

## London Plan Written Representation

<b>Ministry of Housing Communities and Local Government (MHCLG)</b>	<b>Reference ID 2631</b>
<b>Matter Title – Good Design</b>	<b>Matter no. 34</b>
<b>Matter Question (s)</b> M34. Would policies D1 and D2 provide a justified and effective approach to delivering good design? In particular: a) Would the approach to delivering good design meet the good growth objectives set out in policies GG1, GG2, GG3 and GG4? b) In light of the requirements of policies D1 and D2 would they be effective in achieving the level of growth envisaged? c) Would policies D1 and D2 provide an effective framework to protect the distinctiveness of different parts of London, with particular regard to their social, economic, cultural and residential characteristics? d) Would the approach taken to design scrutiny be justified and effective? Would the proposed use of masterplans and design codes, as set out in Policy D2D, help to bring forward development and ensure high quality design? Would the proposed use of design review, as set out in Policy D2F, be justified and effective? In this regard, would the policies deal with strategic planning matters? e) Bearing in mind the resource implications for boroughs in carrying out Policy D2A1-11, would it be effective? f) How would the policies be monitored, given the nature of many of the requirements? g) Overall, would the policies provide an effective and justified strategic framework for the preparation of local plans and neighbourhood plans and development management in relation to this matter?	

### General

1. The Mayor's approach to design is thorough in coverage and supportive of both the 2012 NPPF approach and the latest Government policy on design set out in the revised NPPF. However, the policies D1 and D2 are wordy and repetitive, with some fairly detailed requirements, this is likely to make it difficult to assess specific development proposals.
2. A better definition of 'good design quality' is recommended and where possible, condensing the content, for example "Architectural quality and materials should be of a high standard".
3. In response to Matter M7 the Government has questioned whether the Good Growth policies GG1-GG6 are useful as these appear to be broad objectives rather than policies and it is likely to be difficult to assess any individual planning applications against them.

c) Would policies D1 and D2 provide an effective framework to protect the distinctiveness of different parts of London, with particular regard to their social, economic, cultural and residential characteristics?

4. Policy D1 subsections A2) and A12) do not sufficiently emphasise local distinctiveness of the immediate surroundings in a local and Borough-wide, rather than London-wide context. The word "locality" may be better expressed as "surrounding area" or "district".

d) Would the approach taken to design scrutiny be justified and effective? Would the proposed use of masterplans and design codes, as set out in Policy D2D, help to bring forward development and ensure high quality design? Would the proposed use of design review, as set out in Policy D2F, be justified and effective? In this regard, would the policies deal with strategic planning matters?

5. It would be helpful for Policy D2 (or relevant supporting text or a cross reference to an external document) to set out the generic content of a typical design code to ensure that it is an effective tool.
6. The threshold for schemes required to have a design review process should be widened to include schemes that are “significant” rather than just be based on the scale of development.

Word Count (excluding Question and title/references) = 342 words