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Welsh Government

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Consultation – summary of responses

Design in the Planning Process

June 2015

Contents

1. Introduction

1.1 On 6 October 2014 we consulted on how, if the mandatory requirement for Design and Access Statements (DAS) is removed from the development management process, we can support our national planning policy on design and facilitate the delivery of good design through the planning system. The consultation was open for 15 weeks and ended on 16 January 2015. A wide range of stakeholders were invited to respond to the consultation and the consultation documents were made available on our website.

1.2 This consultation summary report details the responses to this consultation and the next steps to be taken.

2. Background

2.1 The requirement to submit a DAS is set out in legislation; they are a mandatory requirement for many planning applications. The DAS is a communication tool that must explain how both good and inclusive design principles have been considered and applied from the outset of the development process. TAN 12 contains guidance on the preparation of a DAS, including its role and broad content.

2.2 It was anticipated that the introduction of mandatory DAS would add value to the planning and design process and would enable various stakeholders (such as local authorities, applicants, local communities and access groups) to engage more effectively in the process, and improve awareness of the various issues that should be considered. It was envisaged that DAS would result in an improvement in the quality, sustainability and inclusiveness of development.

2.3 Since their introduction in 2009 there has been criticism of DAS. In particular, concerns regarding delays to the planning process, additional costs and failure to effectively promote the consideration of inclusive access issues through the design process.

2.4 We commissioned The Urbanists to undertake research into the effectiveness of DAS in influencing the final design of development proposals as part of the planning application process. The research 'Review of Design and Access Statements in Wales' was published in November 2013 and found that DAS can vary significantly in terms of their quality. Indeed the weight attributed to a DAS became more significant when justifying proposals for potentially complex sites, both in scale and issues, and those located in more sensitive locations. In other cases DAS were often poor quality, only meeting the minimum requirements of the planning authority.

2.5 The general perception of applicants is that the mandatory requirement for a DAS has become a box ticking exercise used for validation purposes, having minimal impact on design quality and inclusive access. The report did however identify that DAS have raised the profile of design and inclusive access, and give consistency as to how they are considered and presented in

the planning process. The research also found that a key positive value of DAS is their role as a communication tool for multiple audiences.

2.6   In light of the above, the Planning (Wales) Bill proposed the removal of the mandatory requirement for DAS from primary legislation. However, taking into account responses to the consultation and the views of the Environment and Sustainability Committee, we have amended the Planning (Wales) Bill to retain in primary legislation the requirement for DAS to be submitted with certain types of applications for planning permission and listed building consent applications.

3.   Details of Responses

3.1   We received 69 responses to the consultation. We thank all those that responded.

3.2   Respondents were asked to assign themselves to 6 broad respondent categories. Table 1 below shows the breakdown of respondents. **Appendix A** includes a list of all respondents. Copies of the consultation responses received are published in their original form on the consultation pages of our website. These can be found here: http://gov.wales/consultations/planning.

Table 1 – Breakdown of Respondents

Category	Number	% of total
Business/Consultant Sector	7	10
Government Agencies/Other Public Sector	11	16
Local Planning Authorities	19	28
Other	6	9
Professional Bodies/Interest Groups	16	23
Voluntary Sector	10	14
Total	**69**	

3.3   The consultation document posed 15 questions inviting the views of stakeholders. A summary of the responses can be seen below in Section 4 and a statistical overview of certain responses is available in **Appendix B**.

4.   Response Analysis

4.1   A summary of the key findings under each question is set out below. This section provides a detailed summary and analysis of the key points generated for each question. Not all questions were answered by all respondents which will explain any numerical inaccuracies.

Question 1:

Is the planning system effectively delivering the five key objectives of good design?

1	Business	GA/OPS	LPAs	Other	PB/IGs	Voluntary	Total (%)
Agree	2	3	8	0	2	1	16 (23%)
Neither	3	3	7	3	3	1	20 (29%)
Disagree	1	2	4	1	6	6	20 (29%)

4.2 The statistics show that the responses to this question were mixed. However, the detailed responses highlighted that the design of new development is often not of a high quality and could be improved.

Yes	No
- The planning process is broadly set up to deliver good design - There have been significant improvements in housing design in recent years - Community safety is being addressed - Pre-application discussions are often beneficial	- Many schemes are just adequate, design standards need to be improved - Design is a subjective topic and there will always be disagreements about what good design is - Design appears to be subservient to the drive to construct new dwellings - Volume house builders are not taking account of TAN 12 and design briefs - LPAs are judged on the speed of their decisions rather than the quality of design - Design is difficult for LPAs to enforce on smaller projects - Lack of confidence that a LPA's refusal on design grounds will be maintained at appeal - The planning system cannot deliver good design alone

	• Disability access requirements are not being met
	• Character objective is not being met
	• Environmental sustainability objective is too broad
	• The removal of the Code for Sustainable Homes has been a disadvantage
	• Biodiversity benefits are not being delivered
	• Green infrastructure needs to be better incorporated into TAN 12
	• The opportunities for community growing needs to be improved
	• Schemes will need to anticipate the greater need for SUDS
	• Building acoustics need to be improved

Question 2:

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

2	Business	GA/OPS	LPAs	Other	PB/IGs	Voluntary	Total (%)
Agree	4	7	12	2	11	4	40 (58%)
Neither	0	2	4	0	0	6	12 (17%)
Disagree	3	0	3	2	2	0	10 (14%)

4.3 The majority of respondents agreed that a national development management policy on design would be beneficial. However, the responses from the business sector and the 'other' category were mixed, while a significant number of responses from the 'voluntary' sector were undecided. The detailed responses highlighted some confusion about the proposal and how a national

development management policy would relate to existing national and local planning policy.

Agree	Disagree
• May raise the importance of design amongst the general public • Would ensure consistency and clarity throughout Wales to local authorities and the public • Would give consistency to inclusive design – in particular a standard approach to disability access requirements • LDPs take too long to prepare and this is detrimental to the development process, having one policy would therefore be beneficial	• LDPs also do this so there is potential for repetition • PPW and TAN 12 are sufficient and another policy may prove confusing • Rather than introduce a new policy it may be more worthwhile to address existing policy • Design policy at national level would not deliver design quality • Might become too prescriptive • Local policy, guidance and flexibility are needed

Welsh Government Response

4.4   The responses to this question will inform the wider consideration of the development of a suite of development management policies.

Question 3:

Are area and site specific plans, such as masterplans, being used to positively plan for key development?

3	Business	GA/OPS	LPAs	Other	PB/IGs	Voluntary	Total (%)
Agree	3	4	12	2	1	1	23 (33%)
Neither	1	3	6	1	3	6	20 (29%)
Disagree	2	0	1	0	6	1	10 (14%)

4.5   Responses to this question were mixed. The majority of local planning authorities felt that area and site specific plans were being used to positively plan for key development. However, responses from other sectors were quite mixed. In the detailed responses there was a general consensus that area and site specific plans are in principle a good tool. The views summarised below identify the strengths of area and site specific plans as well as barriers to their success.

Agree	Disagree
• They are useful tools to guide development in key areas and/or provide detailed guidance on the way strategic sites should be developed	• Lack of resources and appropriate urban design skills are key barriers to LPAs producing masterplans, design guides and site specific SPG
• They can bridge the gap between LDPs and the proposed statutory community consultation prior to submission of a planning application	• Masterplans are not used enough and, where they are, are often done too late
• Important for the development of larger sites - the level of detail required must be representative of the development proposed	• Masterplans are often created by the applicant, and are then used as a framework for assessing their own proposals, removing the objectivity from decision making
• Having a site as a basis for discussion makes it easier to have meaningful dialogue with stakeholders	• Concept plans could be produced by the LPA with masterplans produced by the developer at pre-application stage
• Help address locally distinctive issues	• More involvement from DCfW is needed. They should be carried out by LPAs with support from the DCfW
• Success depends on applicants/consultants who are able to provide a multi-disciplinary approach	• Masterplan timescales can often impact negatively on the speed of the development process and site delivery
• Masterplans have become important in delivering design quality where they are being adopted	• The use of development briefs can impose onerous requirements that are unrealistic and include details that could be dealt with more effectively through the planning application process
• Masterplans work best when they are produced in collaboration	
• Masterplans are very useful in designing in biodiversity enhancements, in accordance with the integrated resource management required by the Environment Bill	• Not enough masterplans provide for green infrastructure
	• If area plans are to work they must be supported by engagement and an Equality Impact Assessment
• Place plans should be used to help inform planning decisions but	

should not necessarily be binding on the final decision		

Welsh Government Response

4.6   In light of the general consensus that area and site specific plans are, in principle, a good tool, we will work with DCfW to support local planning authorities in developing such plans. In particular, we will seek to develop the design skills of local authority planners through the provision of training. This will complement any work carried out with regards to site analysis (see question 4).

Question 4:

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	Business	GA/OPS	LPAs	Other	PB/IGs	Voluntary	Total (%)
Agree	4	10	15	3	10	7	49 (71%)
Neither	0	0	4	1	2	1	8 (12%)
Disagree	3	0	0	0	1	1	5 (7%)

4.7   A large majority of respondents were in support of the production of guidance on site analysis. The detailed responses identified the benefit of such guidance being supported by training. The responses, as summarised below, also identified issues to consider in the production of such guidance.

Agree	Disagree
• Such guidance could provide consistency across Wales • A consistent approach would assist with resolving access barriers faced by disabled people • Would help LPAs who lack the resources or skills to produce such guidance in-house • Guidance should be addressed to all sectors, including town and community councils and third sector groups	• There is already a large amount of design guidance available • A national approach would be difficult to deliver on a local scale • LPAs are better placed to provide such advice as they possess a detailed knowledge of their own area • There will be particular requirements within areas which have recognised sensitivities • May not be useful for architects

• Consideration needs to be given to the different needs of the audience – such as providing a framework for larger developers to consider and guidance for smaller developers	and those trained in design
	• Concern that the guidance would not consider off-site context which can be equally important
• This should highlight that developments should respond to the characteristics and context of the site and surrounding buildings and natural landscape	• Concern that the guidance would be limited to a prescriptive list or tick box list which would not be helpful
• It should pay more attention to heritage and groups of buildings	• Guidance should cover sustainable development not just sustainable buildings
• Guidance could be broken down into different types of development	

Welsh Government Response

4.8　　We will work with the Design Commission for Wales (DCfW) to produce practice guidance on site analysis.

Question 5:

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?

4.9　　Overall the majority of respondents agreed with the potential for pre-application discussions to facilitate the delivery of good design through the planning system.

Suggested Measures
• Pre-applications can assist in the improvement of design quality if the right people/bodies are involved
• Pre-applications give LPAs an understanding of an applicant's intention early on in the process and should enable local authority planners to suggest design solutions that meet policy before basic plans are sketched up
• LPAs need to be more pro-active at the pre-application stage
• Discussions need to be genuine and start early enough to enable constructive suggestions to be incorporated
• LPAs should be encouraged to identify design principles and more sensitive

local issues from an early stage

- The LPA should indicate in principle if it is satisfied with the standard of design

- There is a perception that the quality of the advice given can be variable and inconsistent, particularly between planning officers and highways officers, and influenced by members

- For pre-application negotiations to be effective it requires suitably qualified/skilled people within the LPA

- Training should be provided for local authority planners to increase their awareness of good design and negotiation skills

- LPAs should be resourced to support groups such as conservation area groups or internal local authority design panels

- A network of specialists (LPA, third sector and consultants) could be involved in pre-application discussions on appropriate applications

- Greater understanding between planners and disabled people/access groups, about their expectations and whether they are realistic/achievable, to enhance collaborative working

- There should be greater collaboration with other areas of the local authority, such as Building Control, Highways, Heritage, Rights of Way, Ecology and Landscape

- Pre-application discussions should be mandatory for developments of a certain size, type and scale with a reduced threshold for sensitive landscapes

- Fees for pre-application discussions should be removed or made deductible from the planning application fee. Having to pay for pre-application advice makes access to the service harder

- Discussions can happen in many forms and LPAs need to be conscious that stipulating minimum requirements for pre-application discussions could be detrimental

- The pre-application process needs to be enhanced

Welsh Government Response

4.10 We will work with DCfW to develop guidance to help facilitate pre-application discussions on design. The responses to this consultation will also inform the wider work being undertaken on the processes associated with pre-application discussions.

Question 6:

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

Suggested Tools
• Enhanced role for DCfW – providing design advice for larger applications • Strong national planning policy to allow refusal of poor design • A basic design appraisal tool based on key design principles in TAN 12 • Increased staff provision within LPAs and access to more specialist skills • The sharing of design skills and expertise across LPAs – potentially through a Joint Design Review Board • Funding/resources/toolkits for LPAs to produce localised design guides and design codes for particular areas and conservation area assessments • Dialogue and engagement with local disabled people to assist planners assess design quality • Use of social media and interactive design to shift the emphasis to a more inclusive process • Promotion of a broad range of exemplar developments. Including site visits and presentations from those involved with detailed explanation about the design and how issues were addressed • A review of appeal decisions relating to design issues as there is concern that the Planning Inspectorate do not give sufficient weight to design quality • Making DAS requirements more in-depth and comprehensive • Additional validation requirement to ensure that submitted plans and elevations highlight the surrounding context • Applications affecting listed buildings should include a summary of the reason for listing and an explanation of how the proposal respects those features

Question 7:

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

7	Business	GA/OPS	LPAs	Other	PB/IGs	Voluntary	Total (%)
Agree	1	1	4	0	4	1	11 (16%)
Neither	3	3	13	2	3	5	29 (42%)
Disagree	2	3	2	1	3	2	13 (19%)

4.11   The results of this question were mixed with the majority of respondents undecided about the proposal. In particular, the large majority of local planning authorities neither agreed nor disagreed about the proposal. The detailed responses highlighted concerns about the proposal, with many respondents questioning whether it would be effective in ensuring access issues are considered at the outset.

Agree	Disagree
• This proposal would help identify access issues from the outset • In the absence of a DAS this proposal would at least make applicants consider inclusive access • Applications should not be validated unless inclusive access has been considered	• This will not ensure sufficient consideration is given to access • This wouldn't embed the requirement to consider inclusive access at the outset as filling in the form is the last part of the process, by which time the chance to amend is too late • There would be a reliance on self assessment from the applicant, which would risk standards decreasing to the minimum • The question should also address how it does provide inclusive access, rather than just why it doesn't • This would not ensure that vehicular, cycle and pedestrian access would be provided to the proposed development • Disabled access would be better controlled through Building Regulations

Welsh Government Response

4.12   In light of the lack of support for the proposal, along with the decision to retain DAS for certain applications, we will not amend the 1APP form.

Question 8:

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

Suggested Measures
• Disabled access should be controlled by Building Regulations
• Improved liaison with Building Control
• Training for all public and private representatives – including online and practical training, such as navigating through a development in a wheelchair
• All new builds to meet Lifetime Homes standard
• 10% of new homes to be wheelchair accessible
• Include inclusive access in a design toolkit/framework
• Introduction of Equality Impact Assessments
• Make disability groups statutory consultees for relevant applications
• Improved consultation with town and community councils
• Guidance displaying examples of good and bad practice and updated minimum standards
• Any relevant applications for amendments to public buildings should require a DAS
• DAS should include consideration of people who are deaf and hearing impaired
• DAS should be cross referenced with Transport Assessments for major developments
• A question on the 1APP form asking if the site has been registered with National House Builders Council or Building Control and, if they have, the provision of a copy of the initial notice/reference
• The responsibility falls with developers and is not primarily an issue for LPAs

Question 9:

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

4.13   The responses to this question highlighted the important role of DCfW, particularly in providing training and advice on design. The responses also identified the potential of the PAIS in disseminating and promoting the sharing of good practice.

Suggested Measures

- Training - including sessions for both public and private representatives

- Good practice guidance - including diagram led documents and guidance demonstrating the economic benefits of good design

- Mandatory Design Review service for strategic or significant development schemes. Although, concern was also raised that the Design Review service is not an inclusive process and can be over critical with varying opinions expressed. It was also suggested that other bodies be involved in the Design Review service

- Promotion of sharing good practice between LPAs

- Annually highlight areas of good practice

- Awards for developments which demonstrate good design and inclusive access

- A national survey of design quality of development – similar to that previously undertaken by CABE in England

- An audit of LPA design skills

- Incorporating the local and front loading philosophy to ensure inclusivity

- Improved promotion of the historic environment, green infrastructure, biodiversity and acoustic design

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Welsh Government Response

4.14   These suggestions will help inform the work we undertake with DCfW and the PAIS to facilitate the delivery of good design. In particular, we will work with DCfW to provide further training and guidance on design.

Question 10:

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

4.15   The responses to this question primarily focused on the importance of training, with a number of suggestions relating to the way in which such training could be provided and the topics it could cover. The responses also highlighted the role that more formal training, such as degrees and masters, can play in raising design skills.

Suggested Measures
• Financial support to undertake formal design training – such as a bursary for the urban design courses at Cardiff University   • Improved inclusion of design in planning courses to give planners confidence in critiquing proposals   • Introduction of joint LPA design groups/panels   • A national skills survey of planners   • Short localised training sessions   • Cross LPA sessions   • Skills should be spread across LPAs   • Inclusion of all relevant LPA departments, public and private sector bodies to understand different perceptions   • Provided in a variety of formats   • Training should be free   • Compulsory sessions   • Visits to exemplar sites   • Training on related guidance, such as TAN12, Building Regulations and BS8300   • Disability equality training   • Training on viability   • Promotion of links between good design and good health   • Promotion of links between good design and environmental improvements

- Training on heritage issues

- Training on acoustic standards

Welsh Government Response

4.16   The consultation responses will be used to inform the development of measures to raise design skills of local authority officers and members. In particular, they will be used to inform work with DCfW to provide further training on design.

Question 11:

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	Business	GA/OPS	LPAs	Other	PB/IGs	Voluntary	Total (%)
Agree	3	6	11	2	7	8	37 (54%)
Neither	2	2	6	2	0	1	13 (19%)
Disagree	1	0	1	0	1	0	3 (4%)

4.17   The majority of respondents agreed that there is scope for local planning authorities to work more collaboratively on design issues. Only 3 respondents disagreed.

Agree	Disagree
- LPAs should share resources - A cross-authority design group, led by an architectural adviser, for design officers and planning officers would encourage greater communication and exchange of experiences between LPAs - An accessible group of design experts should be available for LPAs to consult - Design Review panels on a regional basis	- Design issues are localised - Cross authority groups may be difficult to maintain. Therefore any appointments should be made for the long term - Expertise can already be accessed from other bodies - LPAs lack the resources to implement change

• LPAs could share Supplementary Planning Guidance • Greater liaison between planners and Building Control • The standardisation of the pre-application process • A more positive approach to engaging with disability and other local groups • Allowing civic societies to write characterisation studies • A more consistent consultation process • Less focus on determining planning applications within a timeframe	

Welsh Government Response

4.18   It is recognised that there is scope for local planning authorities to work collaboratively on design issues and that there are examples of good practice across Wales. We will seek to facilitate such collaborative working.

Question 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?

4.19   The responses highlighted good practice in relation to schemes, guidance, masterplans, working collaboratively, reviewing completed schemes, engaging with stakeholders and accessing advice.

Highlighted Good Practice
Collaborative Working • Brecon Beacons National Park Authority has established a service level agreement with a local access group to review planning applications and provide training to officers • Pembrokeshire Coast National Park Authority use the adjoining authority's Access Officer to comment on planning applications

- Cardiff Council Access Focus Group and other groups set up in Swansea and Ceredigion

- Designing Out Crime Officers are involved in pre-app discussions in Gwent

Guidance

- The Way to Go Project, Disability Wales
  http://www.disabilitywales.org/toolkit/

- Planning Naturally, RSPB
  http://www.rspb.org.uk/forprofessionals/policy/planning/planningnaturally.aspx

- Sustainable Design Guide, National Parks

- Residential Design Guidance, Swansea City and County Council

- Sherford Design Guide, Plymouth City Council and South Hams District Council

- Monmouthshire County Council's Green Infrastructure SPG and LDP policy (GI1) – this has assisted major housing site at Penperlleni

Other Tools/Activities

- Community Calculator, Age Cymru
  http://www.ageuk.org.uk/cymru/get-involved/make-a-donation3/the-community-calculator-results/

- How to age-proof, Age Cymru
  http://www.ageuk.org.uk/cymru/professional-resources/archive/growing-older-in-wales/

- The Civic Trust for Wales - work on urban characterisation has the potential to raise public appreciation and understanding of good design, and contribute to local SPGs

- Members and planning officers of the Vale of Glamorgan Council regularly visit completed schemes to assess their design

- Former South East Wales Urban Designer Network

Schemes/Masterplans

- Caerphilly Library and Cardiff Airport are good examples of engagement with disabled people

- Coed Darcy, Neath Port Talbot

- Parc Derwen, Bridgend

- Swansea Marina

- Carmarthen Market redevelopment

- Redesign of Swansea train station

- Urban Quarter, Swansea

- Cardiff Central Square Masterplan

- Severn Farm Ponds, Montgomeryshire Wildlife Trust – example of SUDS that create multi benefits for people, wildlife and the local economy

- The Works Regeneration Proposals, Ebbw Vale

- Holyrood North, Edinburgh - for its reflection of the historic settlement pattern and masterplan

- Sugarhouse Close, Edinburgh

- Athletes Village, Glasgow

- Rogiet Primary School, Monmouthshire

Question 13:

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

13	Business	GA/OPS	LPAs	Other	PB/IGs	Voluntary	Total (%)
Agree	4	8	16	3	13	7	51 (74%)
Neither	1	1	2	1	0	1	6 (9%)
Disagree	2	1	1	0	1	0	5 (7%)

4.20 A large majority of respondents from all sectors support the retention of DAS for particular applications. In particular, the predominant view was that they should be retained for significant developments and in sensitive locations.

Agree	Disagree
- Useful for major developments, listed buildings, conservation areas and other relevant sensitive	- Unnecessary for many applications

areas • DAS act as an important communication tool for professional and public understanding and explain the evolutionary process of a proposal • Require applicants to consider how they have met the five objectives of good design • Act as a measuring tool for the success of a development • Useful for new/alterations to public buildings • Inclusive access and other issues could be neglected if DAS are removed	• As they are often put together at the last minute they hold little value • Seen as a tick box exercise • Much of the information is duplicated in other submitted documents • Requirements of the content, level and quality of the information are not stringent enough

Welsh Government Response

4.21   In light of the strong support for the retention of DAS for significant developments and in sensitive locations, we will amend the threshold for planning applications that require DAS. A public consultation will be undertaken to establish the appropriate threshold for DAS.

Question 14:

Should the mandatory requirement for Design and Access Statements be removed from secondary legislation?

14	Business	GA/OPS	LPAs	Other	PB/IGs	Voluntary	Total (%)
Agree	2	1	4	1	2	0	10 (14%)
Neither	2	0	7	1	0	2	12 (17%)
Disagree	2	6	8	2	12	6	36 (52%)

4.22   The majority of respondents disagreed with the removal of DAS from secondary legislation. In particular, a large majority of responses from the 'professional body / interest group' category disagreed with the proposal. Responses from the business sector were more mixed.

Agree	Disagree
• The requirement for DAS should not be in legislation • Planning policy should indicate the types of scheme that require a DAS • Wording of current legislation is causing validation problems and resulting in DAS being a tick box exercise	• The mandatory requirement for DAS should be retained in legislation • More notice is given to statutory requirements • There would be confusion if the requirement for a DAS was removed • Changes could slow down the planning process • Legislation should allow LPAs discretion in requesting DAS • Legislation should be amended in order to be more specific

Welsh Government Response

4.23   In light of the support for the retention of the mandatory requirement of DAS in secondary legislation, we will retain this requirement for particular applications.

Question 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.

Additional Comments
• There is a need for culture change to ensure that DAS do not remain a tick box exercise and that good design is not seen as an exception • National events, as well as local, need to be held to promote design • Design needs improved promotion in education courses • Greater collaboration between the RIBA and RTPI • Any guidance should provide advice on negotiation of design issues • Supporting application documents need to be proportionate to the proposal

- Need for a single Planning and Design Statement in order to simplify the process

- Need for improved professional respect

- Onerous conditions can hinder design due to timing constraints and costs of materials

- The cost of maintenance of buildings should not be overlooked

- Need for design based qualification requirements for certain size applications

5. Next Steps

5.1 We will review the threshold for planning applications that require a DAS. A public consultation will be undertaken to establish the appropriate threshold.

5.2 We will work with DCfW to raise the design skills of local authority planners, and other built environment professionals, and increase the design awareness of elected members. In particular, we will develop a training programme on design and produce guidance on site analysis.

5.3 We will continue to explore other ways in which we can support our national planning policy on design and facilitate the delivery of good design through the planning system.

Appendix A – List of Respondents by Category

The list below indicates the categories to which respondents assigned themselves when completing the consultation form. For data protection purposes the name and address details for those respondents who did not wish to be identified have been removed from the published consultation responses.

Businesses

1 – Bob Dewey Planning
27 – National Grid
30 – Sainsburys
31 – Acanthus Holden
39 – Persimmon (West Wales)
47 – Redrow
53 – Persimmon (East Wales)

Local Planning Authorities

3 – Merthyr Tydfil County Borough Council
9 – Caerphilly County Borough Council
11 – Rhondda Cynon Taff County Borough Council
15 – National Parks (x 3) (Brecon Beacons, Pembrokeshire Coast, Snowdonia)
16 – Monmouthshire Council
20 – Denbighshire County Council
25 – Torfaen County Borough Council
33 – Gwynedd Council
35 – Vale of Glamorgan Council
36 – City and County of Swansea
45 – Ceredigion County Council
56 – Powys County Council (Planning)
57 – Pembrokeshire County Council
59 – Bridgend County Borough Council
60 – Powys County Council (Biodiversity)
62 – Newport City Council
67 – Flintshire County Council

Government Agency / Other Public Sector

22 – Dyfed Powys Police
23 – Heddlu Gwent Police 1
24 – Heddlu Gwent Police 2
28 – Penarth Town Council
34 – One Voice Wales
38 – The Coal Authority
40 – The Theatres Trust
44 – Planning Aid Wales
46 – NRW
54 – North Wales Police
55 – DCfW

Professional Body / Interest Group

6 – Clwydian Range and Dee Valley AONB Interim Joint Advisory Committee
10 – RTPI Cymru
12 – Institute of Civil Engineers Wales Cymru
14 – Cowbridge with Llanblethian Town Council
17 – Age Cymru
29 – Cifa
32 – RNIB
49 – RSAW
50 – Wales Environment Link
51 – The Law Society
52 – IHBC
58 – Campaign for the Protection of Rural Wales
61 – Planning Officers Society Wales
63 – Wildlife Trusts Wales
64 – Home Builders Federation
65 – Guide Dogs Cymru

Voluntary sector

5 – Tenby Civic Society
8 – Disability Wales
13 – Abergavenny and District Civic Society
19 – The Civic Trust
21 – Newton and District Civic Society
26 – NDCS
37 – Federation of City Farms and Community Gardens
41 – Leonard Cheshire Disability
42 – Llandaff Society
66 – Community Housing Cymru

Other

2 – Kristina Martinsson
3 – Gruffyd Price
7 – Cardiff University
18 – Pippa Tee
43 – Welsh Water
48 – Canal and River Trust

Appendix B – Statistical Overview of all Responses

Question	Response	Business	GA/OPS	LPAs	Other	PB/IGs	Voluntary	Total (%)
1. Is the planning system effectively delivering the five key objectives of good design?	Agree	2	3	8	0	2	1	16 (23%)
	Neither	3	3	7	3	3	1	20 (29%)
	Disagree	1	2	4	1	6	6	20 (29%)
Question	**Response**	**Business**	**GA/OPS**	**LPAs**	**Other**	**PB/IGs**	**Voluntary**	**Total (%)**
2. Do you agree that a national development management policy on design would be beneficial?	Agree	4	7	12	2	11	4	40 (58%)
	Neither	0	2	4	0	0	6	12 (17%)
	Disagree	3	0	3	2	2	0	10 (14%)
Question	**Response**	**Business**	**GA/OPS**	**LPAs**	**Other**	**PB/IGs**	**Voluntary**	**Total (%)**
3. Are area and site specific plans, such as masterplans, being used to positively plan for key development?	Agree	3	4	12	2	1	1	23 (33%)
	Neither	1	3	6	1	3	6	20 (29%)
	Disagree	2	0	1	0	6	1	10 (14%)

Question	Response	Business	GA/OPS	LPAs	Other	PB/IGs	Voluntary	Total (%)
4. 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?	Agree	4	10	15	3	10	7	49 (71%)
	Neither	0	0	4	1	2	1	8 (12%)
	Disagree	3	0	0	0	1	1	5 (7%)
Question	Response	Business	GA/OPS	LPAs	Other	PB/IGs	Voluntary	Total (%)
7. Do you agree that the amendments to the 1APP form will ensure inclusive access issues are considered in development proposals?	Agree	1	1	4	0	4	1	11 (16%)
	Neither	3	3	13	2	3	5	29 (42%)
	Disagree	2	3	2	1	3	2	13 (19%)

Question	Response	Business	GA/OPS	LPAs	Other	PB/IGs	Voluntary	Total (%)
11. 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?	Agree	3	6	11	2	7	8	37 (54%)
	Neither	2	2	6	2	0	1	13 (19%)
	Disagree	1	0	1	0	1	0	3 (4%)
Question	Response	Business	GA/OPS	LPAs	Other	PB/IGs	Voluntary	Total (%)
13. Are there any benefits in retaining the requirement for Design and Access Statements for particular applications?	Agree	4	8	16	3	13	7	51 (74%)
	Neither	1	1	2	1	0	1	6 (9%)
	Disagree	2	1	1	0	1	0	5 (7%)
Question	Response	Business	GA/OPS	LPAs	Other	PB/IGs	Voluntary	Total (%)
14. Should the mandatory requirement for Design and Access Statements be removed from secondary legislation?	Agree	2	1	4	1	2	0	10 (14%)
	Neither	2	0	7	1	0	2	12 (17%)
	Disagree	2	6	8	2	12	6	36 (52%)