Waring N

Dear Sir/Madam

Local Plan 2020 / Design / Stage 2 Consultation

I am pleased to offer the following comments.

In general I commend the efforts of Merton Council to strive for high quality design in all development proposals.

However:

1) please shift the apparent focus from place-making in the future to DESIGN CONTROL NOW.

Adjust the structure and implied priorities of the policies and give more emphasis to ALTERATIONS AND EXTENSIONS.

I contend IT IS HERE THAT PLANNING HAS MOST MEANING TO MOST PEOPLE. I believe you wish the public would engage more with the local planning process, so by this means you make it more local to them.

2) Place-making and public realm needs to be judiciously edited, so that the former becomes part of the latter, establishing a clear hierarchy.

In essence, the policy structure should start with the strategic concern for high quality design in all development; this should reflect the importance to most people of alterations and extensions to existing buildings (usually their own home/neighbourhood); this should then extend into the public realm; of which, place-making, albeit important, is a bit-player, along with the other matters of concern such as tall buildings.

Design and Access Statements (DAS) should be a prerequisite for Development Control, in order that proposals are analysed as clearly as possible against local plan policy and guidance.

The DAS is the mechanism through which Development Control must consult with Design Control and the Design Review Panel.

Thus, the current policy structure should read as this:

Current policy structure   **Change to…………………………………………………..**

Strategic Policy LP D5.1 Place-making and design   **Strategic Policy D5.1 Design considerations in <u>all developments</u> i.e raising**

generic issues

Policy D5.2 Urban design and the public realm   **Policy D5.2 Alterations and extensions to <u>existing</u> <u>buildings</u> i.e. dealing with**

the tangible here and now

Policy D5.3 Design considerations in all

developments   **Policy D5.3 Urban design and the public realm; public/private space management; mixed usues; security i.e dealing with civic issues**

Policy D5.4 Alterations and extensions to

Policy D5.4 Place-making; tall buildings; landscape; pedestrianisation i.e the civic made manifest.

existing buildings

Policy D5.5 Managing heritage assets   i.e dealing with our connections with our past

Policy D5.6 Advertisements   i.e dealing with market forces

Policy D5.7 Telecommunications   i.e dealing with information

Policy D5.8 Shop front design and   i.e dealing with the high street

signage

Policy D5.9 Dwelling Conversions   i.e dealing with housing shortage

Design Quality

Design quality can have a number of different meanings and your policy needs to define it in a clear way that is prioritised, measurable and testable.

Local government design control is limited, and fundamentally, the standard of design quality is set by the client and their budget, be they private or public.

Design quality is not always the primary objective for the client; time or cost may be more important. Furthermore, it is only realistic to specify a very high standard of design quality, if the budget is available to achieve that standard.
 If the client has little experience of design and construction projects, they may wish to appoint an independent client adviser, such as a Registered Architect to assist them.

The agent's role includes:

- Ensuring that the vision for design quality is clearly defined in relation to the Local Plan.
- Ensuring that objectives for design quality are described in the planning application.

PLEASE EMPHASISE THIS IN YOUR LOCAL PLAN.

YOU WILL ONLY GET THE BEST BY ENCOURAGING AND EMPLOYING THE BEST.

It is important that assessment of design quality is carried out in a structured, formal way, and is properly recorded.

Design quality can be defined, prioritised and measured quite precisely, and criteria weighting can help in the appraisal of options, in particular where conflicting views exist amongst those carrying out the assessment.
I call these "rules". Some, on Merton Design Review Panel for instance, have objected to such notions. But I maintain that design control must aim for more "science" and hence rules, which might include:

- How spaces relate to each other.
- How well the design creates places for entry, reception, breaks, catering, and so on.

- Whether the design is accessible and welcoming.
- Accessibility for people with disabilities.

- Quality of views and outlook.
- The ability of individuals to control their environment.

- Use of colour, texture, light and architectural features to enliven the environment.
- Flexibility of layout.
- Overall standard of materials and finishes (including life-span and maintenance issues).
- Sustainability of materials.
- Build quality and robustness of systems, finishes and fittings, furniture and equipment.
- Energy consumption and pollution, both in construction and in use.

- Whether the design is safe to use and maintain.

- Whether the design can adapt to changing demands.

Some existing systems for assessing design quality, or aspects of it, include:
- Housing quality indicators (HQI).
- Achieving Excellence in Design Evaluation Toolkit (AEDET) for healthcare buildings.
- Building Research Establishment Environmental Assessment Method (BREEAM) for fuel economy, waste and pollution, environmental diversity   and transport.
- Building for life (for housing developments).

My more detailed comments re offered below, with reference to the original text.

Strategic Policy LP D5.1	*COMMENTS*
Placemaking and design	***Place-making***
How our streets, town centres, public spaces and neighbourhoods look and feel is important to our sense of wellbeing and safety.	*Place-making is one important aspect of urban design, but does not merit this primacy.*
The council will require all development to be of the highest design quality, supports vitality and viability of its town and local centres and long-term economic prosperity and quality of life.	*Place-making should therefore form a sub-set of a Public Realm policy.*
	Create a new 5.3 for PUBLIC REALM
Public Realm	**This should be the prime concern of urban design.**

	Urban design policies should spring from this concern to enhance the **public realm.**
e) Designing out crime, anti-terrorism, <u>dementia friendly</u>, and measures to help manage flood risk should be actively considered at the earliest stage of planning the public realm depending on the location, scale, and setting of the development.	Why dementia-friendly? Is this the Council's current favourite disability? Why not Parkinson's? Why not just refer to generic impaired mobility (which includes anyone with eg a pram, heavy shopping, suitcase, wheelchair)
	INSERT HERE FROM CURRENT 5.2 f) New development should provide and reinforce a clearly identifiable network of public streets and spaces that constitute the **public realm**, based on the creation of defensible space and natural surveillance, creating an appropriate gradation between public and private space.

g) Proposals for changes to and enhancement of the highway and **public realm** shall be designed according to best practice, minimising clutter and, depending on their scale and impact, may be subject to a design review process.

Proposals should include tree planting where possible and appropriate.

h) Development in town centres and other retail and mixed use areas must provide a mix of compatible uses appropriate to their location that together create high quality neighbourhoods, respect local character (see Borough Character Studies **WHEN THEY ARE COMPLETED FOR ALL AREAS**) and promote vitality and vibrancy across the borough whilst supporting regeneration initiatives. Proposals must also interact positively with the **public realm** by the creation of active and attractive frontages that promote natural surveillance through visibility between the street and the interior of the building and not create dead frontage through lack of windows or provision of advertising, shelves or

screening which prevents easy visibility between the ground floor and the street.

i) Opportunities for enhancing biodiversity in all amenity space should be taken

for all development proposals where appropriate, to strengthen the green infrastructure of the borough.

j) Proposals for the conversion of front gardens for vehicle parking should not be detrimental to the character of the street or highway safety or undermine biodiversity, prevent sustainable drainage or reduce highway safety.

k) As part of larger developments and enhancements, the council will seek to achieve innovative and interesting provision of public art in the **public realm.**

Good urban design

5.2.1 Building places based on sound and established principles of good urban design is a fundamental element of successful place-making. It is a holistic approach to the physical arrangement of our environment. It encompasses issues of layout, land use, security, economic development, regeneration, community and social life and the general appearance and attractiveness of places. It is also key to achieving the sustainability of our environments by building places that have inherent longevity and an ability to adapt to changing circumstances inexpensively.

5.2.2 It is important that our urban environments are inclusive, publicly accessible, inviting and easy to understand. This is the form of most of our urban townscape and what works best. It enables places to function efficiently and adapt well to change over time. Changing poor design in the future almost always requires huge upheaval and public expense. Places that work well tend to look after themselves and adapt gradually over time.

5.2.3 The basis for this urban environment is the traditional street, which can accommodate all types of use in a flexible manner. This

is recognised in Policy D1 of the New London Plan, which states that the form and layout of a place should be street-based with clearly defined public and private environments. A street has a number of essential characteristics. It primarily has a movement function which can be adapted for use by a range of different modes; it is therefore predominantly linear in character and should be designed to indicate that it links one place to another as part of a wider network of streets.

High quality **public realm**

5.2.4 The council will be seeking high quality public realm irrespective of the existing state.

Public realm

5.2.11 A vital part of how we perceive our environment comes from the design, layout and appearance of our streets and spaces – the **public realm**. New, larger developments create new streets and spaces. Smaller, individual developments affect the appearance

and perception of the existing public realm. Careful urban design consideration needs to be given to the impacts on the public realm by all development, from small scale safety and parking schemes to major town centre enhancement projects.

5.2.12 The council will seek to improve the quality of street furniture, lighting, landscape treatments, surfacing materials and signage in the borough either as part of the development of sites or through environmental improvement schemes.

The existence of poor **public realm** should be no justification for average or mediocre proposals for the public realm. The NPPF states that it is important to plan positively for the achievement of high quality and inclusive design for all development including individual buildings, public and private spaces and wider area development schemes.

Developments are expected to ensure the establishment of a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit.

5.2.5 All developments irrespective of size should be able to deliver **public realm** improvements. **Public realm** improvements cannot be used to justify inappropriately large or dense proposals that do not accord with other development plan policies.

Successful **public realm** is not solely dependent on having a mix of uses. Rather, having appropriate uses in appropriate locations will be the basis of a successful **public realm**. This may not necessarily require mixed use.

5.2.6 Local streets can take on a stronger 'place' character. Streets are physically defined by the buildings that front them and it is therefore important that they do so in a way that reinforces their linear form. Streets are, and should be, public places. The fronts

of buildings and their main access points should be directly from the street.

This creates a layout that defines the street as a public place and the land further to the rear more private.

Defensible space

5.2.7 Well-designed streets feel safe if they have 'natural surveillance' and an appropriate transition from public street to private building – or 'defensible space'. Natural surveillance is created by ensuring there is an appropriate and complementary mix of uses, particularly at ground floor; by maximising the number of entrances and having clear views between the interior of non-residential buildings and the street – rather than being obscured by blinds, shutters or internal advertising.

5.2.8 Defensible space is important in providing a clear buffer between public and private realm. This helps create a sense of security for residents and can deter opportunistic crime. Defensible

space allows for a graduation from public and private by means of landscaped amenity or garden space. This can be effectively utilised for facilities such as bin and cycle storage. Clear boundary treatments such as hedges, walls and railings are important in providing effective defensible spaces. For residential areas natural surveillance is best created by maximising entrances and having good views from habitable rooms directly from the dwelling into the street.

Safety and security

5.2.9 Well-designed places feel safe because they have built-in natural surveillance through the design of buildings and spaces, as well as having complementary mixes of uses and activities. Places that work well and look good also help engender a sense of belonging and local pride, which in itself encourages community participation and helps keep a place safe. Excessive and overt manifestations of security features often have the opposite effect.

Gated development

5.2.10 An example of this is gated development which may address security concerns, however they restrict public access and therefore choice. This is considered divisive as it reduces social, visual and physical permeability and actively works against engendering community and social cohesion. It is therefore likely that most types of gated developments will be contrary to this policy, particularly parts (a), (b) and (e) and are therefore discouraged by the council.

Policy D5.4 Alterations and extensions to existing buildings	Change priority to ……….LPD5.2 Emphasise requirement for high quality design OVER "complementary". Roger Scruton Commission is grappling with this. See how it works out.
Policy aim	
To achieve high quality design and protection of amenity within the borough.	To achieve encourage and promote high quality design. (Tell your colleagues in DC ....protection of amenity within the borough NOT *amenities.)*
Policy	
Alterations or extensions to buildings will be expected to meet the following criteria:	Be presented with a Design and Access Statement in accordance with CABE guidance………….. *"Design and Access Statements: How to write, read and use them"*

	Development proposals should be based on an assessment of character and recognise the local distinctiveness of areas and emphasise a positive local sense of place. Planning applications shall be accompanied by a Design and Access
i Complement the design and character of the original building with respect to its materials, form, scale proportions and massing;	*Complement* is too bland a term. Arguably, any alteration complements. Choose a different word or define it more clearly. *Correlate* is better, because it infers "reference to" and follows the CABE approach to considering context and character. *high quality contemporary extensions* may be appropriate, because they follow this approach. Any high quality product should speak for itself, but a thoroughly reasoned approach in relation to the host property and immediate context is essential, though often poorly argued in planning applications.
	high quality contemporary infill development will be promoted in the right context.
	where the architectural quality is exceptional and the building and context can sustain this without having a negative impact on the host building or adversely affecting a positive prevailing street character.

ii. Complement the form, layout and character and appearance of the wider setting;	Omit Complement and refer to CABE guidance instead. A high quality product with a thoroughly reasoned approach in relation to the host property and immediate context is required.
iii. Ensure that noise, vibrations or visual disturbance resulting from the development do not diminish the living conditions of existing and future residents;	these are NOT planning matters. They are controlled by environmental/health and safety legislation.
iv. Where the proposal incorporates a new or altered roof profile, this must be complementary to and sympathetic to the original building and the local context;	is it really necessary to refer to roof profile? Omit *Complementary* and *sympathetic*. A high quality product with a thoroughly reasoned approach in relation to the host property and immediate context is required.
v. Ensure proposals for dormer windows do not dominate the existing roof profile and are sited away from prominent roof pitches, unless they are a specific feature of the area. Generally dormers on the front of houses are inappropriate and will not be permitted;	is it really necessary to refer to dormers? A high quality product with a thoroughly reasoned approach in relation to the host property and immediate context is required.
High quality contemporary extensions in a contrasting architectural style to the original may in some cases be appropriate. The council will welcome these on a case by case basis. They must	Give this primacy, not "complementary" designs.

be of the highest architectural quality and thoroughly reasoned in relation to the host property and immediate context.	
Justification	include this as policy NOT justification
Well-designed buildings	
5.4.1 Well-designed buildings make an important contribution to the character and quality of an area. Extensions must be as well designed and architecturally competent as new buildings. Whether visible from the street or not, all extensions should be of a high quality design. Generally, extensions to be sited to the rear of the building and have a minimal impact on the street scene. Side extensions and those on street corners which will be visible must exhibit particular care in their design and how they relate to both the host building and the street scene.	Extensions must be as well designed and architecturally competent as new buildings. Generally, extensions to be sited to the rear of the building and have a minimal impact on the street scene. Side extensions and those on street corners which will be visible must exhibit particular care in their design and how they relate to both the host building and the street scene.

Yours faithfully