

DESIGN WEST

Questions on Proposed reforms to the National Planning Policy Framework and other changes to the planning system.

12: Making effective use of land

122) Do you agree with the minimum density requirements set out within policy L3?

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly agree

a) Please provide your reasons, particularly if you disagree.

Minimum densities in well-located development sites are welcome. However, there should be a clear emphasis on high-quality placemaking and appropriate green space provision to support these developments. For clarity, a distinction should be made between Gross and Net Density.

14: Achieving well-designed places

146) Do you agree that policy DP1 provides sufficient clarity on how development plans should deliver high quality design and placemaking outcomes? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly agree.

a) Please provide your reasons, particularly if you disagree.

It is encouraging that Design Review has been included with renewed emphasis in the NPPF. However, we would further highlight the benefits and value of Design Review in supporting both planning policy and the delivery of well-designed, successful places.

In response to part 1, (a). we would highlight the value of Design Review for plan-making purposes, alongside development management, and its use in developing Spatial Development Strategies (SDS) and Local Plans.

We would also encourage the inclusion of Design Review alongside the other design tools mentioned in the policy DP1, part 1, (b). as this would be a missed opportunity to support delivery of successful design and placemaking.

147) Do you agree with the approach to design tools set out in policy DP2? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly agree.

a) Please provide your reasons, particularly if you disagree.

We agree with the principle of Policy DP2. However, it should be amended to include specific reference to Design Review, both as a design tool in its own right and as a facilitator supporting the effective use of design tools.

148) Do you agree policy DP3 clearly set out principles for development proposals to respond to their context and create well-designed places? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

The principles set out in the draft NPPF are stronger and more clearly defined than previously, which is welcomed. However, they would be more robust if explicitly linked to relevant UN Sustainable Development Goals, in particular (but not exclusively):

Goal 3: Ensure healthy lives and promote well-being for all at all ages

Goal 5: Achieve gender equality and empower all women and girls

Goal 11: Make cities and human settlements inclusive, safe, resilient and sustainable

Light is noticeably absent from the list of key principles for well-designed places, despite being crucial to creating successful 24-hour places. Lighting plays a major role in shaping the night-time character of a place and is fundamental to how places are perceived and navigated after dark. Light should be included as a design principle in Policy DP3, with reference to its influence on the identity, safety, inclusivity, and legibility.

Additional clarity and strength should be provided in Part 2 of Policy DP3 to require that poor-quality design to be refused, empowering Local Authorities to feel confident in refusing schemes that do not meet design quality standards.

149) Do you agree with the proposed approach to using design review and other design processes in policy DP4? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly agree.

We strongly support the consideration of design quality through the evolution of development proposals, particularly at early stages in line with pre-application engagement.

We also strongly support local planning authorities having access to Design Review, encouraging its use and taking their outcomes into account.

a) If not, what else would help secure better design and placemaking outcomes?

Design West encourage stronger wording and further weight to be afforded to Design Review than the current phrasing: (“encourage appropriate use of Design Review”) in policy DP4, part 2. (a).

As noted in response to Question 146, design quality should be considered during the preparation of local plan policy and site allocations as well as delivery.

Policy DP4, part 2, paragraph (c). is also welcomed. However, additional weight should be afforded to securing continuity in design quality from Outline to Reserved Matters applications.

We would encourage the inclusion of Design Review within planning validation lists, clarifying thresholds for Design Review at pre-application stage. This would ensure earlier engagement, which, as referenced in the Design and Placemaking PPG is very beneficial to Design Review and leads to better design outcomes.

Annex C: Reforming site thresholds

222) Do you agree with the proposal to extend the Permission in Principle application route to medium development? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly disagree.

a) Please provide your reasons, particularly if you disagree

Design West has major concerns with the proposed medium development threshold and expansion of the Permission in Principle (PiP) pathway to planning consent. Under current proposals, there would be no assurance of design quality for developments of up to 49 dwellings, which represents a significant number of homes.

Strong policy wording should therefore require PiP schemes to demonstrate best practice design principles, in line with the Design Process guidance set out in policy DP4. This is particularly important for rural developments.

223) Do you have views about whether there should be changes to the regulatory procedures for these applications, including whether there should be a requirement for a short planning statement?

We would strongly encourage exploring a requirement to monitor and guarantee the design quality of development before permission is granted. Under the draft proposals, there is a risk that medium and small sites delivered through the PiP route could result in developments of poor design quality, as there are currently no clear design requirements that must be met.

Response: Design & Placemaking PPG

Alongside our response to the NPPF, Design West welcomes the proposed updates to the Design & Placemaking PPG.

Design West strongly supports Paragraph 177, which frames the importance of design quality within the planning process. As a centre of excellence for design & placemaking for the South West, we have seen firsthand how high-quality design is crucial when planning for sustainable development (in line with the UN Sustainable Development Goals) and for the delivery of successful places.

We agree that the effectiveness of the draft Design and Placemaking PPG has improved, particularly through its beneficial focus on design tools and engagement throughout a project's lifetime. However, reference to Design Review should be strengthened in the following areas:

Defining Quality Design

The term 'Design Quality' should be linked to a recognised standard in order to establish a consistent and universal definition for all actors within the planning system. This would ensure greater clarity in the interpretation of both the PPG and NPPF.

Alignment with NPPF

Whilst the proposed changes to the PPG and its aspirations to delivering high-quality design are strongly supported, its relationship with the NPPF should be more clearly aligned. This would help balance the importance of design quality with the drive to incentivised housing delivery and policy objectives.

Design quality should be recognised as intrinsic to sustainable development, rather than as a separate or competing consideration.

Early Engagement

We particularly welcome reference to early and repeated engagement for schemes coming to Design Review, as outlined in paragraphs 194, 198, and 260.

Early engagement is essential to providing meaningful influence on schemes and developments, as can be observed in the Cost – Influence or 'Macleamy' Curve (Link: <https://www.danieldavis.com/macleamy/>).

The use and framing of Design Review as a tool to build confidence in decision-making and de-risk development is therefore strongly encouraged.

Scope and Viability

Supportive of paragraph 195. Particularly its recognition that developments at all scales may be suitable for review "where the scale or impact justifies the investment".

Building on paragraph 184, viability constraints are a recognised challenge, but can often be addressed through early engagement, ensuring that viability considerations do not undermine good design.

For particularly challenging sites, whether urban or rural, viability and proposed land use should be carefully considered. This may help avoid overcrowding of residential units to

make a scheme viable; or excessive investment and over-engineering of constrained sites. In such circumstances, the principle of development should be carefully assessed.

Design Review for Plan Preparation and Policy

In reference to paragraph 216, Design Review should not be limited to development, infrastructure, and design codes. It also has proven potential to play a significant role as a design tool during the plan preparation and policy-making process.

Design West has successfully used Design Review in collaboration with South Gloucestershire Local Authority during their Regulation 18 Plan-making process, examining Strategic Sites and masterplans of Site Allocations.

We strongly encourage the use of Design Review in shaping Strategic Planning Policy in addition to Development Management. This approach will help establish a more coherent and ambitious vision for development, rather than relying solely on policy requirements for planning applications to undergo Design Review.

Design Reviews at the plan-making and policy also offer significant benefits in terms of cost effectiveness, where early design input can achieve substantial impact.

Design West would be pleased to provide case studies and further information on this approach.

Decision making

Paragraph 258. is welcomed, in particular, embedding design considerations throughout a project's lifecycle in order to secure good design outcomes.

Through our Design Review work, Design West have identified a trend of declining design quality from Outline to Reserved Matters application stages of applications. Addressing this issue should be a priority.

Paragraph 265, on Decision-making is strongly supported. Design Review recommendations should be explicitly recognised and given appropriate weight in both planning decisions and development plans.

When applying design tools, it is essential that decision makers feel confident and empowered to refuse planning permission for proposals of insufficient quality that fail to meet established design standards.

Training

We support paragraph 261, which highlights the importance of training for Local Authority staff and councillors in design and the Design Review process.

Training for decision-makers such as councillors, is key to delivering well-designed schemes. The inclusion of Highways officers in design matters would also be beneficial, encouraging multidisciplinary collaboration across Local Authority teams.

Design West has successfully facilitated training around co-living developments for Exeter Council Officers and Members and in collaboration with Bristol City Council. Again, we are happy to be provide further information.

Design Review – Related Resources

We would expect the inclusion of Design Network’s National Design Review Charter (endorsed by the Urban Design Group) under ‘Related Resources’ on page 64.

The Charter expands on paragraph 196. and provides detailed guidance on the qualities and governance of an effective Design Review panel.

Link: [Design Network: National Design Review Charter](#)

The Design Network is the national body for design excellence. As a place-based and not-for-profit organisation, the Network supports design-led placemaking for the benefit of people, prosperity and planet.

The charter was authored by The Design Network, National Expert Panellists, and Local Planning Authority partners, and is therefore represents a key document that should be referenced within the new PPG.