

# **The Council's draft response to the Government's consultation on draft design and placemaking planning practice guidance**

(The first five questions are regarding information about the respondent)

## **Question 6 Do you agree that the usability and effectiveness of the draft Design and Placemaking PPG has improved?**

The Council is supportive of combining four documents into one centralised location, and the use of more diagrams and less text in comparison to the National Design Guide is a welcome change.

The draft guidance provided builds upon the policies set out in the draft NPPF and the document structure is clear, which benefits usability. Furthermore, the use of overarching themes that are threaded through each of the three parts, is helpful in reinforcing the importance of design and placemaking across all aspects of the planning system.

The draft DPPP has simplified the ten characteristics outlined in the National Design Guide, streamlining this into seven principles for well-designed places. Whilst the ten characteristics have been streamlined, the ideas that informed these are often embedded throughout the seven principles, ensuring their consideration across all facets of a proposal. For example, 'Lifespan' is no longer a principle, but maintenance and stewardship are addressed across each of the seven new principles, which the Council is supportive of.

The draft guidance is successful in clearly defining what an effective design process should entail, which is beneficial, both for developers to know what is expected of them, and for decision makers to know what to look for in assessing proposals – removing ambiguities from the design process. It should be emphasised that this guidance as provided is just guidance, and that the Council is supportive of other design processes that are appropriate to relevant contexts.

## **Question 7 Are there any aspects where clarity, accessibility, or practical application could be improved to better support design and placemaking outcomes?**

The document is unnecessarily lengthy and, at times, repetitive. Whilst the National Design Guide used checkboxes at the end of each chapter, these have been omitted from the draft guidance, which is considered an oversight as these were useful in summarising key points and actions to follow. Similarly, unlike the National Design Guide, the draft Design and Placemaking PPG does not provide commentary on why the example projects are considered good/best practice, which is an oversight as, without explanation, it is unclear as to what should be drawn from these examples.

This can assist developers and their design teams, and decisionmakers when determining applications.

Whilst some hyperlinks are provided in the document, the PDF version of the draft guidance document does not allow users to easily jump between sections that are highlighted within block colours throughout, such as 'test and develop: design policies' and 'making decisions about design' that link to guidance elsewhere in the document. This must be addressed to improve both accessibility and usability, particularly given the length of the document.

The Council would support the inclusion of more case studies, diagrams, or worked examples to illustrate how the principles can be applied in a range of contexts, rather than the urban contexts that the guidance appears skewed towards. This should include smaller-scale developments, brownfield sites, rural settings and more constrained urban and suburban locations.

As drafted, the guidance focuses on urban contexts and those whereby higher density development will be prevalent – failing to provide commentary on locations where achieving increased densities is not possible and/or deemed appropriate due to the setting. Shifting from maximising densities towards optimising development across different contexts would make the guidance more useful in providing tangible design outcomes that are appropriate to context rather than remaining largely aspirational.

As an example, guidance related to town centres focuses on promoting Secured by Design principles (SbD) and designing for terrorism prevention. Whilst this may be valid for denser and busier settings, it is likely to have less relevance within smaller, more suburban and rural high streets with lower population numbers, yet the guidance fails to make allowances for these different contexts, which should be addressed.

Furthermore, the guidance repeatedly promotes the use of SbD guidance, which can conflict with good urban design and placemaking principles. Whilst both policy and guidance encourage social interaction, SbD principles can often conflict with this objective, greater emphasis should therefore be placed on the principles of creating well-designed places that promote safety instead, such as passive surveillance and maintenance and upkeep.

The guidance must be explicit in stating the need to understand the impact of a development on the local environment at an early stage, in terms of both the physical environment and impact upon those who live, work and use the area. For example, considering noise and air pollution caused by construction, road closures to facilitate development, potential negative effects on biodiversity and ecological habitats and the impact of traffic-induced vibrations on existing buildings and their foundations.

Finally, greater clarity around expectations for design quality in relation to viability considerations and how these should be balanced in practice, would assist local planning authorities in decision-making and help reduce uncertainty for applicants.

**Question 8 Do you agree that the principles set out in the draft Design and Placemaking PPG adequately address the needs and requirements of traveller sites?**

The Council broadly agrees that the principles set out in the draft DPPP provide a helpful framework for addressing the needs and requirements of Traveller sites through the emphasis on good design, inclusivity, health and wellbeing, safety, and integration with surrounding communities.

However, the Council considers that the guidance would benefit from more explicit reference to the specific design opportunities and constraints that can arise from the functional needs of Traveller sites. Traveller sites have distinct design and placemaking considerations that are not explicitly addressed in the draft guidance as drafted, such as plot size and configuration, access and turning space for larger vehicles, appropriate levels of privacy, boundary treatments, and the provision of on-site amenity facilities.

The guidance could be strengthened by including clear and specific guidance and/or examples demonstrating how the overarching principles may be applied in practice to Traveller sites, particularly in urban and suburban contexts such as Bexley.

**Question 9 What additional considerations or clarifications might be necessary to ensure planning practice guidance supports inclusive and culturally appropriate design and placemaking?**

The Council considers that the draft guidance would benefit from further clarification on how inclusive and culturally appropriate design principles should be applied in practice across a diverse range of communities. While the guidance more generally emphasises inclusivity and equality, illustrative examples of what is meant should be included in the guidance to ensure these principles are meaningfully embedded in plan-making and decision-taking.

Guidance should recognise that different demographic and cultural groups may have different needs, and that inclusive design is unlikely to always create a single space for all groups – such as Traveller communities, faith groups, older people, and disabled residents – but diverse places that can cater to different needs should be incorporated. This should include more explicit reference to how cultural practices and family structures may influence site layouts, dwelling design, public realm, and shared spaces.

The Council would welcome clarification on expectations around early and ongoing community engagement, particularly where proposals affect groups with specific cultural or accessibility needs. The draft guidance places more emphasis on

engagement, which is welcomed, however it fails to define what constitutes 'meaningful engagement.' Guidance on proportionate, inclusive engagement methods would help ensure that diverse voices are heard and that design outcomes respond effectively to local circumstances. Having this defined in national guidance would strengthen the Council's position in ensuring effective engagement and consultation strategies are devised and implemented by applicants, including ongoing engagement during construction phases, particularly for larger and multi-phase schemes.

The inclusion of more practical examples and/or case studies demonstrating culturally sensitive design in different settings, including across urban, suburban and rural contexts, would improve understanding and consistency in application. This would be particularly helpful in addressing how inclusive design principles can be balanced with other planning considerations such as density, amenity, and viability.

**Question 10 Do you agree that tools, such as model design codes, could speed up the preparation of local design codes?**

The model design codes could prove useful as a starting reference for local authorities undertaking local design code production – largely with regards to structuring a design code. That notwithstanding, local design codes require a level of specificity that must evolve from understanding a place using a local evidence base and engagement with local stakeholders. It is therefore imperative that where model design codes are provided, it is emphasised that these should be used as frameworks, rather than as the complete solution to design coding.