

THE ISLINGTON SOCIETY

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to:

The

Ministry of Housing, Communities and Local Government

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The Islington Society response to the consultation on 'National Planning Policy Framework and National Model Design Code'

The Islington Society has the following comments on the proposed amendments to the National Planning Policy Framework and the proposal to adopt a National Model Design Code by the Ministry of Housing Communities and Local Government. These comments refer to both consultations with the following overarching comments.

We are responding to the proposals as they apply to varied, finely grained, dense urban environments in London, specifically Islington

Comment

Principles :

The Islington Society welcomes the Government's focus on the quality of design. We agree that the design Codes should be piloted before being adopted nationally.

Community engagement :

Design Codes cannot be 'National'. There is in Britain a very wide variety of communities. Local communities will know their areas best to develop their own design codes. The engagement of local stakeholders is essential.

We recommend that the development of Local Design guides includes establishing a local stakeholder group.

Beauty :

Beauty is highly subjective

To embody it in a Design Code relies upon consensus, implying adoption of a code that is likely to represent a lowest common denominator.

This will tend to produce Bland Designs that are less than beautiful.

Creativity is required if a character that is satisfying is to be achieved. Innovation must not be stifled.

We recommend that a policy should also be included that encourages innovation, creativity and contemporary design.

Context :

Analysis of context

Contiguous areas bleed into each other

Do not replicate the character of what has gone before, build as of today for the time we are in, for the future.

We recommend that in addition to an emphasis on context analysis, a policy should also be included that discourages replication and encourages contemporary design.

Policy conflict :

The Good Design intention and the Design Code principal are in direct Conflict with Unregulated Permitted Development Rights without any design control, specifically the right to add two storeys and convert between a wide range of planning uses.

We recommend introducing a requirement that PDR developments are submitted to LPAs for design approval

Planning Applications :

The bulk of a LPA's workload is in local, small scale - often householder - Planning Applications. The Design Codes are intended for new coherent developments. They do not deal with small, independent applications.

We recommend that impetus is given to improving small new buildings, extensions and conversions and that Design Codes for small scale works should be developed.

Transport and Highways:

Transport Planning is an essential part of place-making and good environmental design. Good Design of the environment should also encourage car and private vehicle reduction

We recommend that Transport Planning is also featured in the Design Codes.

Capacity and Resources :

The day-to-day demands on LPAs, focused as they are on immediate Planning Applications, are enormous. Most are overstretched and lacking the capacity to deal with additional burden of developing Local Design Codes.

We recommend that additional resources are provided from Central Government in line with its aspiration to improve design nationally to deal with the additional burden imposed on LPAs

Yours etc.

David Gibson

(for the Islington Society)

This response to the 'National Planning Policy Framework and National Model Design Code' consultation are made by The Islington Society, a charity established in 1960 to encourage the promotion and safeguarding of the amenities of Islington.