

Telford & Wrekin Council – Responses to Matters, Issues and Questions

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Matter 6, Issue 5

Issue 5: Whether the development design (DD) policies are effective and consistent with national policy

Q112. To be consistent with national policy, do the DD policies need to include the ‘agent of change’ principle to ensure new development can be integrated effectively with existing businesses and community facilities?

As currently written the Council finds that there is no conflict between NPPF paragraph 200 and the Development Design Policies in the plan.

It is however considered that the inclusion of explicit reference to either NPPF paragraph 200 or the relevant “*agent of change*” principles referenced within the text could help provide further clarity and improve the effectiveness of the policies overall.

As such the Council propose the following (CD08) wording be added to the supporting text of policy DD2.

“Where new development is proposed this should be in line with NPPF paragraph 200 and not unduly impact existing uses such as places of worship, pubs, music venues, sports clubs, waste facilities and utilities sites. Where evidence demonstrates that there is a potential conflict between uses, for example the risk of ball strike from an existing sports ground, the applicant will be required to provide suitable mitigation.”

Policy DD1 – Design criteria

Q113. Is there unnecessary repetition of requirements set out in other policies (e.g. in sections 6 and 7 of the Plan), which may make the policy unclear and ineffective?

No, Policy DD1, based on the National Design Guide, has been written to provide a list of design criteria which the Council will take into consideration for all planning applications.

Due to the broad scope of the Design Guide and the wide range of development types within the borough, the policy contains reference to many different elements of

design, such as climate change mitigation and enhancement of the natural environment, which are covered in more depth in other policies.

Despite the continuity of wording across multiple sections of the plan, the Council do not consider that policy DD1 contains unnecessary duplication of policies and finds no contradictions or conflict between the criteria of DD1 and other relevant policies.

Policy DD2 – Housing development design

Q114. Is there unnecessary repetition of requirements set out in other policies, including DD1, which may make the policy unclear and ineffective?

No, policy DD2 relates specifically to residential lead developments as stated in supporting text 9.7. DD2 provides guidance on features which will be assessed during the application process and what design features development will be expected to incorporate. Policy DD1 is much broader than policy DD2, seeking to provide guidance for developments of all types, including residential, as such there is continuity within the language.

Policy DD1 refers to provision of good quality homes, policy DD2 expands on this, giving more specifically what the Council will consider necessary for a good quality home.

Similarly, whilst there is continuity between policy DD2 and policies within section 9 (Housing) the Council considers that the goals and content of these policies is sufficiently different to not negatively impact the clarity and effectiveness of the policy and the plan as a whole.

The Council would not oppose the removal of reference within policy DD1.J to building orientation if the Inspectors consider that this is sufficiently covered by DD2.1a.

Q115. Is it clear how the policy will be applied to housing allocations and Sustainable Communities, given the design requirements for those sites/locations in policies HO1 and HO2?

Yes, the Council consider policy DD2 to be sufficiently clear as to be effective regarding its relation to policies HO1 and HO2.

However, as a result of feedback submitted during the regulation 19 consultation, the Council finds that the modification of policy DD2.2 to read as follows could be beneficial:

“Design briefs will need to be submitted, for estate developments (requirements for Sustainable Communities are set out in Policy HO2), as part of the application process with the detail being proportionate to the size of development.”

Regarding policy HO1, sites allocated for major residential development in HO1 will be supported where they comply with policy DD2, it is expected that the design brief required by HO1 will give due consideration to DD2 and explain how it intends to achieve them.

Q116. In part 2, is the meaning of “Design codes/briefs”, “estate developments” and “detail...proportionate to the size of development” clear and unambiguous?

The Council, following consultation, consider that the term Design codes / Briefs may require further clarification. As a result, the Council propose DD2 be reworded (see Q115) and the following be added to the glossary:

“Design Brief: A document produced by the landowner/promoter, which is submitted alongside any Masterplan with any initial planning application. The document should outline any site constraints and encompass the objectives set out in local planning policy including any essential development requirements for specific site allocations. It will form a guide for the design of future full and reserved matters applications; setting out intended uses, design aspirations, street hierarchy etc, in securing a well-designed sustainable site. The National Design Guide (NDG) should be used as the starting point in terms of a template for this document.”

The Council considers the requirement within policy DD2.2 for the detail of the design brief to be proportionate to be reasonable and, with the additional definition of Design Brief in the glossary, sufficiently clear.

The Council considers that modifying policy DD2.2 to refer to ‘Major residential developments’ (as defined by the NPPF) instead of ‘estate developments’ may be appropriate to improve clarity.