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To whom it may concern:

Consultation on the Draft Design and Place-making Planning Practice Guidance

Thank you for providing this opportunity to comment on the draft Design and Place-making Planning Practice Guidance. Historic England are pleased to have been able to participate at stages in the development of the consultation draft and welcome many of the changes that this successor to the earlier documents provide. As the government's advisor on planning for the Historic Environment, Historic England's remit is limited to those areas that fall within our interest and, as such silence on other areas should not be treated as agreement or acceptance.

In our view the documents provide a welcome update that better defines the relationship of features of design (the seven factors) with the factors that should influence these. Context has a more general role in this respect as an umbrella concept that can influence each of the seven factors to ensure development responds sensitively to place. We see this as a positive move that will support more sensitive design for historic places. The frequent references to integrating heritage assets and other aspects of the historic environment support this. Nevertheless, as we set out in our answers to the questions, this does leave some risk that without a clear hook, or question point for matters of contextual response, this could be overlooked in assessment of proposals or development of proposals, plans, guidance or code. We suggest ways to make this need more visible in our answers below.

The compilation of the previous four documents into one is supported as providing a clearer single source of reference for planners and designers. This reduces repetition and provides a helpful flow from introducing the concepts of the seven factors to plan, proposal, masterplan, guidance and code development to principles for assessing and determining applications. The sweep of guidance in Part 2 is impressive, but we highlight that that the role of planning policy as the point where these tools is given weight could be highlighted

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more clearly where the including of the current National Planning Practice Guidance in the document could lose its connection with the remaining NPPG chapters.

The consolidation of the documents into a single volume helps to reduce repetition, resulting in a more concise and understandable document.

As mentioned above, the repeated reference to conservation, integration and reuse of heritage assets, including their need for sensitive design approaches and the potential of guidance and codes to support retrofit for carbon efficiency are all welcomed. This support government policy as well as potentially making it easier for planning authorities, owners and developers to secure viable futures for the assets that contribute to the country's identity. Historic England support this approach which reflects the approach in our own [Historic England Advice Note 18: Climate Change and Energy Efficiency](#).

The PPG helpfully clarifies the government's approach to rollout of design codes as one tool among others to address issues and support planning, design and decisions and that may not always be the appropriate solution. This provides comfort that coding will be used where it is of greatest value and where more flexibility is required, such as in areas of highly varied historic character, other tools like design guidance may be preferred. Historic England supports this sensible approach. We also support the encouragement for coding to be more focused on the 'basics' of design to provide certainty for developers on features that most effect the viability of development, leaving the finer details of architectural character to design within the application process. Nevertheless, it would help to provide clarity that these features will still need to be considered with the process and some emphasis on the need to consider factors not captured in design tools at pages 84 and 85 in particular would help to highlight the need to consider these features as part of the design and application process.

Notwithstanding these comments we commend the writers of the Design and Place Making Planning Practice Guidance for a great achievement in bringing these documents together and for the positive evolution they have provided. We feel that this represents a more balanced and nuanced process that nevertheless paves the way for easier preparation of policies and design tools, planning applications and decisions, that together will deliver better development in places.

Our detailed answers to the consultation questions follow below.

Consultation Responses

Usability of the Draft Design and Placemaking PPG

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

Agree in part

Combining the National Design Guidance and National Model Design Codes Parts 1 and 2 into a single document reduces duplication and provides a clearer progression between the two. Packaging these with the retained and updated guidance on plan policy making and decision making from the current National Planning Practice Guidance could elevate their position within the plan and decision-making process, raising awareness and understanding of their importance.

Historic England supports the consolidation of the ten characteristics of good design into a core seven, as a more practical working list of issues, with 'context' as a golden thread running through them all rather than a standalone issue. This provides a more dynamic relationship between character, context and design outcomes, rather than treating character and context as a standalone issue.

Similarly, the importance given to the retention and reuse of heritage assets throughout the document is supported. It secures a common understanding of the potentially critical role for guidance and coding to support the widespread upgrading of heritage assets for energy efficiency, though with evident need to consider policy requirements around significance and technical considerations around specific energy solutions.

Regarding the guidance on use and development of design tools and policies in Parts 2 and 3 Historic England is pleased to see greater clarity on the flexibility of choice in use of tools and the move away from mandated 'district-wide' coding. This provides a more realistic and meaningful approach with greater potential for use of guidance in areas that require more nuanced consideration of existing character, as well as focused coding for areas that require consistency in approach to support more rapid decisions and consistency in design response. References to conservation areas in this respect are helpful and we support them.

The guidance on flexibility for coding to focus on what can be coded for, rather than seeking to cover all eventualities is also appreciated. This leaves greater potential to focus on resolving common repeated issues where a consistent, acceptable or required solution can be identified. Historic England see this as an effective means to address consistent points of tension by providing clarity after discussion and consensus building (termed 'Engaging with Impact' in the document) that can speed up decision making.

There are, however, areas where Historic England recommend greater clarity or evolution, specifically to underpin the importance of context as a golden thread and to ensure key messages from the current PPG are not lost. The guidance could, for example, be improved by providing more detail in each of the seven characteristics on the different approaches between places that this consideration of context should result in (see answer to Question 7).

Historic England see the updated Design Guidance in Part 1 as more readily applicable to decision making in support of the revised draft NPPF. The Guidance on Design Coding in Part 3 is also a more readily adaptable set of options for coders to consider selecting from, rather than feeling required to code for everything, everywhere, every time.

In terms of plan-making, the updated plan and policy-making section in Part 2 is presented in a more accessible and engaging format for a general reader. However, it now stands apart visually in format and physically (as a pdf) from the other chapters of the PPG which might impact its use and interpretation. The importance of incorporating design policies in local and neighbourhood plans could be clearer and clarity provided about whether the ‘vision’ discussed throughout Part 2 is that for the plan as a whole (which is a common element of plan-making), for the design approach within the plan, or for the design tool as a discrete product within that approach. In this regard the guidance also turns rapidly to explaining how diagrams can illustrate a design approach and a reader may quickly lose sight of the context that the policy is the underlying instrument of management that the diagrams explain. Providing better guidance on using diagrams may help to improve the effectiveness of the PPG but this needs to be carefully tied back to the means of giving them weight in decision making.

Areas for Improvement

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

Yes

Context

The integration of ‘Context’ as an underlying consideration in each of the seven features of good design is supported, reflecting its importance as a golden thread ensuring development responds successfully to place. However, whilst the role of context and character is articulated throughout the document, it would benefit from clearer explanation, visibility and clarity as to how it might be understood within each feature. If visibility of the importance of context is lessened, or if there is insufficient guidance on how to understand it, there is a risk it becomes hard to test for decision-makers and hard to influence for stakeholders.

Ways to achieve this include:

- Adding 'Context' at the centre of figure 2, showing that it unites the seven features of place surrounding it.
- In each of the seven features in part 1, elevating the 'x and context' headings to demonstrate it is a design consideration of equal importance to those that follow. For example, paragraph 25 would become L1 Liveability and Context, and paragraph 26 would be placed before this.
- Articulating contextual factors that might influence design response in each feature, potentially backed up with case studies or photographs of successful development with a caption explaining that a feature of design has been included as a response to context.
- Consistently including context as a 'Reason' for setting design code parameters in the Section 3 guidance. This could include context as a reason under guidance for codes for Building Line (on page 121), P1 Scale and enclosure (page 130), or for selecting or retaining areas of traditional surfacing materials or other street furniture (page 135 – where this could also reference Historic England's Streets for All Guidance) among others.

Materials

Whilst there is an overall move away from specifying architectural details in coding, the use of locally sourced building stone remains important and is reliant on certainty for quarry operators supported by policy, guidance and code. The NPPF requires provision of suitable sources of natural stone to repair historic buildings. This should, helpfully, carry through to design policy and recognition of the importance of these materials to local identity. This could be reflected under both the climate change (where using locally sourced natural materials provides a low carbon or potentially even carbon neutral source of materials) and identity features in part 1, and the guidance for coding for these features in Part 3. To support this, Historic England provides an [atlas of locally used stone and quarries](#) and has published research on the [carbon benefits of using indigenous natural slate](#).

Other

There are other key areas where Historic England recommend additional information is needed to greater support design objectives:

- **Plan policy:** Part 2 would benefit from clarity on the focus of the guidance on planning policy and decision making. It should be more clearly stated where and how strategic policies, masterplans, guidance and codes should be included in local plans, in the context of the revised 30-month timeframe, and the role of supplementary plans.

- **Character studies:** Reference to the value of character studies as evidence is welcomed, but Historic England recommend that Conservation Area Appraisals are added at page 76, as they should provide evidence about what characteristics of an area are desirable to preserve as well as those that could be enhanced.
- **Design negotiation:** The guidance helpfully clarifies the limits of coding, enabling users to more focus on impactful parameters that provide certainty. However, reference should be made to the fact that other features of design may need to be negotiated through the planning process. It would help to provide clarity on pages 84 and 85 of how design quality issues that are addressed in policy (including the NPPF) but not by other design tools should be negotiated within a planning application – for example by collecting relevant evidence, designing a response that fulfils the policy need and explaining that approach within a design and access statement and through comparison to exemplar development that is acknowledged as good practice.

Inclusivity of the Draft Design and Placemaking PPG

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? N/A

9. What additional considerations or clarifications might be necessary to ensure planning practice guidance supports inclusive and culturally appropriate design and placemaking? N/A

Effectiveness of Tools within the Draft Design and Placemaking PPG

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

Agree in part

Model design codes could provide greater clarity for planning authorities on the government's intended scope for these documents as well as reducing repeated effort to develop codes for similar parameters. If these were narrow in scope they could provide a framework to address the most common coding issues, leaving more resource available to prepare guidance or code for more locally distinct issues. Nevertheless, they would need to provide clarity that they do not represent the limit of features that should be considered within the design process.

However, if they were to go beyond such a narrow scope there is risk of them generating repetitive design by introducing measures that are accepted too quickly and without consideration for response to local character and distinctiveness.

11. What other tools would support this?

Our response suggests there is some further work needed to provide clarity on how assessments of character and context can provide meaningful responses in design and in masterplans, guidance and codes. This could benefit from development of a toolkit to help planners and designers understand where context requires a response and how this can be achieved. The [Oxford Character Assessment Toolkit](#) provided a basis for developing such an approach that was shown to be widely applicable in terms of developing an understanding of the features that most significantly contributed to local character (both positively and negatively). Developing an approach on this basis with more focus on how to secure positive outcomes for a new generation of designers could be instrumental in supporting the planning system to improve design of development. Historic England would be interested in working with the government to develop a toolkit on this basis.