

Planning Officers Society (POS)

Response to Consultation on the Draft Design and Placemaking PPG

Question 6

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

POS agrees and generally welcomes the draft Design and Placemaking PPG which is a clear improvement in both usability and practical effectiveness. Consolidating three separate documents into a single guidance note makes the material far more accessible for practitioners and reduces duplication. The removal of the mandatory requirement for authority-wide design codes is also welcome, as this expectation was disproportionate and unworkable for many LPAs. The revised PPG instead provides a more balanced framework that aligns with the NPPF and recognises that design codes, design guides, briefs, masterplans and design review panels each have appropriate roles depending on local context. This greater flexibility allows authorities to select the most suitable design tools for their circumstances.

POS therefore agrees that the revised PPG represents a more proportionate, workable and context-sensitive approach for LPAs.

We also welcome the move from the word “beauty”, a very subjective term, to high quality design.

Detailed Observations

1. Page 11 Context paras 19-21

Under the Context section para 19-21 there needs to be recognition that some sites are within conservation areas. LPAs have to pay special attention to whether a proposal preserves or enhances the special architectural or historic character of the area.

2. Page 18, Line 6 – “Well-managed and maintained”

The guidance would be strengthened by explicitly stating that management and maintenance considerations must inform design from the outset. LPAs frequently encounter schemes that are visually attractive but unmanageable or prohibitively expensive to maintain. Embedding management as a design input would help avoid this.

3. Climate (pp. 20–26)

The draft should more clearly distinguish between the roles of Building Regulations and planning. Much of the fabric and operational performance of buildings is governed by Building Regulations. Planning’s contribution to sustainability lies in spatial and design choices—such as land-use mix, walkability, cycling infrastructure, orientation, natural shading, and reducing car dependency. This distinction should be explicit to avoid confusion and unrealistic expectations of the planning system.

4. Design in plan-making (from p. 66)

While design review is referenced, the PPG does not mention design review of Local Plans themselves. This is a missed opportunity. POS has direct experience of this approach (e.g., Croydon's Core Strategy, reviewed with CABE), where it significantly improved the clarity and quality of the final plan. The PPG should encourage LPAs to use design review at plan-making stage.

5. Design tools – Masterplans (p. 72 onwards)

Under Design Codes, the draft states that they are “most effective when prepared collaboratively”. This principle is equally—arguably more—important for masterplans. Collaboration with delivery partners (developers, landowners, infrastructure providers) is essential to ensure feasibility and commitment to implementation. This should be explicitly stated in both the masterplanning section and the “Preparing a masterplan” guidance (p. 77).

6. Making decisions about design (from p. 82)

The diagram on p. 85 encourages pre-application engagement with decision-makers, but the text does not reference pre-application engagement with planning committees. POS guidance strongly advocates this, as it improves understanding, reduces risk, and supports better decision-making. The PPG should reflect this.

7. page 32 para 94 Urban Trees

Urban trees refers to the value of trees but in practice they are difficult to achieve alongside streets and are often objected to by the highway authority. It would be good to have some firmer wording to strongly support their provision and to require corridors for underground services to be identified at detailed planning application stage.

8. page 39 Movement (parking specifically)

Car parking is often one of the most challenging aspects of design. The reference in para 118 to overlooked parking courts is most welcome. These work very well at Poundbury Dorchester and Nansledan Newquay and help avoid cars dominating the street scene. FOGs (flats over garages) and sentinel houses within courts have prove to provide effective surveillance. Street trees and good detailing are important for their success. It would be good to include a diagram or photo showing a successful parking court

There could be reference in this section to basement parking in high density apartment schemes. There should have vehicular access discretely and should not result in “dead” frontage at pavement level.

Question 7

Are there any aspects where clarity, accessibility, or practical application could be improved?

1. Large-scale outline applications and EIA/heritage considerations

The PPG lacks guidance on how masterplans and design codes should be used to secure quality in large-scale, parameter-based outline applications—particularly where the development is EIA development or affects heritage assets. In such cases, a design code cannot simply be conditioned; it must form part of the application to allow the LPA to discharge

its EIA and heritage duties. This will also be relevant to large-scale Permission in Principle (PiP) proposals, including those emerging through New Towns.

2. Regulatory vehicle for Codes and Guides

There remains uncertainty about the appropriate regulatory status for design codes and guides. Historically these were SPDs, but the new system introduces Supplementary Plans, which require Examination. A lighter-touch process is needed for design tools that do not warrant full Examination.

POS proposes a proportionate hierarchy:

Document Type	Examination Requirement
Spatial Development Strategy (SDS)	Full Examination
Local Plan (LP)	Examination for strategy, allocations, and where there are outstanding objections to DM policies; PINS written-representation check (NDMP compliance) for all other policies
Supplementary Plans (SPs)	Examination only for outstanding objections; PINS written-representation check (NDMP compliance) for other policies; Council approval for the remainder

This approach maintains rigour while avoiding unnecessary burdens.

Question 8

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

POS supports the intention to ensure that the principles apply to all forms of development, including traveller sites. However, the draft would benefit from clearer guidance on general design principles specific to the functional, cultural and spatial needs of traveller communities. Without this, LPAs may struggle to apply the guidance consistently.

Question 9

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

To ensure inclusive and culturally appropriate outcomes, the PPG should:

- Provide clearer guidance on how design principles apply to different forms of accommodation, including traveller sites, supported housing, and culturally specific living arrangements.
- Emphasise early engagement with communities whose needs may not be well represented through standard consultation processes.

- Highlight the importance of flexibility in layout, plot size, communal space, and service provision to reflect cultural practices.
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Question 10

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

POS endorses the use of templates, model codes and toolkits to accelerate the preparation of local design codes. These resources can improve consistency, reduce duplication, and support LPAs with limited capacity but they must allow flexibility and be adaptable to local circumstances and priorities.

Question 11

What other tools would support this?

Additional tools that would support efficient and high-quality design code preparation include:

- **A national library of good practice and examples**, including codes for different settlement types, densities and development forms.
- **Digital mapping and characterisation tools** that streamline baseline analysis.
- **Guidance on engagement and toolkits** to support meaningful but proportionate community involvement.
- **Guidance on integrating design codes with viability, infrastructure planning and delivery strategies**, ensuring codes are implementable.
- **Clearer templates for masterplans**, particularly for large-scale or phased development, to ensure alignment between masterplans and design codes.