



Strategic Planning Team
Angus Council

By email only

17 September 2018

Draft Design Quality and Placemaking Supplementary Guidance

Dear Sir / Madam

Homes for Scotland are grateful for the opportunity to provide comments on the draft Angus Council Design & Placemaking Supplementary Planning Guidance 2018.

Homes for Scotland is the voice of the home building industry in Scotland, with a membership of some 200 organisations together providing 95% of all new homes built for sale across the country as well as a significant proportion of affordable housing.

Homes for Scotland is committed to improving the quality of living in Scotland by providing this and future generations with warm, sustainable homes in places people want to live.

We make submissions on national and local government policy issues affecting the industry. These submissions are endorsed by committees and advisory groups utilising the skills and expertise of key representatives drawn from our member companies.

General Comments

We consider that the review of successful places in Angus and consideration of the characteristics which contribute to this is useful and adds some helpful additional context to the Development Plan Policy. We consider that this could be a useful resource for urban designers in giving an understanding of what the Council considers to represent best practice.

We note and welcome that the design requirements set out in Section 5 will be applied considerately recognising that some will be more or less applicable to different developments:

“The applicability of the design requirements will vary according to the scale and nature of development proposals therefore a balanced application will be required. Whilst the requirements will be particularly relevant to new housing proposals, all forms of development will be expected to meet the design principles as appropriate.” (p. 20)

However, notwithstanding this qualification we consider that some of the requirements are too prescriptive and others would benefit from simplification as set out below.

Specific Comments

The first bullet point on p. 21 states that proposals will be expected to be laid out in a block structure with any deviation from this requiring justification. We consider that this requirement is unnecessarily restrictive and precludes consideration of other design approaches which have delivered successful attractive places. It therefore limits potential design solutions and it has not been explained why this gridiron approach to design has been elevated above other approaches. We would suggest this is instead included as a possible design approach which has been successful elsewhere in Angus rather as a specific design requirement.

Similarly, the fifth bullet point of p. 21 is highly prescriptive. We consider that the design of the site is best evaluated in the round with other considerations also taken into consideration. Such prescriptive policies therefore reduce the extent of planning judgment an Officer can use. This can prevent an officer from weighing up different elements of a development proposal and ultimately could make the delivery of new homes more challenging.

In relation to the third bullet point on p. 22 we consider that the requirement for a minimum garden size of 100sq.m is unduly onerous and would limit the style of houses which could be constructed. For example mews houses would not be able to achieve such a garden size and achieving this would also reduce the affordability of housing. Similarly, the requirement for the size of the amenity space to reflect the floorspace internally is not clearly explained and successful, attractive developments can be achieved without meeting this standard. We would suggest the appropriate garden size should instead be considered at the pre-application and application stage having regard to the specific context of the development.

In relation to the fourth bullet point on p. 22 we consider that this guidance should be incorporated into SPG to allow it to be subject to consultation. It would also help to simplify the Angus Planning framework by incorporating design guidance into one document.

In relation to bullet point 4 on p. 25 we consider the restriction on the use of cul de sacs is overly prescriptive. They could well be the only design solution for smaller developments and towards the edge of larger developments. We consider this sentence should be deleted.

We would also suggest that the document could be made more concise by removing reference to the need to comply with policies already in the development plan or other supplementary guidance on p. 24, 27 and 28.

Conclusion

Overall, we consider the document provides some useful additional guidance to assist developers and their design teams. In particular the case studies which are included are helpful.

However, we would caution against making policies too prescriptive as this can preclude the use of high quality design and make design solutions to more challenging sites harder to achieve. We would suggest that some of the most prescriptive guidance is removed as it goes into a level of detail that we consider would be best explored at the pre-application stage.

Yours Sincerely



Joe Larner
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