Suffolk Design

Suffolk's Current
Approach To Design

Topic Paper

1

THE FUTURE; CHALLENGES AHEAD

1 SCOPE

THE PURPOSE OF THIS PAPER IS TO EXAMINE CURRENT PRACTICE THROUGHOUT SUFFOLK REGARDING LOCAL AUTHORITY POLICIES, PRACTICES, RESOURCES AND DECISIONS THAT IMPACT ON THE DESIGN OF THE BUILT ENVIRONMENT (INCLUDING THE RELATIONSHIP TO THE 'NATURAL' ENVIRONMENT). INEVITABLY THIS WILL CONCENTRATE ON THE SPATIAL PLANNING SYSTEM BUT WILL NOT IGNORE OTHER AREAS WHERE LOCAL AUTHORITIES HAVE IMPACT SUCH AS HIGHWAYS, THE PUBLIC REALM AND PUBLIC BUILDINGS.

Information has been gained from published sources, the workshops and roundtables that have taken place so far, specific meetings with the DPOG/DMOG group and with Highways and other County Council officers and informal feedback during the 'Achieving well-designed places' training sessions.

2 SUMMARY

THE PEOPLE OF SUFFOLK HAVE A STRONG IDEA OF WHAT IS SPECIAL ABOUT THEIR COUNTY. THE COUNTY HAS A STRONG RURAL IDENTITY SYMBOLISED IN ITS LANDSCAPE, COAST AND HISTORIC TOWNS AND VILLAGES. LESS CELEBRATED IS THE VIBRANCY OF ITS MORE URBAN CENTRES. STRATEGY DOCUMENTS REFLECT THIS SELF-IMAGE, BUT A SPECIFIC STATEMENT OF COMMITMENT TO ENHANCING AND DEVELOPING WELL-DESIGNED PLACES WOULD BOTH STRENGTHEN AND BROADEN THE COMMITMENT TO DESIGN QUALITY.

Growth presents a challenge to planners and others working in the built environment. In particular bland suburban development is seen as the biggest threat.

Suffolk councils have shown that when they lead development, they can produce some exemplary schemes and there is a challenge to ensure that all public-sector-led development achieves the same high standards. There is an urgent need to update highways guidance to reflect the positive aspirations

As one might expect in such a diverse county local authority policy and practice in relation to design is mixed. There are some examples of good practice and some acknowledged areas of weakness. Staff

have shown a hunger for further engagement with, and training in, design issues and elected members have a commendable interest in design. Further discussion and training could enable them to play a stronger role as design leaders.

The challenge for the Suffolk Design is to explore what positive role shared policies, procedures and initiatives at a County level can play and decide which are appropriate to take forward. It can also help to create much easier ways to navigate the plethora of policy, standards, guidance and studies that impact planning and development across the County.

3 CORPORATE COMMITMENT, IMAGE AND IDENTITY

A range of strategies are developed and implemented at a County level, either by the County Council, jointly by local authorities or by wider partnership boards.

Suffolk's Framework for Growth (draft 2018) integrates employment, housing and infrastructure needs of the County. It is a forward-looking document focussing on the elements of physical growth that are needed, rather than dwelling on the County's existing qualities. However, it does express the need for sustainable growth which protects and enhances environmental and landscape assets.

Suffolk Growth Strategy (2013) quotes from an older strategy Transforming Suffolk, Suffolk's Community Strategy (2008): "By 2028, we want Suffolk to be recognised for its outstanding environment and quality of life for all; a place where everyone can realise their potential, benefit from and contribute to Suffolk's economic prosperity, and be actively involved in their community."

The above sentence places 'outstanding environment' at the forefront of what makes Suffolk an attractive and successful place. The Growth Strategy vision for 2028 sees Ipswich as a 'thriving cosmopolitan town' but states that 'Suffolk still retains its rural identity. Suffolk's approach to growth has protected and enhanced its rich landscapes and wildlife. Its market towns have healthy and thriving communities.'

This understanding has been reaffirmed by the fact that it is the Growth Programme Board that is leading on Suffolk Design.

Creating the Greenest County, although mainly focussed on sustainability and climate change issues, provides another shared acknowledgement that the natural environment is a treasured asset of the County.

Suffolk Local Transport Plan (2011) recognises that "Much of the county has a high quality built and natural environment which is valued by residents, visitors and businesses.".

Health and wellbeing are major areas of public concern and the Suffolk Health and Wellbeing Board leads on this work in the county. However, activity around health and wellbeing tend to focus on services, campaigns and facilities rather than the creation of healthier environments.

Local strategies

At district level local authorities have strategies that sit above, or alongside, the local (spatial) plans. For example the West Suffolk Strategic Framework 2018 which includes a large section on the council's role in 'transforming local places'. East Suffolk's Economic Growth Strategy sees 'outstanding landscapes' and 'heritage assets' as key to the district's economic success.

Each of these strategies, or strategic initiatives, provides an insight into the county's self-image. The natural environment and picturesque historic settlements and quarters are seen as key assets and selling-points for the County, as is the vibrancy of more urban centres. As in other places, there is a danger that infrastructure, in the form of workplaces, transport infrastructure or even some public buildings is seen as outside that aesthetic realm, although there are some good examples of such buildings and structures.

From reviewing these strategic documents, it is clear that while there is a strong general commitment to environmental quality as a key positive feature of the county, there is a lack of a clearly articulated, high-level, strategic commitment to design and placemaking from which other policies, strategies and initiatives can cascade.

4 THREATS AND CHALLENGES

Suffolk is entering a period of considerable growth as the draft Framework for Growth makes clear. Working within the Government's revised National Planning Policy Framework (NPPF) and the new national approach to determining the number of homes needed in each location across England (Objectively Assessed Need figures, OAN), Suffolk's councils will allocate land to deliver 66,015 new homes. 27,000 of these will be in 12 major locations but the fact that 39,000 will be accomodated in smaller sites underlines the importance of such sites within a predominantly rural county. 10 major employment sites are being developed on some 150 ha of land. Over 50 major infrastructure projects are planned as well as 27 new schools and a new hospital campus.

Through the various meetings local authority officers articulated what they saw as the main threats and challenges facing the built and natural environment of the County. Most of these were focussed on housing development but the figures above underline the need to pay attention to the design of non-residential development as well.

Perhaps the major threat was identified as 'creeping suburbanisation' where the character of historic villages can be eroded by unsympathetic bolted-on estates creating disconnected and car dependent neighbourhoods. New housing developments were seen as 'estates' lacking in their response to the landscape or historic context, failing to extend the urban fabric in the way settlements have done historically, and imposing standardised solutions in terms of architecture, street design and layout.

Other issues included

- the ageing population;
- rural areas with low provision of services;
- few local employment opportunities and poor public transport;
- employment base in need of diversification;
- over reliance on private car for transport;
- historic and environmental assets in need of protection;
- coping with the effects of climate change;
- the need to promote healthy, active lifestyles;
- integrating affordable housing;
- highways and parking;
- how to preserve and improve biodiversity.

There is a major challenge around the notion of local character and how new developments can respond to it, reflected in debates about whether 'pastiche' was as a negative or a neutral term. There seems to be a widespread need for greater discussion and appreciation of the range of approaches that can be taken to design in historic environments.

5 COUNCIL-LED DEVELOPMENT

Councils at county and district levels frequently act as developers, commissioning public buildings and public realm schemes and, in the case of West Suffolk's Barley Homes, housing.

Where the council acts as developer there is also still a role for the planning authority who should exercise the same level of scrutiny as they would towards a private developer, but we need to look separately at whether the public sector is a 'good client'. One might question whether council-led development should be of a higher quality than what we would expect from any developer, particularly so when

engaging in joint enterprises with the private sector. We would suggest that councils have a duty to set the standard for design quality in their areas as to do otherwise undermines their efforts to demand higher standards as planning authorities.

There is clearly good practice in the delivery of public-sector-led development. For in West Suffolk report:

We follow the same procedure as would be required for a private developer where a masterplan/development brief approach is required, and design always has a significant role.

On a commercial level, we worked in partnership with a cinema operator to develop an edge of centre cinema complex in Haverhill, which would broaden the linear retail dominated town centre and introduce a family orientated evening economy. The brief was for a contemporary building which would be instantly recognisable as a cinema. Working closely with the architect we achieved an iconic modern building which fully met the brief and achieves its objectives.

We are currently planning a multi-million pound development at Western Way in Bury St Edmunds which would see health, leisure, and education services brought together on one site under the Government's One Public Estate Programme. We are also redeveloping the former post office in Bury St Edmunds with a scheme intended to deliver new homes and commercial floorspace together with significant improvements to the public realm to address issues raised during the preparation of the Bury St Edmunds Town centre Masterplan.

In Mildenhall the council is currently developing the Mildenhall Hub, a joint venture with Suffolk County Council to deliver a new secondary school, library, leisure facilities, health centre, police and local authority offices.

Do these good examples represent a consistent pattern of design-led public sector procurement across the County? It would require a more comprehensive audit to find out, but we suspect there may be instances where technical requirements and budgetary considerations overshadow design and place-making concerns. There is a need to find ways of ensuring that public bodies in Suffolk are consistently good clients.

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Similarly Workshop 1 heard about the Milton Hill development on the former council offices site in Woodbridge led by East Suffolk. This will deliver a high quality and consciously contemporary development which was car free, made efficient use of land, opened up pedestrian links through the site, provided views to Sutton Hoo and the AONB, improved the setting of a listed building and created new public spaces.

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6 COUNTY COUNCIL FUNCTIONS

There are a number of County Council functions that have a major impact on design in the built environment. In particular the County controls or influences issues (highways, SuDS, rights of way) that should be decided early on in the design and planning process as they can have an impact on the proportion of land within a site that is developable and hence its viability. However, they should also not be decided in isolation from other place-making issues which are the preserve of the local planning authorities otherwise aspects of the design of schemes can get fixed in ways that are less than ideal.

6.1 Highways

The Highways team in Suffolk are committed to contributing to the creation of well-designed places. Indeed, West Suffolk report that: We work closely with SCC Highways and Transport teams on most developments and have a shared understanding of the importance of rebalancing streets in favour of pedestrians, and the role of innovative street design in placemaking, encouraging social interaction and reducing car dependency.

They are hampered by the fact that the guidance they work with is severely out of date. The existing Suffolk Design Guide pre-dates Manual for Streets having been most recently updated in 2000. The Suffolk Manual is of a similar vintage but is still presented on websites as current policy. Joint parking standards were produced jointly be the planning authorities in 2002 and County guidance in 2014 but needs to be reconsidered in the light of changes to the NPPF. Other minor guidance documents are very dated and do not reference new materials and techniques.

The Highways team deal with this pragmatically by using existing guidance selectively while drawing on national documents such as Manual for Streets. This is a far from satisfactory situation as it means that clear guidance is not accessible to those considering developing in Suffolk and outdated guidance is presented as current and may lead to the design of developments starting out on the basis of inaccurate information.

As with all Highways departments a lot of advice to developers and planners is strongly influenced by consideration of future maintenance budgets. This includes discussions as to materials and tree-planting. Clearer design standards would counter-

balance this tendency and establish a base level at which maintenance budgets need to be maintained. Senior planners felt that new guidance would be an opportunity to find solutions to the 'maintenance costs dilemma'.

6.2 Sustainable Drainage Systems (SuDS)

The Suffolk Flood Risk Management Strategy articulates design principles for all water management. Of particular relevance are Appendix A – the Design Guide for SuDS in new developments and Appendix C – a protocol for planning authorities and developers which both provide comprehensive guidance for those designing major schemes in both suburban and urban contexts.

The County SuDS team felt that this strategy is having a positive effect with some developers. It is not possible to evaluate to what extent awareness or take up of this guidance is consistent, but it is a good example of the type of guidance that a Suffolk Design web resource could make more widely accessible.

There are inconsistencies in the adoption of SuDS features with some districts willing to adopt them if they are part of the public open space, others not. This is an area where agreement to a common approach would be very helpful.

Planning officers identified a further issue is the lack of technical expertise in the industry to implement more progressive (i.e. surface/nature-based) SuDS solutions. Ravenswood was identified as a development with a successful drainage strategy complemented its and landscape design.

6.3 Rights of Way and green access

The County Rights of Way/Green Access team saw the development of new guidance as a timely opportunity to lay down principles for green access. The variation in attitude to green access and the use of CIL to support it between districts was seen as problematic.

It was seen as important to establish a hierarchy as to the preferred way of dealing with existing rights of way across sites and pedestrian/cycle desire lines more generally. The default standard would be the route being at the centre of a wide green corridor with an all-weather surface and good overlooking. The relationship with wider walking and

cycling networks and the need for wayfinding and interpretation would also need to be covered and would help identify circumstances where off-site contributions need to be secured. The reluctance of applicants to look beyond the red line was seen as a problem.

We discussed the potential of Local Cycling and Walking Infrastructure Plans (LCWIPs)as a model as to how the network might be planned and resourced.

7 PLANNING POLICY

Planning policy provides the bedrock for any ambition to ensure good design in the built environment. Ideally design ambitions and policies are not just found in the 'design' section of local plans and in design SPD (although these are important) but are articulated as a central driver of local plans and permeate other sections. The NPPF places an emphasis on design policies providing certainty for applicants and workshop 1 identified the need for robust planning policies and for specific policies to deal with particular types of development, site or issue.

There is a general issue of design policies being too generic and not reflecting local conditions, deficiencies or lessons learnt. The DPOG/DMOG meeting recognised that the policies of Suffolk authorities sometimes demonstrate this failing. They also felt that there was a need to communicate design policies more positively and the new emphasis on certainty in the NPPF provides an opportunity to do that. Design policies may also have unintended consequences, such as measures to prevent coalescence stifling the growth of villages.

Suffolk effectively has 4 local planning authorities with Ipswich plus three sets of two authorities at different stages of joint working or merger. So below we review the policy situation for Babergh and Mid Suffolk, East Suffolk, Ipswich and West Suffolk. Additionally, we looked at the Broads National Park Authority which has planning authority status.

The table below from the draft of Suffolk's Framework for Growth outlines the current position regarding the development of local plans:

Authority	Type of Document & Timescale Progress	Progress
Waveney District Council	Local Plan 2014 – 2036	Currently in development, anticipate adoption in late 2018
Suffolk Coastal District Council	Local Plan 2014 – 2036	Currently in development and working with IBC & BMSDC to align plans. Anticipate adoption in late 2019
Ipswich Borough Council	Local Plan to 2031 (ext. to 2036)	Adopted plan to 2031 & under review to extend to 2036 and align with SCDC & BMSDC's new plans. Anticipate adoption in late 2019
Babergh District Council / Mid Suffolk District Council	Joint Local Plan 2014 – 2036	Currently in development and working with SCDC / IBC to ensure alignment. Anticipate adoption in late 2019.
Forest Heath District Council	Local Plan to 2031	Single Issue Review (SIR) and Site Allocations Local Plan (SALP) adoption expected early 2019
St Edmundsbury Borough Council	Local Plan to 2031	Will develop a new West Suffolk Local Plan as Forest Heath and St Edmundsbury become a single council in 2019.
Suffolk County Council	Minerals & Waste Plan	Anticipate Examination in 2019 and then adoption

7.1 Babergh and Mid Suffolk

Babergh and Mid Suffolk have a joint Chief Executive and integrated staff structure. A joint local plan is in development with preferred options originally due to be published in the summer of 2018 but setback by the changes to housing calculations in the revised NPPF. The local plan has a target for adoption of December 2019.

There is no specific joint design guidance at the moment.

Babergh does not have any specific design SPD but design issues are emphasised in parts of the current local plan (June 2006):

The Built Environment and Conservation: in particular policy CN01 has a strong emphasis on local distinctiveness.

Environment: using the term in its commonly used sense to mean the natural environment, water and air quality, etc. rather than the built environment

Housing: where there is significant emphasis on sustainable patterns of housing development and good design, including increased densities (although the emphasis on avoidance of harm in certain policies may discourage increased densities).

The Mid Suffolk Core Strategy was adopted in September 2008 and updated via Core Strategy Focussed Review in 2012. This aimed to bring it into line with the (2012) NPPF. Policy FC 1 emphasises local character. References to design in the original document are sparse and generic.

Babergh and Mid Suffolk adopted joint landscape guidance in 2015 to be used in conjunction with the Suffolk Design Guide – despite that document being severely dated. It focusses on reducing the impact of developments and maintaining rural character and provides an analysis of the two authorities' various landscape areas.

The latest available consultation document has a section on Landscape, Heritage and Design. This references the outdated Suffolk Design guide and, at this stage, is lacking in detail.

7.2 East Suffolk

From 1st April 2019 East Suffolk becomes one council following a merger of East Suffolk and Waveney. However local plans remain separate for now and have different timescales for adoption (see above).

The Suffolk Coastal draft plan includes design policies which emphasise innovation and inclusivity as well as policies on residential amenity, historic environment and non-designated heritage assets.

The new Waveney Local Plan Issues and Options document contains a number of sections with strong design elements and recognises that design is a major issue for those who have commented during the plan's development.

7.3 Ipswich

Preferred options for the extended local plan were published in summer 2018, the target for adoption is December 2019. The existing local plan requires high standards of design as its first objective. Although focussing on the technical and spatial aspects of housing and other delivery many of the policies have strong design elements. In addition, there is the specific Design and Character policy and Tall Buildings, Heritage Assets and Conservation, and Buildings and Structures of Townscape Interest policies.

7.4 West Suffolk

West Suffolk have undertaken an extensive review of the implications of the new NPPF on our planning policies and DPDs. The supporting text of e.g. Policy DM22 - Residential Design is now out of date, and the new NPPF will be a guide for new policies in the new West Suffolk Local Plan.

7.5 Broads National Park Authority

Local plan examination in public summer 2018, target for adoption December 2018

BNPA have design guides that cover biodiversity enhancements, moorings, riverbank stabilisation, landscape and landscaping as well as waterside chalets/bungalows.

They also have landscape studies: The Landscape Character Assessment: and Landscape Sensitivity Study

There are areas where BNPA intend to produce further bespoke topic specific guidance to help with the new Local Plan policies. For example, peat, light pollution and residential moorings.

They have a current adopted design policy, and this is improved in the emerging local plan. This policy has had success in refusing inappropriately designed schemes.

8 SITE SPECIFIC PLANNING

A KEY ELEMENT OF PRO-ACTIVE PLANNING IS THAT LOCAL AUTHORITIES TAKE THE LEAD IN SETTING OUT DESIGN ASPIRATIONS AND REQUIREMENTS FOR ALLOCATED SITES THROUGH SUCH INSTRUMENTS AS SITE VISIONS, MASTERPLANS, DEVELOPMENT BRIEFS AND DESIGN CODES.

Resources are an obvious problem in adopting such approaches and in some parts of the country this has been 'solved' by asking land promoters and developers to develop briefs for their own sites for the local authority. This often leads to an unsatisfactory process where the brief is produced in parallel with the developer's masterplan and the two documents simply reflect each other.

Workshop 1 concluded that where resources are an issue it should not be used as an excuse to have no guidance regarding allocated sites; a light touch approach which develops principles and a framework for a site is better than nothing. Reviewing the options for a site can be good exercise to identify the optimum design strategies.

Current practice in West Suffolk seems to be exemplary in this regard. As they report:

West Suffolk has adopted a proactive system whereby significant or complex sites require the preparation of a masterplan or development brief prior to the consideration of a planning application.

Latterly, this has involved a whole development team approach including public participation from a very early stage to identify issues and opportunities which can ultimately inform and shape development. Earlier examples of a development team approach can be seen at Moreton Hall, Springfield Road and Southgate Street in Bury St Edmunds, Parkway and Hales Barn in Haverhill. More recent examples involving public participation from the outset can be found under construction at Marham Park, Bury St Edmunds and Moreton Hall. On a smaller scale, the redevelopment of a brownfield village site in Horringer transformed what was originally submitted as an executive housing proposal into a natural extension of the village, recognising its key characteristics and form.

Babergh and Mid Suffolk also have a portfolio of site-specific policy and guidance. SPD was produced by Babergh for the Hamilton Road Quarter of Sudbury in February 2010 while Mid Suffolk have produced development briefs for five major sites over the past five years.

Ipswich have developed a series of urban character SPDs for areas of the city not covered by conservation area appraisals and management plans with the aim of creating a comprehensive characterisation of the town.

The Suffolk Coastal draft plan includes a large number of area specific strategies.

9 COMMUNITY AND STAKEHOLDER ENGAGEMENT

At the first workshop concern was expressed over the nature of community engagement around both council-led planning and development and private-sector led developments. There are undoubtedly examples of good practice in Suffolk and sometimes extensive consultation but there is sometimes a gap between consultations and outcome which raises questions about the role of professional designers. This 'gap' was mentioned in relation to the Milton Hill scheme which we have highlighted above as an otherwise good example of council-led development.

It is important to distinguish between the over-lapping processes of community and stakeholder engagement, the former involving local residents and business owners, the latter representatives of public bodies, business, interest groups and activists. Both are important and necessary. It is also important to distinguish between community and stakeholder engagement in pro-active planning and around particular applications. The former is likely to be more successful than the latter as it can take the form of genuine community-led planning focussing more on the opportunities to shape the future of a place rather than the potential harm of a particular scheme.

An example of stakeholder engagement is the former Unilever Site in Needham Market where

Babergh and Mid Suffolk Council set up a place-shaping group to guide the evolution of the scheme. On a more long-term basis Ipswich Conservation and Design Panel is a local consultation panel consisting of representatives of amenity societies, professional bodies and business interests. It meets monthly and is seen as valuable in feeding in local knowledge to the design and planning process. Workshop 1 identified a key role for the district council as a mediator between developer and parish councils.

West Suffolk claim successes in community engagement at masterplan stage which is significant in reducing the number of objections to planning applications. This is done mainly through the developer via drop in sessions and exhibitions.

However, at the first roundtable a number of officers reported widespread resistance from residents and felt there was a wider need to explain the necessity for growth, and how it would happen over a much longer timescale. One officer reported that their

team 'collaborated like crazy' and then found that older residents with nice houses came forward and opposed development anyway. Our speaker from a volume housebuilder was also critical of the reluctance of planning officers to participate in public engagement events. Perhaps this is simply down to lack of time, but may also be to do with lack of confidence in dealing with public engagement, such events being seen as difficult and confrontational.

There is clearly a need for more skill, confidence, guidance and consistent approaches to community and stakeholder engagement. Statements of Community Involvement are intended to provide the policy framework for community engagement over plan making and planning applications. Some Suffolk authorities such as Babergh and Mid Suffolk and Ipswich have recently updated theirs. There may be scope for a common, and perhaps more challenging, approach to these documents.

10 APPLICATION PROCESS

Workshop 1 identified the need for consistency of approach in dealing with planning applications both within and between the different authorities. This is reinforced by the emphasis on certainty in the new NPPF. However, it is inevitable that seven becoming four local planning authorities will have developed different practices over time.

10.1 Validation

Validation is a part of the planning application process that does not receive the attention it deserves. It is often seen as a purely technical aspect of the process. However, it was identified as a useful tool during Workshop 1. It can be helpful in promoting good design in two ways:

It can ensure that the necessary plans and drawings are supplied to the scope and level of detail required. This effectively filters out some poor applications as the worst applications are often submitted with inadequate documentation. This can encourage developers to commission more competent design consultants.

Validation requirements can drive pre-application behaviours, even where applicants do not participate in pre-application discussions. For example, at Newcastle-under-Lyme council the validation checklist is used to ensure that applications over a certain size have been to design review before being submitted and that

the applicants have detailed their response to the panel's recommendations.

All validation checklists will need to be reviewed to reflect the new NPPF. This is an opportunity to make sure they are contributing to design scrutiny and may be an opportunity to develop a consistent approach across the county.

10.2 Pre-application discussions

Practice regarding pre-application discussions varies with some authorities charging and some not and different relationships with the County Council.

West Suffolk encourage and charge for pre-apps. As they are charged-for we endeavour to treat them with respect, in a commercial manner. Design is plainly an issue for consideration at this stage, and officers are encouraged to comment on design, seeking advice where appropriate.

Babergh and Mid Suffolk also charge and uniquely have a memorandum of understanding with Suffolk County Council to enable them to benefit from a proportion of the fees.

East Suffolk do not charge for pre-app process but feel that they have improved the process, working well with the County and creating a positive collaborative relationship with developers.

Broads National Park Authority do not charge for

pre-application advice. Design issues are one of the main reasons people ask for free pre-app advice. There are limits to pre-app advice due to resources and the time available depends on the scale and complexity of the scheme.

The development community report that paid-for pre-app does create expectations as to the level and consistency of service they are going to receive, and frustration if that does not happen.

10.3 Outline Applications

The practice of outline planning applications and permissions is well established and has benefits for landowners/developers and the local planning authorities in providing financial uplift and certainty. The status of indicative masterplans does create issues for developers however as sites may be sold on with an indicative masterplan but there is no certainty as to whether that plan has the support of the local planning authority. Too often 'indicative' or 'illustrative' masterplans are not discussed in detail but then become fixed, or at least are used to set key structuring elements of the proposal such as access and spine roads. It may be beneficial to discuss on a joint basis how the outline process could be more effective in producing good design outcomes. This may include making clear the status of any indicative masterplan so that it can be given appropriate weight.

10.4 Planning performance agreements

Use of planning performance agreements is not widespread in the county but may become more so as the major sites mentioned above come forward. There is an opportunity to establish milestones and gateways within a PPA process at which design is considered and 'signed-off' including design reviews.

West Suffolk report that they entered into their first PPA this year for a reserved matters phase of a strategic housing development in Bury St Edmunds. The LPA is looking to encourage the use of PPAs as a way of further improving delivery. The initial PPA did not include any specific measures for validating and or improving design. However, the agreement built in dedicated time to consider the scheme pre and post submission with time built in to the process to improve the design where necessary. Working closely in this way with sufficient time to assess and feedback on design issues has resulted in an improved design in that particular case.

Using the PPA to help improve design is something the LPA will be looking at as we seek to encourage the use of PPAs more generally. Including the use of Design Panel review either pre or post submission would be one measure for achieving this. Accounting for dedicated Urban Design Officer time within the PPA (as we now have such an Officer in post) would be another way to achieve this.

10.5 Design Review

Use of design review across Suffolk is inconsistent and workshop 1 reported varying success with using the RIBA Suffolk Panel and frustrations with a lack of consistency.

East Suffolk report using the RIBA Suffolk Panel for paragraph 79 houses stating that it gave their planning committee some comfort regarding decisions but have misgivings about the lack of consistency in the panel.

West Suffolk use it in circumstances where the planning process reaches a state of impasse between the parties. This can be at planning application stage, or the masterplan/development brief process. Originally, they used the CABE Design Review Panel, but now use the Suffolk Design Review Panel (RIBA). The Council also took the Mildenhall Hub planning application to the panel for independent review. In all cases, the review is funded by the applicant.

There has been some historic use of the DSE panel by Babergh and Ipswich.

10.6 Other tools and guidance

Specialist and non-specialist officers in Suffolk use a variety of tools and guidance to help them with their work including:

- Building for Life 12
- Car parking: what works where?
- Manual for Streets 1 & 2
- Building in Context
- The Urban Design Compendium
- Secured by Design
- Landscape Character Assessments

Some reported using documents that are now quite dated and some from other planning jurisdictions. County Highways reported taking a pick-and-mix approach between outdated local guidance and Manual for Streets.

Suffolk Coastal and Ipswich new local plans specifically reference BfL12 within the policy.

This highlights the need to evaluate what specific new guidance needs to be developed or what third party tools and guidance might be endorsed or at least identified as useful.

10.7 Post-completion reviews

Workshop 1 highlighted the importance of feedback and monitoring of existing development. This can take the form of specific monitoring of completed schemes against criteria such as Building for Life 12 or more informal tours of completed schemes for councillors and/or officers. A consistent approach to monitoring and evaluation of completed developments could be developed across the County.

11 PEOPLE

THE SUFFOLK GROWTH PROGRAMME BOARD IS CURRENTLY DEVELOPING A LONGER-TERM WORKFORCE STRATEGY FOR SUFFOLK'S PLANNING, GROWTH AND DEVELOPMENT TEAMS TO ENSURE THEY HAVE THE CAPACITY AND SKILL SETS ACROSS SUFFOLK NEEDED TO WORK IN PARTNERSHIP WITH COMMUNITIES AND INDUSTRY DELIVER OUR PLACE SHAPING DEVELOPMENTS. A LARGE PART OF THIS NEEDS TO FOCUS ON THE CAPACITY OF STAFF TO DEAL WITH DESIGN AND PLACE-MAKING ISSUES AND HOW THEY INTERACT WITH OTHER AREAS OF RESPONSIBILITY.

That capacity lies within specialist officers in urban design, conservation, landscape and ecology but also in the ability of generalist staff to routinely deal with design matter as the central core of their jobs.

Ipswich have a conservation and urban design team as do East Suffolk. West Suffolk have a Senior Urban Design Officer, a Principal Building Conservation Officer and Senior Landscape and Ecology Officer. Specialisation within Babergh and Mid Suffolk is concentrated in the heritage service. A number of authorities acknowledged that 'conservation and design' staff were mainly from a heritage background. The workforce capacity study needs to assess whether this is sufficient and whether there might be any benefits from sharing this capacity.

The situation regarding the capacity and skills of generalist officers is more mixed and influenced by high levels of turn-over. Sometimes turnover of staff can be positive, bringing in staff who have previously worked for better resourced urban authorities. The DPOG/DMOG group recognised that whatever specialist staff an authority has it was important to have planning officers with a certain level of design skill and knowledge to 'maintain the design conversation'.

We are emerging from a period of limited resources when training budgets were often seen as something that could be cut so design related training in recent years has been limited. There has been some in-house training and some officers have benefitted from training from the Urban Design Group and Anglia Ruskin University. There was strong interest in a more comprehensive programme of CPD.

11.1 Councillors

At district and borough level design is a high priority for elected members and they recognise and encourage any process which can lead to a high-quality environment.

Elected members main concern is often development which appears 'cramped' or is dominated by cars parked on the highway. Elected members often identify this as a result of high density rather than poor design. However, there have been some very successful high-density schemes which are not cramped approved by members.

West Suffolk report that elected members play an important part in the masterplan/ development brief process, both in the preparation and engagement process and adoption of the final document

Most authorities try to encourage member engagement with the planning process, but they do report the commonly held frustration that councillors may see their main source of power in planning as being the ability to say 'no' rather than influence schemes earlier. There are some instances of members overturning officer recommendations on design grounds although the extent of this varies considerably across authorities. This often leads to the authority subsequently losing appeals.

At the County level members do not strongly engage with design issues. The strongest issue for them is highways, but more in terms of traffic flow and parking than street design and connectivity issues.

12 SUMMARY OF FINDINGS AND RECOMMENDATIONS

OUR ASSESSMENT OF HOW SUFFOLK CURRENTLY MANAGES DESIGN IN THE BUILT ENVIRONMENT LEADS US TO IDENTIFY THREE PRINCIPLES THAT SHOULD GUIDE THE FURTHER DEVELOPMENT OF THE SUFFOLK DESIGN INITIATIVE: COMMITMENT, CLARITY, AND CONSISTENCY

Commitment at all levels to design as a driver of the County's success.

Clarity of purpose in expressing that commitment and in communicating what is required to achieve successful places.

Consistency of policies and practices across Suffolk, as much as is possible consistent with the diverse nature of the County.

12.1 A high-level commitment to good design

Findings: we found that while the commitment at the highest levels to quality of place as a key driver of the success of the County is clearly visible, it could be more explicit and broader.

Recommendation: A statement from senior public leaders of the commitment to good design in the built environment would help to provide a context and rationale for other measures. Such a statement would need to look beyond the preservation of natural and historic environments and articulate how that legacy could be built upon through a commitment to consistent best practice in design and planning processes and outcomes. It would express an ambition for new housing, infrastructure, employment and leisure developments to be as attractive and successful as the County's best-loved historic towns, villages and landscapes.

The recent Manchester Design Manifesto is an example of a high-level public-sector commitment. In this case it goes beyond design in the built environment and is therefore longer and more detailed than anything we would want to propose for Suffolk.

12.2 A 'good client' standard for public bodies

Findings: Suffolk authorities have shown that they can demonstrate best-practice as developers and to optimise the quality of buildings, spaces and infrastructure that are at the heart of communities. We cannot be certain that this good practice is consistent.

Recommendation: A shared standard should be scoped for council-led development and procurement would help to ensure that best practice becomes standard practice throughout Suffolk.

12.3 Shared planning procedures

Findings: there was not necessarily a strong call for common planning procedures across the Suffolk authorities, but we know that the adoption of similar ways of working in planning can provide certainty for developers, save resources for councils and enable expertise to be developed and shared more easily.

Recommendation: the scope for shared planning procedures should be assessed.

Among the areas of practice that could follow a common standard across the county are:

  • Validation checklist

  • Pre-application practices

  • Use of design review, including development of a new Suffolk Panel

  • Adoption of Building for Life 12

  • Common standards for community engagement

  • Common standards for monitoring and evaluation of planning outcomes

12.4 County-wide policy and guidance

Findings: Some policy and guidance already exists which is county wide, mainly that which relates to County Council functions. While some has been subject to recent updating, other guidance, such as the highways elements of the Suffolk Design Guide are well out of date.

Given the diversity of the county it is questionable whether there is a useful role for general design policy at a county level. Is there a gap between the NPPF and district policies, into which county level policy can fit? At the very least such high-level guidance would provide a framework for the alignment of design policies and procedures across the county. It would be likely to be more heavily focussed on design process issues than design outcomes. Apart from the test of usefulness such an exercise would only be worthwhile if the shared guidance were to be adopted by all planning authorities. Is this politically possible?

Recommendation: A process needs to be established, perhaps through a new task group, or an existing group, for auditing this guidance and

setting priorities for what needs to be updated. It could be that some of this work could be carried out as part of the current Suffolk Design initiative.

At the same time perhaps initially via a workshop, an exercise could be undertaken to explore how shared county-wide policy and guidance might be useful and assess whether and how quickly it could be adopted.

12.5 Local and subject-specific guidance

Findings: Below the county-level policy and guidance there is a large quantity of local and subject specific policy, guidance and background studies that have the potential to be used by planning applicants and officers assessing applications. These cannot be easily accessed and their scope, status and how up to they are is often unclear. Design has to be based around knowing what you are dealing with, the context of resources, character, adjacencies etc. this needs proper background information and data.

A web-based home for these resources is an output of the Suffolk Design project that we have discussed from the outset. Those who are intending to develop in Suffolk and their design teams should be able to easily access all the documents they need to understand the policy background, standards, guidance and contextual information.

Recommendations: We need a process for assessing the scope, status and up-to-date-ness of each document. A web-based resource could

be created, probably using a tab-based system could provide that service. It could be developed over-time and updated regularly. This raises a question of ownership and resourcing the update process into the future.

More ambitiously, an integrated resource using GIS could be set up to understand what Suffolk has and is, the base data from which sensible decisions can be made. We will be covering this in more detail in topic paper 3.

12.6 Shared CPD

Findings: So far Suffolk Design has only provided a taste of the potential of shared CPD for training and networking. Further events and tours are to come. However, it does show what is possible and there is clearly a hunger for more staff development around design issues and a clear need to raise skills, capacity and confidence at dealing with design issues.

Recommendations: That a scoping exercise be undertaken into how a shared CPD programme might be developed and sustained in Suffolk. There is an issue that Suffolk only has five local authorities (compared to Kent where there are 13) and so the fund that could be created by each making a small contribution is less. However, the private sector could make a substantial contribution, and we might consider broadening the programme to include neighbouring areas. An obvious extension would be to Norfolk to align with the LEP area.