and resourced council, a DAS can highlight legitimate areas for attention and frame the observations to the LPA. This would ensure that the costly exercise of considering applications is efficient, directed, adds value and gives more weight to observations by the Community and Town Council Sector.

Seen as a communication tool, they could be more selective in the information required, with less of an appearance of “going through the motions” but rather providing the opportunity to explain constraints, opportunities and the response in terms of design and layout or other material matters. They should clearly be part of major applications and applications in designated conservation areas and environmentally sensitive situations – but leaving the opportunity for the applicant to provide them for other applications.

Q14	Design and Access Statements	
	Should the mandatory requirement for Design and Access Statements be removed from secondary legislation? Give reasons for your answer.	
		X

Yes	
Neither Yes nor No	
No	

Q14	Further Comments

Q15	Any Other Comments
<p>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.</p>	

One Voice Wales is recognised by the Welsh Government as the national representative body for community and town councils in Wales. It represents the sector on the Local Government Partnership Council and over three-quarters of the 735 community and town councils are already in membership, with numbers growing year on year. As well as our representative role, we also provide support and advice to councils on an individual basis and have previously launched, with Welsh Government support, a modular training programme for councillors, which continues to deliver effectively. We believe strongly that community councils are well-placed to develop the economic, social and environmental well-being of the areas they serve and, as such, are active and proactive in debating key issues such as energy policies, environmental issues and strategic planning. Our sector will support and wish to participate in much of the locally based aspects of planning and strategic planning, and it is hoped that any changes to be brought about will not prevent our members from becoming increasingly enabled to do so.

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:</p> <p>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
<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>

CONSULTATION RESPONSE FORM

Design in the Planning Process (Consultation)**Date: 6 October 2014 - 16 January 2015**

Name	Marcus Goldsworthy	
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Telephone		
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	X
	Neither Yes nor No	
	No	

Q1	Further Comments
	In the Vale of Glamorgan design is taken very seriously and the officers all receive training on design issues. Good quality guidance and monitoring to ensure design issues are properly considered as important along with assessing results after developments are complete.

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

Q2	Further Comments
	Strong national guidance on design specific issues is very important and would be enhanced by national guidance on this matter through an update of TAN12

Q1	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	X
	Neither Yes nor No	
	No	

Q3 Further Comments
SPG and master plans are important especially in regard of larger developments and sites although the Council's ability to undertake the work is being severely reduced by funding cut backs and the amount of time taken to produce the LDP.

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	
	Neither Yes nor No	X
	No	

Q4 Further Comments
Most authorities are fully aware of how to produce such guidance and there are other important issues WG should be focusing on.

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/Front Loading only works where developers are willing to take on board the advice given to them by Council planners. The Vale of Glamorgan can point to both good and bad examples where developers have completely ignored the advice given to them.

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?

Update and review of Manual for streets

Q7

Access

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

Yes

Neither Yes nor No

No

X

Q7

Further Comments

This is extremely unlikely as Councils previously used their own forms and in the Vale of Glamorgan poor quality applicants and agents always circumvented such an approach.

Q8

Access

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

The WG consultation paper fails to recognise that the predominant role in producing good design and access lies with developers, and is not primarily an issue of LPA's capability in assessing design or access arrangements. In turn cost is the main driver for developers and architects and will generally overrule practice advice and pre-application negotiation if a lesser approach can be justified within planning regulations. Inclusive access would need to be included in building regulations or other requirements. It is much harder to be prescriptive about design and ultimately developers have to have considerable freedom over their developments. Design and access statements do play a valuable role in dealing with such issues.

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?

Provide up to date training materials and advice for officers and councillors, as well as developers and architects. DCfWPAIS should liaise with professional bodies and education institutions to promote principles and practice of good design and inclusive access.

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?

The design skills of Local Authority officers and members are not the limiting factor in

generating good design (see response to Q8). Some developers' weak capability or unwillingness to improve design needs to be addressed.

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
Wales wide guidance provides this and it is unlikely that specific design issues will cross council boundaries. In respect of training it could be possible to hold joint Council training events – although this has already happened in the Vale of Glamorgan and Bridgend.	

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?	
Visiting completed schemes and getting Members/officers to honestly assess developments	

Q13	Design and Access Statements	X
	Are there any benefits in retaining the requirement for Design and Access Statements for particular applications?	
	Yes	X
	Neither Yes nor No	
	No	

Q13	Further Comments
<p>D&A statements can be important for major applications, minor housing applications and in respect of all developments save possibly for householder in conservation areas. Other designated areas such as Heritage Coast and Special Landscape Areas may also benefit along with developments adjacent to Listed Buildings.</p>	

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
<p>The WG consultation paper (para 16) says “We believe expectations are best delivered through a planning system which is clear and transparent and expects design issues to be considered from the outset”. Clear expectations need design and access advice, and also a framework for discussion and negotiation which is what DASs provide. The criticisms of DAS in the Grimley study may be opposition to the constraint and potential cost of good design and access discussions; a sign of DAS effectiveness rather than weakness. The criticisms of DAS about being ineffective in promoting inclusive access could signal the need to strengthen use of DAS and access criteria, rather than a need to remove DAS.</p>	

Q15	Any Other Comments
<p>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.</p>	

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>

CONSULTATION RESPONSE FORM

Design in the Planning Process (Consultation)

Date: 6 October 2014 - 16 January 2015

Name	Ryan Thomas	
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Telephone	01792 635731	
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>Access – Access for all to buildings is typically guided by the requirements of Building Regulations and Planning Officers typically defer to these requirements. As a result, access is sometimes left to later stages by the applicant rather than being addressed as an integral element of the planning process.</p> <p>Character – The majority of Planning Officers typically appraise the character of an area through their site visits and address issues of character through negotiation during the planning process if the applicant/design team have not made an accurate or thorough assessment and understanding of the local context. However there can be inconsistencies in terms of the weight placed on the importance of maintaining and enhancing good aspects of character. Areas where there are not immediately obvious character features of the locality are more problematic and poor design is often justified on the basis of a lack of character.</p> <p>Community Safety – This objective is often met through the provision of tried and tested approaches to layouts (e.g. perimeter blocks) as well as principles of good design such as providing natural surveillance and good lighting on streets. However the typical objectives of good design such as choice of routes, connected layouts, people utilising the street for social gathering and informal play etc. are often at odds with the Crime Prevention Design Advisors who seek more controlled, target hardened environment with limited pedestrian routes, cul-de-sac etc.</p> <p>Environmental Sustainability – This objective was previously aided by the various requirements of the Code for Sustainable Homes as part of the planning process, however only those areas specifically related to building fabric and operational use (water efficiency) etc. of individual buildings are now considered under the Building Regulations. Further consideration should be given to strategic issues of sustainability such as assessments of and enhancement to ecology, trees etc. as well as to promoting larger scale and joined up SUDs networks.</p> <p>Movement – Promotion of sustainable means of travel is difficult to achieve in small scale development due to lack of influence on changing/improving public transport infrastructure. Levels of sustainable travel in such cases are typically location reliant. One area where sustainable travel could be improved for such schemes is through dedicated provision for cycle storage. In terms of large scale development schemes there is more scope for influencing the provision of new bus routes etc., however it does not appear that in many cases that developers are engaging with transport operators early in the process nor is this engagement being encouraged through the planning system.</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

This depends on the approach to such a policy. An overly broad requirement to ensure good design is sought will have no further benefit than the requirements as currently set out in TAN 12: Design. However a stronger national statement on achieving schemes that are good enough to approve (i.e. the quality test) rather than poor enough to refuse (harm test) would effectively raise the bar for design negotiations.

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

Q3 Further Comments

We are using master plans and associated sets of 'on plan' principles to set the framework for outline applications for large housing schemes as such plans can be conditioned as part of the planning consent. Such plans are useful as they are flexible to accommodate future changes if necessary whilst also providing a clear site structure, an 'up to' number of dwellings as well as a set of guiding principles.

We will be developing Master planning Principles and Framework Master plans for the candidate strategic sites emerging through the Local Development Plan process. This will provide a firm basis for sustainable place making as well as greater certainty for local communities and developers alike.

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

This could be useful for both planning officers and development teams. In particular such a document should be promoted to developers and applicants with reference to this embedded into exiting planning documents such as PPW and TANs etc. in order to ensure it is used. This would need to cover the regular scenario where an area doesn't have a distinct character or a positive character and how in these instances to promote good design. This practice guidance needs to be backed up by training sessions for officers, elected members and other decision makers such as the Planning Inspectorate.

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?

For larger scale developments this would be by including as far as possible all relevant parties and external consultants in an initial round table meeting to talk though the various requirements of each and any issues that may arise as a result of these initial talks. This would provide a clearer and more joined up response from the outset which in addition to flagging up most/all issues affecting the design would also help to speed up the planning process once this is formally begun. However there are likely to be resource and logistical issues arranging meetings with large numbers of people from different organisations which may conflict with providing a quick response up front.

For smaller applications a short question/tick box form to be completed by the applicant which highlights potential issues arising at the site (Drainage conditions etc.) as well as another to be completed by the planning authority to highlight planning constraints such as Conservation Areas and TPO trees etc. would allow the LPA to make a quicker assessment of the likely issues on site and seek responses from the necessary department/consultants early.

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?

It is considered that an additional validation requirement embedded into the application submission checklist list to ensure that submitted plans and elevations accurately highlight the nearby surrounding context is needed. Often plans and elevations are submitted which treat the proposals in isolation with no indication of surrounding buildings, trees etc.

A means of communicating and disseminating best practice would be very helpful. For example there are no national bench marks with regard to large scale housing developments. These are not featured on the Design Commission for Wales web site.

Q7

Access

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

X

Yes

X

Neither Yes nor No

No

Q7

Further Comments

Mostly. However there may still be a number of application forms where this question is left black/unanswered which are registered and then found to have inclusive access issues at a later date.

Q8

Access

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

Inclusive access requirements vary depending on building types and are covered under Building Regulations. Therefore if proposals are flagged as having inclusive access issues then these could initially be passed onto Building Regulations Officers or local access forum to comment on the possible options for meeting any inclusive access requirements. Once comments/options have been provided then Planning Officers can assess the proposals in conjunction with a better understanding of the requirements for the development.

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?

Mandatory Design Review would be beneficial for strategic or significant development schemes for development types which could have a considerable impact on quality of life such as housing, mixed use, city/town centre redevelopment etc.

A series of Design Commission design training/seminars for all Local Authority Planning Officers which draw on national and local examples of good design would be beneficial. This did happen a number of years ago but the DCfW seems to have shifted focus away from 'front line' design issues faced by LPAs.

A more pro-active approach to the promotion of good design:

1. Part of this could be through the production and distribution of annual or bi-annual newsletters to all LPA's highlighting key projects, examples of good or innovative design, high quality international design approaches, lessons to learn etc.
2. Setting up a national forum of architects, conservation architects, engineers, landscape architects, planners, public art artists, regeneration officers and urban designers to discuss approaches to design and to gain a better understanding of competing interests which influence design.
3. Possibly a national Design Award scheme (beyond the Architecture Medal for the Eisteddfod)

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?

Start with a national skills audit to identify the design 'champions' (in many Councils there are officers that give informal design advice but are recognised in this way – e.g. Conservation Officers)

Further training on the following would be beneficial:

- Site Assessment training.
- Understanding Context training.
- Contemporary Design training.
- Historic Environment & Conservation Area training.

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	X
	Neither Yes nor No	
	No	

Q11	Further Comments
<p>Yes, cross border collaboration on large scale development schemes could be implemented to share resources and knowledge. For example a number of Authorities currently lack appointed urban designers whilst Swansea has 2 qualified urban designers who could be utilised on a consultancy basis for reviewing significant schemes.</p> <p>Also a cross border joint commissioning of design training for all officers could be implemented – this offers economies of scale as opposed to sending individuals on training courses.</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?		
A South Wales Local Authority Urban Designer Network was previously set up which would have helped to promote good design and inclusive access, however this is no longer in existence due to resourcing issues. Such a network or one of wider scope such as that outlined in Q9. would therefore be beneficial in promoting good design and inclusive access.		

Q13	Design and Access Statements	X
Are there any benefits in retaining the requirement for Design and Access Statements for particular applications?		
	Yes	X
	Neither Yes nor No	
	No	

Q13**Further Comments**

It is considered that DAS's are beneficial to gaining an understanding of larger scale schemes, listed buildings, complex site schemes (significant level changes, split level designs etc.) as well as schemes in areas of special designations. Therefore it is considered DAS's should be retained for:

- All major planning applications
- All minor planning allocations in areas of designated importance (including AoNBs, and Conservation areas)
- Listed Buildings

However the structure of these documents should be altered in the following ways:

- Remove the need for the planning policy section as the majority of the time this section is simply replication of the full UDP/LDP policy text with no analysis of the scheme against these. Furthermore there are cases of these sections missing key policies or referring to the wrong policies. Removing this section will leave the onus of the responsibility of policy assessment on the planning case officer.
- Introduce a requirement to reduce the socio-economic section to a brief list of relevant key bullet points such as clear economic benefits such as identifiable job creation or local shop or service provision etc.
- Introduce a requirement for a thorough context analysis which must include the existing surrounding architecture, building to plot ratio, building heights, roof forms, materials, boundary treatments, parking arrangements and vegetation (trees and hedgerows) to help inform the design.
- Introduce the requirement for a site analysis (opportunities and constraints) plan and a logical and rational progression from this plan to the final design with justification text provided.

The focus of these documents should be to provide a clear indication of a thorough site and context analysis and a logical design which arises from the understanding of these.

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. Subject to the above changes DAS's are certainly beneficial for certain types of development (see above).

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.

The need to transparently monitor design standards/ quality of design and strategic sustainability alongside the current regime of target and deadline based performance indicators as this is a key issue that is currently placing 'delivery' above 'legacy'. This requires the WG to provide clear and consistent measures of design quality assessment across Wales.

How to respond

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

E-mail	Post
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]	Please complete the consultation form and send it to: Design Consultation Planning Policy Branch Planning Division Welsh Government Cathays Park Cardiff CF10 3NQ

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

CONSULTATION RESPONSE FORM

Design in the Planning Process (Consultation)

Date: 6 October 2014 - 16 January 2015

Name	Lucie Taylor	
Organisation	Federation of City Farms and Community Gardens	
Address	46 Ninian Park Road Cardiff CF11 6JA	
E-mail address	lucie@communitylandadvice.org.uk	
Telephone	02921 960966	
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)	<input checked="" 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

In the context that Welsh Government's objectives and guidance need to meet the needs of our population, community growing has increased exponentially in Wales in the last five years. There is now a clear evidence base of good practice in Wales that should be replicated. The Federation of City Farms and Community Gardens (FCFCG) are well placed to provide information on the different models of community growing including, but not limited to, allotments, community gardens, community orchards, public edible planting, Community Supported Agriculture. The FCFCG Service Community Land Advisory Service Cymru is well placed to identify appropriate land for new sites and land on prospective housing or employment sites that could incorporate various forms of community growing or work place allotments that might be suitable.

Good design seeks to sustain and enhance local character, ensures attractive and safe public spaces with natural surveillance so that community safety is achieved, ensures efficient use and protection of natural resources, enhances biodiversity and designs for change (environmental sustainability), provides a sustainable means of travel (movement) and ensures ease of access for all.

A more holistic approach to resources (such as land, water, soil, plants and biodiversity) should be made so that incoming users of developments feel closer to nature and to the resources that we so heavily rely on. . Currently new development schemes do not achieve environmental sustainability as best they could and to the benefit of all. Green infrastructure is an essential component of all new developments and making community growing spaces part of new development schemes (housing and employment) could be essential enablers of environmental sustainability.

More efficient use of planning tools such as master plans and planning briefs is welcomed and a more strategic approach to on site resources would be beneficial. For instance if a development is green field (especially on high grade agricultural land) then a strong 'growing' character should be present in the design of the scheme. Likewise, in urban areas where there is a deficiency in accessible natural green space community growing spaces could be built into schemes to help improve the green structure of an area.

A starting point of using community growing spaces to improve environmental sustainability would, in turn, improve the character and community safety of an area. Raising the awareness of users of a new development in this way will increase their sense of social responsibility

and could also encourage use of more sustainable modes of travel.

FCFCG is aware of numerous examples where management of growing spaces has been passed on after the initial set up phase by the landowner (be it local authority, community or town council or private landowner) This is a successful model that could easily be replicated for developers of new housing and employment schemes if the tools were defined and made consistent. This would overcome the issues that community groups have with the huge challenges of setting up a new growing space for themselves. FCFCG is well placed to help provide growing spaces on new development schemes.

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

Q2	Further Comments
<p>Welsh Government needs to lead from the front on design especially from an environmental sustainability perspective. Developers will always seek to achieve the most financially, out of a site and that usually involves increasing density or floor space of the development at the expense of design and layout of the scheme. Local authorities need help in instilling a more positive approach upon developers.</p> <p>There are already developers that seek to achieve higher than average design quality but the general thrust is to do things with minimal financial outlay. Providing guidance on ways to improve site design can only help to provide better developments.</p> <p>The guidance needs to point to methods and examples of improving design quality and community growing spaces need to be recognised as such in the guidance.</p> <p>We would recommend the following examples of good practice in terms of Green infrastructure planning where food growing spaces feature;</p> <ul style="list-style-type: none"> DEFRA / Natural England / EFTEC Green Infrastructure's contribution to economic growth: a review http://randd.defra.gov.uk/Default.aspx?Menu=Menu&Module=More&Location=Non e&Completed=0&ProjectID=19056 	

- Monmouthshire Draft Green Infrastructure SPG
<http://www.monmouthshire.gov.uk/app/uploads/2014/08/2b-Green-Infrastructure-SPG.pdf>

There are various examples of good practice in the use of development land for community growing (see below). FCFCG would be happy to provide further information if required. One very good example is the Victoria Business Improvement District in London, [Green infrastructure audit](#) which recognises food growing spaces as being of particular value to the local economy. This also led to a number of green maps/ guides being produced. Several local authorities have adopted or created policies supporting and promoting the use of land for community growing. These include Cardiff, Swansea, Wrexham, Monmouthshire, Newport and Powys. Cardiff Council has a policy in their forthcoming Local Development Plan (LDP) which asks developers to provide new growing spaces on developments over 46 units. The LDP examination is ongoing at present. The session to discuss Policy C5 will be held on 13th February 2015.

Persimmon Homes have a current planning application with Cardiff Council where allotments and a community orchard have featured strongly in the master planning phase. We would like to refer to this as a good example but we are aware of other schemes and FCFCG can provide further examples upon request.

The details are as follows –

14/02556/MJR | FIRST PHASE OF ST EDERYN'S VILLAGE TO INCLUDE 396 DWELLINGS, VILLAGE CENTRE (COMPRISING RETAIL, EMPLOYMENT AND COMMUNITY USES), PLAY AREA, ALLOTMENTS, COMMUNITY ORCHARD AND PHASE 1 OF THE RIVERSIDE PARK. ALL WITH ASSOCIATED LANDSCAPING, LAND RE-PROFILING, ACCESS AND HIGHWAY WORKS. | PHASE 1, LAND EAST OF CHURCH ROAD AND NORTH AND SOUTH OF, BRIDGE ROAD, OLD ST MELLONS

We would support the creation of a Green Infrastructure TAN and that it should include the principles of good design and as a way to improve the environmental sustainability and character of a site. We would also urge the inclusion of community growing spaces. Guidance for developers, local authorities and communities should be provided and written for each specific audience. To ensure that local authorities are supported in developing this specific area of work, it is important that guidance is drafted with the third sector in mind, outlining what roles they could perform. FCFCG is well positioned to help with many areas of this work e.g compiling guidance, and we are also aware of Member organisations and groups that could help with management of spaces or present a more hands on role in set up of such spaces. We are aware of developers and landowners who are looking for help in delivery and management of green spaces as result of planning conditions imposed on them (in the wake of decreased local authority budgets), for example, [South Sebastopol Scheme, Torfean.](#)

We would also suggest that conditions should be placed on new developments of both a public or private nature that community grown food must be included. There should be an obligation on developers to benefit the local community and the environment through the delivery of orchards and/or edible planting in new schemes. Where schemes deliver housing or employment provision a threshold should be set where the provision of allotments or community gardens must be included like to the proposed Cardiff LDP Policy C5. Guidelines would be helpful and FCFCG would be happy to explore the creation of this guidance with Welsh Government.

Welsh Government has funded FCFCG to produce a comprehensive guide for setting up a Community Growing Project which will be launched in March 2015. This provides a toolkit for groups wishing to create and manage community growing sites. This will be a valuable resource for groups and landowners which will empower communities to grow. FCFCG would be pleased to work with developers and planning consultants to produce further guidance for providing community growing spaces in new development schemes.

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>Currently there are too few examples of master plans that provide well designed green infrastructure at an early stage. There are many different types of community growing that could be incorporated into well designed green infrastructure. Most of these models are easy to provide and some are low maintenance with high value, for example community orchards. NRW's senior urban advisor has offered particular support for community orchards and for their pollinator attributes.</p>	

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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		

Q1	Further Comments
<p>Yes. Green infrastructure and the potential for community growing spaces are fundamental to the inception of this process. A partnership approach to site analysis is the way forward. Voluntary, private, academic and public sectors should be coming together on this more. This is something the Design Commission for Wales could lead on by holding an event to celebrate examples of good practice in Britain and Europe. The voluntary sector has much to offer in this regard and should be used more effectively through the use of WCVA pre ministerial meetings or contacting organisations direct. Coupled with FCFCG work in this area, we are aware of good practice and guidance from the likes of Wildlife Trusts Wales and Interlink RCT. Natural Resources Wales are, of course, valuable partners in the process of site analysis but it would be beneficial to see more collaboration and pointing to good practice. FCFCG is well placed to provide examples of good practice on how community growing projects have worked in varying types of locations from north facing hillsides to meanwhile use derelict urban sites.</p>	

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 involving council departments are important and Welsh Government must ensure that the dwindling resources and posts with expertise in areas such as ecology, landscape and urban design are boosted. If they are not able to guarantee this then a plan b, which might involve of funding to the voluntary sector, is needed. Planners cannot cover all these areas of expertise on their own and environmental sustainability for sites will be sacrificed as a result. FCFCG is well placed to provide pre application advice on how community growing could be incorporated into new development schemes. We would be happy to do this direct with the private or public sector or in collaboration with both.

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?

FCFCG can provide pointers to informal guidance written by experts as well as guidance written by other departments of Welsh Government and NRW.

Welsh Government has funded the FCFCG organisation to provide a community growing guide and this will be launched in March 2015.

The Minister, Carl Sargeant will be making a statement in January 2015 on the Welsh Government's consultation on increasing access to land for allotments and community growing spaces. Planning Division need to be mindful of speeches and guidance that come out of this forthcoming Green Paper. It will be critical to integrate it with guidance on design. For instance, there is no sense in providing direction on increasing access to land for a particular use if Planning Division is producing design guidance that does not compliment it. This is fundamental to the collaborative nature of the work that should be coming out of Welsh Government.

Q7

Access

	Do you agree that the amendments to the 1APP form will ensure inclusive access issues are considered in development proposals?	
	Yes	
	Neither Yes nor No	
	No	

Q7	Further Comments	

Q8	Access	
What information or other measure would assist local planning authorities assess planning proposals in terms of inclusive access?		

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?		
<p>FCFCG see both the Design Commission and the Planning Advisory Improvement Service as essential components for disseminating best practice and training. The provision of green infrastructure including community growing spaces will be important issues to include. We are well placed to assist with training on community growing spaces and how they can be provided in various locations and in new development schemes.</p>		

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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?	

Please see our response to question 9 above. We would add that the provision of interesting and inspiring examples is always welcomed by planners and that FCFCG is well placed to provide numerous examples of successful community growing spaces throughout Wales and elsewhere.

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	X
	Neither Yes nor No	
	No	

Q11	Further Comments
	There is scope for greater collaboration with the voluntary sector and professional bodies in this area. FCFCG would welcome working more closely on community growing issues and we would point to the CLAS Cymru pilot programmes in this area with the City and County of Swansea and Wrexham County Borough Council. We are also working closely with Cardiff Council and we would be happy to provide evidence of this upon request.

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?

Cardiff Council Local Development Plan asks developers to provide growing spaces on new developments over 46 units. Policy C5 of the Plan will be discussed at the LDP examination in February 2015.

Swansea and Monmouthshire Councils refer to community growing spaces in their residential design guidance and green infrastructure SPGs.

Links to good practice -

Monmouthshire Draft Green Infrastructure SPG

<http://www.monmouthshire.gov.uk/app/uploads/2014/08/2b-Green-Infrastructure-SPG.pdf>

DEFRA / Natural England / EFTEC Green Infrastructure's contribution to economic growth: a review

<http://randd.defra.gov.uk/Default.aspx?Menu=Menu&Module=More&Location=None&Completed=0&ProjectID=19056>

Another very good example is the Victoria Business Improvement District in London, [Green infrastructure audit](#) which recognises food growing spaces as being of particular value to the local economy. This also led to a number of green maps/ guides being produced.

Q13

Design and Access Statements

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

Yes

Neither Yes nor No

No

Q13**Further Comments**

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Q14**Design and Access Statements**

*

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

Q14**Further Comments**

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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.

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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

CONSULTATION RESPONSE FORM

Design in the Planning Process (Consultation)

Date: 6 October 2014 - 16 January 2015

Name	Miss Rachael A. Bust – Chief Planner	
Organisation	The Coal Authority	
Address	200 Lichfield Lane, Berry Hill, Mansfield, Nottinghamshire, NG18 4RG	
E-mail address	planningconsultation@coal.gov.uk	
Telephone	01623 637119	
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	✓
	No	

Q1 Further Comments

The Coal Authority is not involved sufficiently in the design process to be in a position to comment.

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	

Q2 Further Comments

This would aid Local Development Plans and the Development Management Process in assessing this issue consistently across Wales.

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		
No		

Q3	Further Comments
The Coal Authority has seen some site specific masterplans, which do help to address locally distinctive issues.	

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		✓
Neither Yes nor No		
No		

Q4	Further Comments
This would aid the plan making and the Development Management Process in assessing this issue consistently across Wales.	

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 Coal Authority is not involved sufficiently in the design process to be in a position to comment.

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?

The Coal Authority is not involved sufficiently in the design process to be in a position to 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

Q7

Further Comments

No further comment.

Q8

Access

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

The Coal Authority is not sufficiently knowledgeable in this area to be in a position to 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?

The Coal Authority is not involved sufficiently in the design process to be in a position to comment.

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?

The Coal Authority is not involved sufficiently in the design process to be in a position to comment.

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		✓
No		

Q11 Further Comments

The Coal Authority is not involved sufficiently in the design process to be in a position to comment.

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 Coal Authority is not involved sufficiently in the design process to be in a position to comment.

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	
	No	✓

Q13 Further Comments

In general terms the use of Design and Access Statements in both Wales and England does not seem to have added value to the planning system in the way envisaged. We have noted that agents just recycle the same general DAS for different proposals.

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	

Q14 Further Comments

In general terms the use of Design and Access Statements in both Wales and England does not seem to have added value to the planning system in the way envisaged.

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.

We have no further comments to make.

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:</p> <p>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

CONSULTATION RESPONSE FORM

Design in the Planning Process (Consultation)

Date: 6 October 2014 - 16 January 2015

Name	Sarah Edwards	
Organisation	Persimmon Homes West Wales	
Address	Dragon House, Parc y Ddraig, Penllergaer Business Park, Penllergaer, Swansea, SA4 9HJ	
E-mail address	sarah.edwards@persimmonhomes.com	
Telephone	01792 229800	
Type <i>(please select one from the following)</i>	Business	<input checked="" 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)	<input type="checkbox"/>
	Other (other groups not listed above)	<input type="checkbox"/>

Q1	Design Quality	
	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>Movement – Yes but through the submission a Transport Statement/Assessment and Travel Plan</p> <p>Access – No because this is more a Building Regs requirement than a planning one</p> <p>Character – Yes especially during pre-application discussions with Urban Design & Highway Officers.</p> <p>Community Safety – Yes during pre-application discussions.</p> <p>Environmental Sustainability – Yes and no because Code for Sustainable Homes is no longer a planning issue but planting and biodiversity are and are dealt with through the submission of landscape strategies and detailed planting and management plans</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>What is classed as good design is subjective in that what is acceptable in Swansea in an urban city centre location will not be in rural Pembrokeshire so a 'one size fits all' national design policy would be difficult to enforce and might even be detrimental as there would be limited opportunities to design in accordance with existing local vernacular</p>

Q3	Supplementary Planning Guidance	
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		X
Neither Yes nor No		
No		

Q3	Further Comments
<p>All masterplans, area plans and site specific plans, however, should be indicative only in that the amount and use class of development is identified but the exact location within a master plan for a certain use class is capable of being amended at the detailed planning stage.</p> <p>Areas of good practice that Persimmon West Wales have been involved in include Coed Darcy in Neath Port Talbot, Parc Derwen in Bridgend, Carmarthen West and SA1 in Swansea.</p>	

Q4	Supplementary Planning Guidance	
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		
Neither Yes nor No		
No		X

Q4	Further Comments
A national approach would be difficult to implement and deliver on a local scale as what is classed as well designed in SA1 in Swansea would not be classed as well designed in Carmarthen West.	

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?

It must include comments from all LA departments not just planning, i.e urban design, highways, ecology, drainage etc

Bridgend currently charge for pre-app but you get attendance at a meeting of all officers or comments from those not able to make it as well as a written confirmation of the LPA's position regarding the proposed development that was tabled at the pre-application meeting

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?

None

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

Inclusive access falls under building regs and so is dealt with through NHBC or LABC requirements for volume housebuilders

Q8

Access

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

A question on the 1APP form asking if the site has been registered with NHBC or LABC? If so, provide a copy of the Initial Notice/Reference

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?

Inclusive access is a building regs issue not a planning one so not sure that it can.

Also, good design shouldn't be mainstreamed as a national policy won't work due to the varied architectural vernacular of Wales.

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?

The ability for them to recognise that in terms of good design, due to costs, they will not get everything they ask for and the need to be more realistic with regards to what comments will be accommodated by the developer as the developer has to consider and ensure that the commercial viability of the proposed development isn't compromised so much that a scheme becomes unviable.

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

Where the impact of a development will impact on a neighbouring authority.

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?

Good design has been achieved on two Persimmon schemes at Coed Darcy in Neath Port Talbot which has a Town Code and at Parc Derwen in Bridgend which has a Masterplan.

Q13	Design and Access Statements	X
Are there any benefits in retaining the requirement for Design and Access Statements for particular applications?		
Yes		X
Neither Yes nor No		
No		

Q13 Further Comments
 However, it should be simplified to a Design Statement as a lot of the information contained within it can be found on the plans submitted in support of an application, e.g. Boundary Treatments, External Works and Materials Layouts which will detail the fences and walls around gardens, road and footway finishes and which bricks and roof tiles will be used if planning permission is granted. Also, movement is dealt with in the Transport Statement or Transport Assessment and Travel Plan and inclusive access is dealt with by Building Regs.

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		X
Neither Yes nor No		
No		

Q14 Further Comments
 A lot of the information contained with them can be found elsewhere in the planning application documents and so it can be a box ticking exercise sometimes to get an application validated.
 Furthermore, we have, in the past, been asked for a Design and Access Statement when submitting a Section 73 Application to vary a condition to extend the time period for submitting a reserved matters application even though there is no impact on movement, access, character, community safety or environmental sustainability just because there is a tick box that won't let the LPA register the application without one.

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.

Character should be retained in the Design Statement but it would make more sense to include it as a chapter in the Planning Statement so it becomes a Planning and Design Statement as community safety is addressed at pre-application, movement is done in the Transport Statement, Transport Assessment and Travel Plan and Access and Environmental Sustainability are dealt with through Building Regs and Landscape Strategies, Planting Plans and Management Plans.

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:</p> <p>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

CONSULTATION RESPONSE FORM

Design in the Planning Process (Consultation)

Date: 6 October 2014 - 16 January 2015

Name	Mr Ross Anthony	
Organisation	The Theatres Trust	
Address	22 Charing Cross Road, London WC2H 0QL	
E-mail address	planning@theatrestrust.org.uk	
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 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	
	No	

Q1	Further Comments

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	

Q2	Further Comments

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	
	No	

Q3	Further Comments

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

05

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?

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06

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?

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07

Access

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

*

Yes

Neither Yes nor No

No

08

Further Comments

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Q8

Access

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

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?

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?

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		
No		

Q11	Further Comments

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?		

Q13	Design and Access Statements	X
Are there any benefits in retaining the requirement for Design and Access Statements for particular applications?		
Yes		X
Neither Yes nor No		
No		

Q13 Further Comments

Particularly for major development, the onus should be with the applicant to demonstrate their proposal meets design guidelines, rather than relying on the local planning authority to make that judgement. Also the public, consultees or committee members are not necessarily part of the pre application/ application discussions/ negotiations, and the D&A statement is useful for these parties.

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

As noted above, the document is important for the public, committee members, etc to understand the proposal.

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

CONSULTATION RESPONSE FORM

Design in the Planning Process (Consultation)

Date: 6 October 2014 - 16 January 2015

Name	Rhian Stangroom-Teel	
Organisation	Leonard Cheshire Disability	
Address	14 Trem Mapgoll, Barry Vale of Glamorgan CF63 1HD	
E-mail address	Rhian.stangroom-teel@leonardcheshire.org	
Telephone	07815601445	
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)	<input checked="" 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>Specifically, Leonard Cheshire Disability cannot say that the planning system is currently delivering the good design objective of ‘Access.’</p> <p>We make this comment because we know there to be a growing need for disabled-friendly homes in Wales. We know that the majority of new builds are not being built to accommodate common adaptations that homeowners may require as their physical needs and abilities change. We also know that Wales has- within the UK- one of the highest proportions of disabled people amongst its population, which we believe highlights the value of it actively leading the UK’s nations in addressing this issue.</p> <p>As things currently stand, most new homes cannot be cheaply adapted to provide the minimum in accessibility including grab rails and wet rooms, let alone stair lifts or hoists. Critically:</p> <ul style="list-style-type: none"> - Almost three quarters (72%) of people in Wales report that they live in a home without an accessible front door – meaning that of the hundreds of thousands of people who acquire a mobility impairment every year, most will have to move house or risk becoming trapped in their own home; - More than half (54%) of people in Wales say they do not have stairs big enough for a stair-lift to be fitted- meaning that if they become disabled, they will be trapped downstairs stuck washing at their kitchen sink, sleeping in their lounge, and unable to get upstairs to tuck their children into bed; - 22% of disabled households in Wales are currently waiting for an adaptation to be made to their home; and - One in six disabled people in the UK and half of all disabled children are living in housing that isn’t suitable for their needs. <p>Despite this, we understand that many of Wales’ councils have no estimate either of the number of disabled-friendly homes they have already, nor the number they need. Moreover:</p> <ul style="list-style-type: none"> - No councils in Wales have analysed the additional costs of inadequate housing to health and social care; and - Over a third (36%) of Welsh councils either do not have a housing plan, or their housing plans make no reference to disability at all. <p>We are concerned that these issues will not be addressed by the Welsh Government’s current proposals. Indeed, we are conscious that the planned repeal of the need for Design and Access Statements (DAS) may endanger the current standards of accessibility.</p>

At the very least the DAS currently:

- Forces developers to think about access needs;
- Allows access groups to be part of the planning process; and
- Promotes good communication about the accessibility of particular developments.

The question for us is not therefore whether or not the DAS should cease to be a mandatory requirement for all, but rather how whatever system is put in place ensures that access for disabled people is uppermost in the minds of all property developers, construction firms and planning decision makers.

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

Q2	Further Comments
<p>We believe that the implementation of a national development management policy on design would be an excellent way to deliver the necessary design standards to ensure that Wales's homes are disabled-friendly.</p> <p>In London, the Greater London Authority (and the Mayor) have successfully used the London Plan to promote accessible homes across the capital. The London Plan requires all new homes to be built to Lifetime Homes standard, and 10% of new homes to be fully wheelchair accessible – making London's homes the most disabled-friendly in the country.</p> <p>The Welsh Government should seize this opportunity to become a leader in accessible design, and effectively increase the quality of homes across Wales in one in easy step.</p>	

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	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

Q3 Further Comments

Leonard Cheshire Disability does not have a comment on this matter at the current time.

Q4	Supplementary Planning Guidance	<input checked="" type="checkbox"/>
	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	<input type="checkbox"/>
	Neither Yes nor No	<input checked="" type="checkbox"/>
	No	<input type="checkbox"/>

Q4 Further Comments

Leonard Cheshire Disability does not have a comment on this matter at the current time.

Q5	Front Loading / Pre-applications	<input type="checkbox"/>
	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?	
<p>We recognise that the Welsh Government has made some positive steps towards delivering the disabled-friendly homes that people in Wales need. All new social housing is built to Welsh Housing Quality Standards (WHQS), and all social landlords are required to upgrade their existing stock to WHQS by 2020. However, with a couple of small amendments, WHQS could be made even more robust, and better able to meet the needs of homeowners throughout their lifetime. As such, we recommend that WHQS be updated to include all elements covered in the Lifetime Homes design.</p> <p>However, social housing only makes up 17% of all Welsh housing. That means that for every six new homes being built, only one is being built to full WHQS and therefore guaranteed to be disabled-friendly. Further, the Welsh Government has not set a minimum percentage of new homes to be built to fully wheelchair accessible standards and, as such, the provision of social and private wheelchair accessible housing varies considerably throughout Wales. Anecdotally we know that fully wheelchair accessible properties are very hard to come by.</p>		

As such, we would recommend that pre-application discussions should ensure that all large developments (of at least 10 houses), whether by local councils, private or social housing developers) being built to WHQS/LTHs, with at least 10% of such developments being built to full wheelchair accessibility standards.

Q6	Planning Applications	
<p>Other than further training or additional practice guidance what additional tools would assist you in assessing the quality of design in planning proposals?</p>		
<p>Leonard Cheshire Disability does not have a comment on this matter at the current time.</p>		

Q7	Access	X
<p>Do you agree that the amendments to the 1APP form will ensure inclusive access issues are considered in development proposals?</p>		
Yes		
Neither Yes nor No		X
No		

Q7	Further Comments	
<p>We are concerned by two issues associated with the Welsh Government’s proposal that the DAS be replaced with an access question in the 1APP form:</p> <ul style="list-style-type: none"> - Firstly, the 1APP question could be removed at a later date, without the need for additional primary legislation; and - Secondly, the new question does not strike us as being an effective means for promoting good communication – and it may not effectively involve local access groups. <p>To resolve these two concerns we would recommend that:</p> <ul style="list-style-type: none"> - The question in the 1APP should have a statutory footing, and - Developers be required to engage with local access groups if their answer to the 1APP question indicates that a development will not be as accessible as it could be. 		

Q8	Access	
<p>What information or other measure would assist local planning authorities assess planning proposals in terms of inclusive access?</p>		
<p>As noted above, we believe that local planning authorities should assess whether all new</p>		

builds including larger developments (i.e. of at least 10 houses) are:

- Designed to Lifetime Homes standard; and
- Include at least 10% fully wheelchair accessible homes

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?

Leonard Cheshire Disability does not have a comment on this matter at the current time.

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?

Leonard Cheshire Disability believes that design skills could be improved following consultation with disabled groups so that local authority officers had a clearer idea of the issues faced by those with mobility needs.

For example as part of officers training they could spend a period of time with an individual with mobility needs and experience first-hand the difficulties and challenges faced negotiating a high street, park or housing development.

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	x
Neither Yes nor No	
No	

Q11

Further Comments

As with question 10 we believe that much could be gained by local planning authorities working with disability groups and experiencing first-hand the difficulties faced as part of their training.

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?

Leonard Cheshire Disability does not have a comment on this matter at the current time.

Q13

Design and Access Statements

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

Yes

Neither Yes nor No

No

X

X

Q13

Further Comments

As noted above, we believe that DAS statements:

- Force developers to think about access needs;
- Allow access groups to be part of the planning process; and
- Promote good communication about the accessibility of particular developments.

As such, while we do not have a strong view on whether the requirement for DAS statements should be retained per se, we believe that if it is discontinued it is vital that these outcomes are retained.

More broadly it is imperative that the collective effect of changes to the system are such that they maximise (rather than compromise) the likelihood that access for disabled people is uppermost in the minds of all property developers, construction firms and planning decision makers.

Q14

Design and Access Statements

Should the mandatory requirement for Design and Access Statements be removed from secondary legislation? Give reasons for your answer.

Yes

X

Neither Yes nor No	X
No	

Q14 Further Comments

As noted above, Leonard Cheshire Disability does not have a strong view on whether or not the DAS should cease to be a mandatory requirement for all.

The question for us is how whatever system is put in the place of DAS's ensures that making access for disabled people is uppermost in the minds of all planners, construction companies and key decision makers.

Based on the current proposals, we believe that if the mandatory requirement for DAS is removed from secondary legislation, it is vital that the access question in the 1APP form should have a statutory footing, and that obligations to meet with local access groups should be placed on all developers.

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.

In our comments, we have focussed on the need for the planning system to deliver disabled-friendly homes. To put this in a broader context, we would like to make three points:

- Falls are one of the most common reasons disabled and older people are admitted to hospital. But they could be dramatically reduced by providing more disabled-friendly features such as stair lifts, grab rails and level access to buildings. If more people who needed disabled-friendly housing had it, the NHS would save millions of pounds every year. The cost to the NHS of just one hip-fracture – perhaps caused by someone falling down the stairs – is estimated as £28,000. In comparison, it costs only £1,100 extra to build a new home to Lifetime Homes standard.
- A lack of suitable disabled housing is one of the leading factors in why disabled people move into residential care, which has significant cost implications for individuals and local councils.
- Disabled-friendly homes are, by design, cheaper and easier to adapt than any other homes:
 - o Installing a stair lift in a Lifetime Home can cost as little as £2,500, but if the wall by the stairs is not strong enough, the cost of replacing or reinforcing the wall could be five or ten times that.
 - o If a bathroom is big enough for a wheelchair to fit into by design (as they are in Lifetime Homes), the only cost to adapt the home may be around £300 to install

grab bars. Whereas, if the doorway needs to be widened and the wall needs to be strengthened, costs could easily be 30 times higher.

Finally, thank you for the opportunity to respond to this consultation. The statistics included in our response are set out and referenced in the Welsh Briefing of our Home Truths report, which is attached below for possible interest.



Welsh English
briefing_3.pdf

If you would like any further information about any of the issues we have highlighted in our response, we would be very happy to provide further detail.

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

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	
	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	
	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

X

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

Yes

Neither Yes nor No

No

X

Q7

Further Comments

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.

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

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

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

CONSULTATION RESPONSE FORM

Design in the Planning Process (Consultation)

Date: 6 October 2014 - 16 January 2015

Name	Rhidian Clement	
Organisation	Dwr Cymru\Welsh Water	
Address	Dwr Cymru Welsh Water Developer Services PO Box 3146 Linea Fortran Road Cardiff CF30 0EH	
E-mail address	Developer.Services@dwrwymru.com	
Telephone	0800 9172652	
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)	<input type="checkbox"/>
	Other (other groups not listed above)	X

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

Q1	Further Comments	
	<p>Dŵr Cymru welcomes the inclusion of environmental sustainability within the five objectives of good design. Well-designed green infrastructure, including sustainable drainage, has an important role to play in the delivery of that objective.</p> <p>The Welsh Government continues to be supportive of Dŵr Cymru’s commitment to sustainable drainage systems - or “SuDS”. This is because the Welsh Government recognises that properly designed and maintained SuDS deliver;</p> <ul style="list-style-type: none"> - significantly reduced risk of flooding; - greater resilience to the onset of climate change; - reduced energy use and thus less greenhouse gas emissions; - potential benefits for the environment and associated biodiversity; and - enhancements to local amenity value, with the quality of life benefits that brings. <p>In view of these wider, long term benefits, Dŵr Cymru believes that the SuDS approach to surface water management should be a routine part of development design from project inception, rather than an afterthought considered when project designs are well advanced.</p>	

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

Q2 Further Comments

DCWW would support a national development management policy on design. From our perspective, a national policy that includes reference to drainage design would be beneficial to help guide how foul water, surface water and land drainage are dealt with, including the specific requirements of SuDS solutions.

Q3 Supplementary Planning Guidance

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

No

Q3 Further Comments

We believe that area and site specific plans are key to positively planning for key developments. From a DCWW point of view, they allow the specific requirements of the development with regard to drainage, water supply and sewerage to be identified, and also can identify any existing constraints such as easement widths for watermains/sewers.

Examples of good practice include City & County of Swansea's vision and masterplan for North Pontardulais.

Q4 Supplementary Planning Guidance

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

√

Neither Yes nor No

No

Q4 Further Comments

Yes. We believe that practice guidance on the process of site analysis would enable issues with regard to drainage to be at the forefront of a developer's thoughts when planning a site, rather than an afterthought as it currently can be.

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?	

To ensure "join-up" between Welsh Government environmental and planning policies, Dŵr Cymru would like developers, as well as local planning authorities, to be encouraged to consider drainage matters at the earliest opportunity within project design.

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?	
	Yes	
	Neither Yes nor No	√
	No	

Q7	Further Comments	
	No comment	

Q8	Access	
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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?

No comment

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?

In our experience, councillors and planning officers can find it helpful to visit sites where they can view sustainable drainage systems in operation. For example, our flagship scheme at Stebonheath School in Llanelli has proved a particularly useful demonstration site which enables visitors to understand the challenges we face and the pros and cons of potential solutions. Like everyone else, Dŵr Cymru has finite resources available, but we are willing to consider sympathetically requests of this sort from local planning authorities.

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

No

x

√

Q11 Further Comments

No comment

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?

No comment

Q12 Design and Access Statements

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

Yes

Neither Yes nor No

No

x

√

Q13 Further Comments

No comment

Q14 Design and Access Statements

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

No comment

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
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]	Please complete the consultation form and send it to: Design Consultation Planning Policy Branch Planning Division Welsh Government Cathays Park Cardiff CF10 3NQ

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

Planning Aid Wales

Consultation response to 'Design in the Planning Process'

To: planconsultations-a@wales.qsi.gov.uk

Date: 16th January 2015

1. About Planning Aid Wales

1.1 Planning Aid Wales is a not-for-profit charity which is core funded by Welsh Government. We work to help the communities of Wales to understand and engage effectively with the land use planning system.

1.2 Planning Aid Wales provides information, advice and training services to help local communities engage more effectively with planning. We also work with local planning authorities and Welsh Government to encourage more effective community involvement in the planning process.

1.3 When responding to consultations on emerging national planning policy, Planning Aid Wales aims to identify and remove potential barriers which might prevent effective or manageable public involvement in planning. This consultation response is informed by our experience of working with Welsh Access Groups and Disability Fora to prepare the publication 'Access Statement Guidance' (February 2011). Subsequently, we have also provided planning training for access groups across Wales through the Disability Wales 'Way to Go' programme, and worked with Conwy County Borough Council to help improve interaction between the authority's planning team and the local access group.

2. Consultation response

Q1

Design Quality

Is the planning system effectively delivering the five key objectives of good design? Give reasons for your answer.

2.1 No. The planning system is not yet effectively delivering one of the five key objectives of good design (ensuring ease of access for all).

2.2 Well-designed accessible buildings and public spaces are a key element of inclusive living. Planning is one of the few mechanisms which can help achieve integrated inclusive access in the built environment.

2.3 Achieving inclusive access requires a holistic, joined-up approach to design. A statutory requirement for Design and Access Statements, if properly implemented and resourced, helps encourage developers to consider inclusive access from an early stage of scheme preparation.

2.4 Design and Access Statements should be retained as a statutory requirement for the new category of planning applications defined as 'Major Development'. We also see a role for local Access Groups to support planning authorities in their responsibility to deliver accessible new developments.

Q2 Local Development Plans

Do you agree that a national development management policy on design would be beneficial?

2.5 Yes, we agree that a national development management policy on design will be beneficial, but only so long as it gives equal weight to the importance of achieving inclusive access through a systematic and fully integrated design process.

Q3 Supplementary Planning Guidance

Are area and site specific plans, such as masterplans, being used to positively plan for key development? Can you highlight areas of good practice?

2.6 While many access issues are best dealt with at the strategic masterplanning level, there is little evidence to suggest that area and site specific plans are currently being used effectively to improve inclusive accessibility into and around major new development sites. This deficiency could be addressed as part of a future national development management policy on design (see 2.5 above).

Q4 **Supplementary Planning Guidance**

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?

2.7 We would welcome practice guidance aimed at ensuring inclusive access is considered as an integral element of the design process, particularly for larger sites.

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?

2.8 We see the potential for a new approach to achieving inclusive access in new developments, whereby local planning authorities work creatively with local access groups and access professionals to identify and address potential access issues in evolving development schemes.

2.9 Planning Aid Wales has worked with Conwy County Borough Council planners to seek to embed this approach at the local level. That work identified some important areas of knowledge deficit and misunderstanding which training and facilitation helped to rectify.

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?

2.10 In addition to more systematic involvement of disabled people in the early stages of design and planning, there should be mandatory training on disability equality and inclusive access for all those involved in the planning process.

Q7

Access

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

2.11 No. The suggested amendments to the 1APP form alone will not ensure sufficient consideration is given to inclusive access issues. Additional encouragement via policy, guidance and training (see response to question 9 below) will also be required.

Q8

Access

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

2.12 We see the potential for a more systematic approach to achieving inclusive access in new developments, whereby local planning authorities work closely with local access groups and access professionals to identify potential access issues in evolving development schemes.

2.13 Please see our response to consultation Question 9 below for more on this, and for the role PAIS could usefully play.

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?

2.14 Inclusive access and good design should be mainstreamed in the planning system by retaining the requirement for DAS for major developments.

2.15 More could be done to integrate disability and access groups locally in the planning process, and to link up with relevant national organisations to encourage constructive debate around how to improve inclusive accessibility in the built environment. Also, a package of capacity-building training and support for planners and disability groups on inclusive access in the planning system should be provided.

2.16 We suggest that the Planning Advisory and Improvement Service could play an important role in developing local capacities to work in this way, through a package of commissioned research, training and support.

2.17 PAIS should act as a link with disability groups in Wales to put together a portfolio of specific advice and translate it into a language understandable and enforceable through planning and/or via mandatory CPD elements in the professions. For example, Planning Aid Wales has produced an 'Access Statement Guidance' publication and Disability Wales a 'Planning for Inclusive Access toolkit'.

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?

2.18 Please see our response to consultation Question 12 below.

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?

2.19 The initiative commissioned by Conwy Council Borough Council provides a good practice example. In short, the Council invited Planning Aid Wales to provide training to planners on inclusive access, to access groups on how best to engage with the planning system, and finally to both groups jointly on how to work together to achieve better outcomes.

Q13 Design and Access Statements

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

2.20 Yes. The requirement for Design and Access Statements should be retained for the new 'major development' category of planning application.

CONSULTATION RESPONSE FORM

Design in the Planning Process (Consultation)**Date: 6 October 2014 - 16 January 2015**

Name	Ceredigion County Council	
Organisation	Ceredigion County Council	
Address	Cyngor Sir Ceredigion County Council Penmorfa, Aberaeron, Ceredigion SA46 0PA	
E-mail address	ldp@ceredigion.gov.uk	
Telephone	01545572123	
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	X
	Neither Yes nor No	
	No	

Q1	Further Comments
	<p>The five objectives of good design are fundamental to the purpose of the planning system in Wales, if they were not being achieved it would represent a clear failing of the planning system which we do not believe, or recognise, to be the case.</p> <p>It is recognised however that there is always room for improvement and there could be a greater emphasis on the preservation of local historic character and the creation of local distinctiveness in the built form.</p> <p>The focus on the amount of time spent processing and determination of applications as the key performance indicator for Local Planning Authorities could also be seen detrimental to the achievement of good design, and there is a case for finding more qualitative performance indicators (such as high quality developments and negotiated improvements) to measure the performance of planning authorities. The existing emphasis on achieving the 8 week determination target can often act as a constraint on planning officers in negotiating changes where weak designs are proposed but are not sufficiently poorly designed as to warrant a refusal.</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>Planning Policy Wales and TAN 12 already provide firm and clear guidance to LPA's on design, however a concise policy statement could well be useful for planning officer. We would suggest however that such a policy should be <i>general</i> in its nature and purpose and not be too overly prescriptive.</p> <p>A key principle in achieving good design is responsiveness to the setting and the LPA's have an important role in formulating specific design policies that reflect the building traditions and</p>

characteristics of their areas.

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>More work could be done on site specific master-planning for strategic allocated sites. Lack of resources may often account for why master-planning is under-utilised as a technique for ensuring good design. The DCfW could and should have a key role in such master-planning exercises in order that their design expertise can be utilised and site specific examples of the application of design principles can be brought to the fore at an early stage.</p> <p>Master-planning should preferentially be an ‘in-house’ exercise with structured support from the DCfW. In this way the training and experiential benefits of the exercise (including working with DCfW) can be fully realised.</p> <p>One of the benefits of bringing the DCfW into this process is that it enables the valuable input of developers and architects at an early stage.</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	
<p>By their nature every site will have its own specific constraints, opportunities, requirements and dynamics, however a generic approach to analysing design requirements could be useful in ensuring that important opportunities are not missed and to further embed the importance of design in the planning process.</p> <p>It may be helpful if the guidance is broken down into different types of development e.g. greenfield housing; town centre housing/mixed use sites; retail development,</p>		

industrial/employment sites.

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?

On larger and strategic sites this should be related to site specific master-planning and design briefs. The involvement of land-owners and developers in the formulation of these briefs and plans (alongside the LPA and DCfW) should improve outcomes and deliverability.

The Local Highway Authority, as the highways adoption body, also has a key role in ensuring inclusive access is designed into the public realm of development schemes, and delivered.

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?

Training, skills and experience are the key issues as these provide the confidence required to negotiate design changes when appropriate and necessary.

A quarterly bulletin highlighting new examples of exemplary and high quality designs in Wales (and beyond) would be a useful means of information sharing and enable success stories to be shared.

Q7 Access

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

Yes

Neither Yes nor No

No

X

Q7 Further Comments

It should help to flag up access issues, particularly where inclusive access cannot be provided, and if DAS's are no longer to be a requirement.

Changes to the building regulations may be more effective and enforceable.

Q8 Access

What information or other measure would assist local planning

authorities assess planning proposals in terms of inclusive access?

A national training programme co-ordinated by PAIS. The training should involve access groups as they are well placed to provide actual examples of good and bad practice to assist learning.

An online training resource may be another option.

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?

If there is a structured programme of design reviews of large submitted schemes or master-plans/design briefs for key allocated sites, with each authority required to submit one site for consideration, it would enable each planning authority to benefit directly from the input of the DCfW. It would also enable the various proposals and approaches to be collated and shared in order to demonstrate how design principles have been, and can be, creatively applied in a variety of different situations across Wales. The benefits of such a structured approach to the sharing of good practice through the DCfW on new sites, would only increase as those sites are built out. PAIS could be the location for accessing the collated information.

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?

Training budgets for Local Authorities are generally under pressure at the moment, so it would be helpful if design training is made available if it is provided to authorities without or at minimal cost.

Drawing and draughtsmanship skills for site layouts and buildings could be more widely spread amongst Local Authority Planners.

Experience is often the best teacher and if training is structured around real life site specific examples (in a variety of settings) of both well designed and poorly designed schemes then it is likely to provide better outcomes.

Agents, developers, town and community councils all play a role in achieving good sustainable design and the education of which should not be limited to the key professional roles.

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

X

Neither Yes nor No	
No	

Q11 Further Comments

The most important collaboration that planners can have with regards to design is with developers, draughtsmen and architects.

One Ceredigion based architect firm raised the idea of local, county based, design panels on the model of the DCfW. While that idea has not, as yet, been progressed an architect led design workshop for Councillors was arranged and the LPA has also been involved in a small way with a biennial architecture festival that has been established in Aberystwyth.

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?

Swansea Marina and the Carmarthen Market re-development are both good examples of well designed urban renewal projects, which appear to be successful examples of close working between the planning and economic development functions of the Local Authorities involved.

Q13 Design and Access Statements

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

Yes

x

Neither Yes nor No

No

Q13 Further Comments

DAS are useful in assessing design, and the iterative design process which informs and acts as a starting point for further discussion with architects/draughtsmen/planning agents. Admittedly DAS are sometimes treated as a tick box exercise by architects and agents. Formulaic cut and paste statements are not unknown, but these in their own way serve a useful purpose in highlighting weaknesses in the design process and a lack of consideration or attention which is one of the hallmarks of badly designed schemes.

Some architects, more than others, appear to appreciate the opportunity to explain their designs through a DAS. We would argue that DAS should be retained for medium and larger sized

schemes (7 or more dwellings, for example), or developments affecting listed buildings or within conservation areas.

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
Not in its entirety. As stated above, we recognise the benefits of DAS particularly on larger schemes.	
Applicants and architects should think more about their proposals and in compiling the DAS this may flag up design questions or even solutions to their proposals that they may not have thought about.	

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:</p> <p>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
<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>