

Urban Design within Planning Appeals

Draft Feb 2007

This short paper examines some of the concerns, confusions and perceptions that London local authorities appear to have about how urban design issues are addressed within planning appeals. It has been written to aid discussion, and highlight some of the key issues.

Although it is based on comments made by local authority officers and members, and some appeal examples, it is not based on systematic research. It is also written from the local authorities' perspective, and does not comment on appellants' or inspectors' possible perceptions.

Issues addressed in this paper:

1. How important is design?
2. Consistent analysis
3. Design as an aesthetic issue
4. Functional design issues
5. References to policy
6. Balancing priorities
7. What happens after the appeal

Table 1 at the end of the paper includes extracts from some appeals to illustrate the points made. Table 2 examines all the issues addressed by an inspector within one appeal and asks if these are legitimate design issues.

Key questions arising from this paper are:

1. Do PINs feel that PPS1 design policies are usable, and are they being used? In particular is high quality being required outside conservation areas.

2. How do PINs feel design is being addressed in appeals? What would they like to see local authorities and applicants do differently?
3. Is it possible to pay as much regard to functional design issues as aesthetic issues within appeals?
4. How can we collect a dossier of appeal examples?
5. Would it be possible to have more consistency in the language and terms used to describe design issues within decision letters?
6. How should local authorities use responsive design guidance which might sit outside the LDF? Can this be given weight?
7. Are inspectors using design and access statements? Do these help at all? Can they?
8. Is the quality of the inside of a building a justifiable reason for refusing an application?
9. How influential is advice from a Design Review panel within an appeal?
10. Are standard reasons for refusal causing problems?

1. How important is design?

There appears to be a real feeling that an appeal decision is a lottery when it comes to design issues. Some authorities feel that the Inspectorate are very supportive of design based reasons for refusal, while others feel that inspectors will never reject an appeal on such issues. In some cases different officers within one authority may have different views, depending on their personal experiences. Then there can be a variance between councillors and officers.

Overall the perception seems to be that inspectors will not uphold design based reasons for refusal, and design is not important. As such local authorities are often very wary of refusing on this basis. When asked for examples to substantiate their perception some said they did not have any because they did not refuse on design grounds, because they would not win! So there may be an element of a vicious circle perpetuating common perceptions. However, authorities do watch what is happening in neighbouring areas, and there is an informal grape vine, possibly more likely to pass on 'bad news' where an authority loses an appeal, which again colours perceptions. There may be a difference in perceptions between central and outer Boroughs, but this is not clear cut.

There is also a feeling that it is possible to 'win' on design grounds inside conservation areas, but not in other areas. Therefore it is particularly hard to find examples which are not based on PPS15 related reasons for refusal. When asked if they would have refused the same poor quality development outside a conservation area, that they refused and won on appeal inside such an area,

some authorities say they would have just approve the application and have no expectation of winning on appeal in such a case. This seems contrary to the key design policy in PPS1, but maybe there just aren't enough well known cases based on the PPS1 test around yet.

Without either a clear indication from PIN's on how they view design, and/or a proper study analysing a representative sample of appeal decisions, it may be hard to change perceptions.

2. Consistent analysis

There seems to be a feeling that some inspectors are 'good' on design and others are not. This might mean some agree with the authority, while others do not! But more generally it is felt that PINs take an inconsistent approach to design issues. For example some inspectors will quote PPS1 policies, even if they are not referred to by the local authority, while others will ignore this national policy. Therefore some decision letters refer to the PPS1 requirement to improve an area, while others will talk about preserving the current character.

No one can deny that design can be a subjective issue, particularly where appearances are concerned, but some authorities do seem to feel that the weight given to visual impact varies from appeal to appeal. For example, in 2 appeals in conservation areas, one inspector felt that the appearance of the back of a building was not important, while another inspector felt that such issues should be considered, even if the back area was not key to the character of the conservation area. Obviously the circumstances of each appeal would have been different, but the message taken away by local authorities is confused.

Similarly, one central London Borough tells its DC staff never to refuse rear elevation proposals on design grounds in conservation areas, while a neighbouring authority feel that they invariably win in such cases. The second authority feel that people value areas as much from the view out of their windows as from walking down the street so impact should not just be assessed from the public realm. They say that this view has been upheld on appeal.

Urban Design London recently circulated the link to the urban design section of the Inspector's Handbook on PIN's website to all design officers and design Champions, This document clearly sets out how inspectors should deal with design, but it is often difficult to see how decision letters relate to the advice it contains. In particular, letters often do not seem to use the same language as the Handbook, and design issues covered in the Handbook are sometimes ignored within appeals.

One authority pointed out that the handbook deals with safety and security issues, but they have never seen an inspector's decision letter which upholds a reason for refusal based on these issues. They felt that design issues are often marginalised, and they often left out of design based reasons for refusal as they were seen as un-winnable.

It may be the structure rather than the content of decision letters which is colouring perceptions. It is understandable that they will vary greatly, but they often use different terms to cover design issues, or deal with them within a variety of paragraphs within the letter. For example the principles of good design and development forms described in By Design and referred to in the Inspector's Handbook, cover mix of use, layout, scale, density, public spaces etc. These issues are often key to an inspector's decision, but they are not always presented as 'design' issues. There is obviously a very blurred line between design issues and other planning issues, as PPS1 says, they are indivisible. But it may be that those who do not read a lot of decisions, or are not well versed in design, miss the design references. This obviously does not influence the decision, or probably further negotiations that may be based on the decision letter, but maybe it is influencing the perceptions discussed in this paper.

As such it might be helpful for decision letters to use a few key terms when they are covering design issues, and to show the relationship between physical forms, like there is no overlooking of public spaces, where retail uses are placed in the layout etc, and design objectives, like reducing crime and the fear of crime, or ensuring appropriate access to and viability of mixed use elements.

3. Design as an aesthetic issue

This point is covered briefly above, but it is worth exploring in a little more detail. Traditionally design has been viewed as an aesthetic issue. It has only been over the last 5 years or so that functional design issues have been discussed widely. This has meant that many officers and councillors have spent years thinking about design as 'what it looks like'. It would seem from appeal decision letters that many inspectors may also have this background, and primarily consider design to be about aesthetics.

In local authorities the urban design functions are often combined with historic conservation functions. Both require specialist skills, like conservation officers needing to understand historic building materials, and it is a lot to ask people to be expert in BOTH historic conservation and urban design. However there is some synergy between the skills needed for both jobs, particularly when appearance and aesthetics are being considered. This may help perpetuate a focus on aesthetic design issues in some

authorities. It seems, from the appeal examples looked at for this paper, that the appearance of development in historic settings is the most common 'design' based reason for refusal. This may be because of listed building legislation, conservation area status, and the well established policies in PPG15. Maybe other design issues, just don't have the same 'clout'.

It is hard to tell without doing a systematic survey, but from the few examples looked at for this paper, it may be that perceptions of lack of support and inconsistency in appeal decisions relate primarily to aesthetic issues such as how a new building would 'fit in' visually, that is how it relates to its surroundings in terms of scale, materials, colour, fenestration etc.

But PPS1, By Design and advice from CABI suggests that achieving 'good design' in terms of how a scheme 'fits in' greatly depends on the quality of the design process, and a good analysis of the overall local context, which should look at much more than local visual appearances. It might be very hard for inspectors to cover such issues within a succinct decision letter, but some reference to the quality of the design process, possibly gleaned from the design and access statement, as well as the design itself, may help.

4. Functional design issues

Recent national planning policy has stated the importance of good 'functional' design. All relevant PPSs state that design is about how a place works, and how it influences people's quality of life, access to jobs, homes, services, relationship with the natural environment etc. These functional issues relate to a list of policy objectives where good design can help ensure delivery. These objectives include creating safe places, inclusive places, successful places, places that can cope with changes in climate and flooding, optimising land use etc. Decision letters do not seem to be structured to cover functional design issues particularly clearly. For example layout, or density, or open space provision are often dealt with as separate issues, although they all work together and influence the success and appropriateness of places and are greatly influenced by the developments 'design'. They are as much design issues as materials used in a conservation area, but at the moment local authorities don't seem to think inspectors view them as such. This may mean that some local authorities do not think that the key tests in PPS1, like requiring good design, relate to these functional design issues.

If both authorities and inspectors could look at schemes as whole places, where the different physical aspects of a scheme come together to effect its likely performance as a place, it might be easier to explain that functional design issues are key to a very large number of appeal decisions and that good layouts, mix of uses, building and open space sizes etc are invariably important.

Sustainable design and construction is seen as an increasingly important part of functional design. However some authorities feel that they don't have the expertise to really assess the suitability of proposals against these criteria. This is not helped by generally aspirational local policies which can be hard to pin refusals to. Do PINs have any advice on this issue?

Another growing area of interest is the quality of internal spaces created by development. In particular more authorities are concerned over small, single aspect flats with long internal corridors and lack of outlook. How do inspectors view such issues? Would such concerns be seen as an appropriate reason for refusal?

5. References to policy

The inspector's Handbook offers clear advice on how PPS1 and By Design should be addressed. Presumably this will be updated to cover PPS3. Some decision letters refer to these documents and their key policies, others make no mention of them. It may be that they are quoted where the local authority has relied on them as part of their argument, but PPS1 design policies are likely to be relevant for most appeals where a physical proposal is under dispute. Consistent referencing to these key documents may help to change perceptions.

Local authority policies can at times be very woolly where design is concerned. They sometimes focus on aesthetic issues, or historic conservation. It is not clear when new LDF policies will be coming on stream in London, and there is concern as to where design policies will sit within the new structures. So for the time being many authorities may need to rely on London Plan and PPS policies, and probably should refer to them more in their reasons for refusal.

Saying that though, some authorities have detailed policies relating to streetscape issues, urban form/grain, plot sizes etc, and have won appeals on the basis of these policies. Conservation Area Appraisals are also found to be very useful and there seems to be a feeling that doing an urban design strategy is a worthwhile exercise. But not all Boroughs have the resources to do produce this depth of policy.

Some authorities have asked how inspectors will view 'policies' or guidance which sit outside the formal LDF. There is concern that it is sometimes hard to get design guidance and policies into LDS's and produced in a responsive manner. So there may be more 'unofficial' guidance around, like older design guides and briefs. How much weight will these be given?

Not really a reference to policy, but related, is the quality of reasons for refusal used. Some authorities say that they may be using too many standard reasons which are old, out of sync with policy, and which do not reflect functional design issues. Even where the authority may have very strong policies, they may be using old hat, land use based reasons. In some cases urban design officers draft reasons, which works well and helps appeals, but resources often mean this is not possible. It would be interesting to know if PINs feel standard reasons for refusal are a problem.

6. Balancing Objectives

Planning is about balance, often looking to optimise positive impacts from any development. Some authorities seem to feel that inspectors view design as of lower importance than other planning objectives such as housing number targets. If this is the case, then it would be useful for inspectors to clearly explain why. However if it is not, and no hierarchy of planning objectives is given in national policy, then it may be that inspectors are disagreeing with local authority assessments of design quality, rather than down grading the issue. If this does happen, the perception is that design is not seen as important rather than the inspector disagrees with the authority over the assessment of design quality. Once again this perpetuates the perception that inspectors will not uphold reasons for refusal on design grounds.

In central London in particular, there is concern that recent called in decisions have had a significant influence on what authorities feel able to refuse. In particular the Lots Road and Vauxhall Tower cases seem to have given a strong message that design quality is not very important, but getting a lot of homes built, whatever they are like, is.

Some authorities see a similar balancing within their own decisions. Urban design officers often seem to feel that they can not object to council own or social housing schemes, however bad they might be.

7. What happens after the appeal

A decision letter is often only the start of a long process of renegotiation and resubmission. The letter may be pored over minutely, with much discussion over the words or phrases used. Inspectors know this, and so take great care in what they say. But what they don't say can also be very influential. If an inspector talks about the inappropriate appearance of a scheme, but does not comment on whether it is legible, permeable, safe, inclusive etc, it can be very hard for the local authority to negotiate anything more than cosmetic improvements.

Obviously, if the local authority is concerned about functional design issues, it should have referred to them within the reasons for refusal, but sometimes one or two reasons are seen as sufficient, and little thought is given to what happens after the appeal.

It is not for inspectors to do the local authorities job for them, but if functional design issues do come forward as problematic, then it would be very helpful for the inspector to say so.

Conditions are vital to the eventual quality of new buildings. Local authorities may not spend enough time considering suggested conditions, and the inspector does not impose conditions relating to design. Therefore detailing from the original schemes is lost and the quality of the development is reduced.

Recommendations

To aid discussion, is it worth considering the following?

- Inspectors use consistent design based terms, maybe taken from the 7 key objectives in By Design?
- Inspectors make reference to the quality of the design process that has informed the application, not just the quality of the final design.
- PINs or other organisations search decisions on the basis of these consistent terms so that a better picture can emerge of how design is being addressed within appeals.
- Both local authorities and inspectors ensure they consider functional as well as aesthetic design issues. Maybe they could refer to the issues required to be covered in Design and Access Statements, and explain where the physical forms proposed would or would not help meet key planning /design objectives?
- A degree of subjectivity and variable analysis in terms of aesthetic issues should be expected. Local authorities should base their aesthetic designs on good character analysis and descriptions.

Table 1

The following table sets references from a handful of appeals against the issues discussed above.

Issue	Example	Example	Example
Balancing objectives	Listed former nuclear bunker in the green belt. Change of use allowed on appeal to residential, with glazed top 'box'. LPA presumes permission given because retention and re use of the listed building seen as most important issue, but says <i>'We now have a smart modern 2 storey house; smooth rendered to the outside (as approved on Appeal) lacking the qualities that made it Listable and therefore making the residential use in the Green Belt highly questionable. We also have two new Applications; one for an outdoor pool and the other for an indoor pool...'</i>	In an appeal where filling an ugly gap with a building was being weighed with the shortcoming of the proposed elevation design, the inspector said; <i>However, if this were the only fault in the scheme I take the view that it would be outweighed by the benefits of filling the gap in a generally satisfactory way. In short I consider that this, by itself, is not a sufficient reason to dismiss Appeal C.</i> It is unclear if this type of balance is truly inline with the objectives of PPS1, to ensure good design, not just 'its good enough' design. This appeal however, was dismissed.	Should PPS1 policy to improve an area reach beyond PPS15 policy to preserve it? In one appeal the inspector said; <i>'The design of Appeal Scheme C could be improved but, on balance and overall, its design is not so deficient as to outweigh the benefits of filling the gap. I therefore conclude that only scheme C would preserve the character and appearance of the conservation area.'</i> But does this 'good enough' decision fit with PPS1 policy?
Consistency	Redevelopment of suburban houses into a block of flats. Refused as unduly prominent.	In the same road, a few doors down, although on a corner, but surrounded by similar sized buildings, an appeal for redevelopment into a similar block of flats was approved. There it was argued that <i>'the buildings proposed would be somewhat bulkier, wider and deeper than other buildings on Manor Road but some such increase is to be expected if optimum use is to be made of previously developed</i>	Development in a conservation area, the inspector said: <i>'The rear elevation is less important than the front one but it is still within the conservation area and must be assessed accordingly.'</i> In another conservation area, another Borough a different inspector said that the back elevation, although

		<p><i>land in suitable locations. ‘</i></p> <p>So here the objective of optimising land use seemed to take precedence over local ‘character’.</p>	<p>in the conservation area, was not important.</p>
<p>Referring to policy</p>	<p>Extract from decision letter – no reference to PPS1 as part of the ‘development plan’. <i>‘The Development Plan for the Area includes: The London Plan (2004) and the London Borough of Islington Unitary Development Plan (2002). The policies in these documents that are agreed as relevant to these appeals are listed in the Statement of Common Ground (Document 25). An Islington LDF Core Strategy is at an early stage of preparation and a Spatial Development Strategy for London is being prepared. The Council has also prepared supplementary planning guidance on, amongst other things: Conservation Area Design Guidelines, Islington Urban Design, Affordable Housing, Lifetime Homes and Wheelchair Users Housing and Car-Free Housing. The Mayor of London has prepared supplementary planning guidance on Housing, which includes guidance on affordable housing.’</i></p>	<p><i>‘Relevant national guidance is to be found in PPS1, PPS3 (issued during the Inquiry), PPG4, PPS6, PPG13, PPG15 and the document Delivering Affordable Housing (also issued during the Inquiry). The inspector here referred specifically to PPS1 tests in his deliberations.</i></p> <p>He went on to say: <i>‘As to the quality of the proposed designs and the impact they would have on the conservation area, whilst I accept that these are of great importance, I shall try to deal with them briefly. I have already noted the important beneficial effect that redevelopment of this gap site and the removal of the unattractive existing buildings could have. What follows should be read in this context.’</i></p>	<p>An appeal letter for a block of sheltered accommodation in a conservation area did not refer to PPS15, PPS1 or By Design, but did refer to the Urban Design Compendium, and a comment it makes about landmarks: <i>‘The significance of such sites in urban design is recognised in the Urban Design Compendium, which highlights the desirability of placing higher buildings in key locations such as on corners, at the end of vistas and around parks. To my mind, the appeal site fits each of these descriptions equally well’.</i> The local authority is very worried about the impact of this decision, and it could be read as the inspector was trying to find reasons to approve a large building on the site. This Compendium comment is not in national policy, and may have been taken out of context in this case.</p>

<p>What happens after the appeal</p>	<p>From a decision letter granting approval. <i>'as to planning conditions, despite a larger number included in the report to the Council's planning Committee, only five 'headings' have been suggested a being needed...I accept the first 4.....'</i></p> <p>In this case balconies shown on the road elevations which influenced the inspectors decision were subsequently lost as no condition to approve external details was included, and the Council did not feel they would win an enforcement appeal.</p>	<p>One dismissed appeal looked at the replacement of 2 large houses with a block of flats with parking in the back garden areas accessed through a courtyard. The appeal was dismissed because it is <i>'unduly dominant in the street scene'</i></p> <p>Therefore a smaller block, still with inappropriate parking, could be negotiated on the back of the appeal.</p>	<p><i>'In my view, with appropriate detailed treatment that could be ensured by way of a condition, the main road elevation and the space in front of it, would improve the street scene and make a positive contribution to the amount of green space in the locality'.</i></p>
<p>Aesthetic issues</p>	<p><i>'The reason for refusal associates the provision of amenity space with the character of the area, rather than with the living conditions of the future residents of the development.'</i> In this case the inspector looked at aesthetic issues.</p>	<p>In one appeal the inspector came out and frankly said aesthetic considerations are arbitrary, saying: <i>'I did find the criticisms of the irregularly arranged windows at the eastern end of the proposed façade and the failure of the third residential floor to align with the floors below to be convincing. I recognise that this may be little more than an expression of my preference for regularity and repetition,'</i></p>	<p>Even though the appeal turned on density issues, there was a sub heading materials and design which dealt with the appearance of the scheme, not the appropriateness of the density. In particular it looked at horizontal and vertical emphasis and plot widths. This was the main reason for refusing the appeal.</p>
<p>Dealing with more functional issues</p>	<p>This appeal turned on the issue of housing density, and referred to PPS3. However the summing up para said <i>'I conclude on this issue that the proposed development</i></p>	<p>No quotes are available dealing with other functional issues such as the quality of public spaces, natural surveillance, inclusive access, permeability, legibility etc as none</p>	<p>In an appeal for development in a conservation area density was a key issue. The inspector said; <i>'There is no doubt that this is an area with exceptionally good public</i></p>

	<p><i>would not have a significant harmful effect on the character and appearance of the locality....'</i> In this way the inspector is pulling density back to a primarily visual issue. However the letter did also refer to the effect on the living conditions of neighbours, but said nothing about the quality of housing being built or the quality of life of future residents.</p>	<p>have been found.</p>	<p><i>transport links, and, although the site is not in central London, it is one where, in my opinion, high density development could be accepted. In these circumstances I regard density policies as a tool to assist in achieving a well-conceived schemes and not as a target or a ceiling.</i></p>

Table 2

When is an issue a design issue?

This table attempts to consider the various issues raised by the inspector in an appeal for a residential scheme in tower hamlets, and examine which might be considered as design issues.

The appeal ref is APP/E5900/A/04/1168750. the decision was made in March 2006. The application was for residential development, including a tall tower, in a dense urban area on the fringe of the City of London. The inspector identified 7 main issues in the case. They are set out below, with reference to By Design and PPS1 principles and policy.

In summery, only the visual effect of the development was presented by the inspector as a design issue, although a number of other points considered, including effect on microclimate and the living conditions of future occupiers relate to design policies in PPS1. Inclusive design and the need for quality public spaces, both key policies in PPS1 and By Design, where not really considered in the letter although conditions relating to them were imposed by the inspector.

It may be that the way the issues are presented really does not matter that much, as long as they are considered. But it can be hard to tell if PPS1 policies are considered relevant by the inspector if they are not referred to.

Issue covered in appeal decision.	How was it presented	Is this a design issue? How do PPS1 and By Design refer to this.
Effect of the proposal on the street scene and setting of nearby listed church	<p>The inspector considered that the proposals represented high quality design, - that is, the architectural integrity of the different building elements, materials, detailing etc where of a high quality.</p> <p>The proposed buildings were considered</p>	<p>These are clear design issues, relating mainly to the look of the place.</p> <p>Of the main PPS1 design objectives this relates to:</p> <ul style="list-style-type: none"> • <i>be integrated into the existing urban form and the natural and built environments;</i>

	<p>better quality than the existing buildings, and so the proposal was considered to enhance the setting of the listed building and streetscape</p>	<ul style="list-style-type: none"> are visually attractive as a result of good architecture and appropriate landscaping <p>Distinct character is one of the 7 principles of good design in by Design.</p>
<p>Effect on microclimate (particularly wind turbulence)</p>	<p>The discussion here revolved around what degree of additional wind turbulence would be acceptable.</p> <p>It was not put forward as a design issue</p> <p>The inspector did not consider what people might be doing in the streets around the development, if ground floor uses would encourage outside seating for example. Therefore there did not seem to be consideration of the PPS1 policy. The consideration seemed to be that the added wind would be within tolerable limits.</p>	<p>PPS1 says good design should:</p> <ul style="list-style-type: none"> <i>consider the direct and indirect impacts on the natural environment</i> <p>It also explains that good design should ensure places are comfortable and useable for everyone, making places better for people and improving function should not be approved.</p> <p>By Design calls for high quality public spaces. Wind, shadowing etc will effect the quality and usability of public spaces.</p>
<p>Effect on the supply of floorspace for employment related issues</p>	<p>This related to local policy issues. It was not put forward as a design issue, which it is not.</p> <p>But mixed use generally is a design issue, in particular having active frontages to public spaces. The Inspector considered that the proposal would bring life back to the street and would improve its</p>	<p>PPS1 calls for good design to:</p> <ul style="list-style-type: none"> <i>be an integral part of the processes for ensuring successful, safe and inclusive villages, towns and cities; and</i> address the connections between people and places by considering the needs of people to

	<p>appearance, and imposed a condition requiring window displays at the ground floor at all times. This was not presented as a design issue.</p>	<p>access jobs and key services</p> <p>there is a lot of design policy about the importance of design and mix of uses for the prevention of crime and improving vitality of places.</p> <p>By Design sets diversity of use as one of the principles of good design.</p>
<p>Effect on living conditions of occupiers of adjoining properties.(particularly daylight and sunlight)</p>	<p>The inspector referred to BREE standards to assess the appropriateness of impacts. This was not put forward as a design issue, although often effect on neighbours and 'amenity' is seen as a direct result of the design of the scheme.</p>	<p>Neither PPS1 or By design make much reference to local amenity and preserving the living conditions of neighbours.</p> <p>But with PPS1 saying development should make places better for people it is hard to square this with any reduction in local amenity, even to an 'acceptable' limit. Maybe this is an area where policy does not marry well with the realities of day to day planning.</p>
<p>Offer acceptable living condition for future occupants (daylight and amenity space)</p>	<p>The inspector did not present this as a design issue, but in general living conditions will be influenced by the design quality of the buildings including the materials, internal and external layouts, use of windows etc.</p> <p>The inspector did not address inclusive access within the letter, but imposed a condition requiring a disabled access scheme. Again this was not put forward as</p>	<p>PPS1 policies talk about creating places that function well for people, for example by;</p> <ul style="list-style-type: none"> • addressing the needs of all in society and are accessible, usable and easy to understand by them <p>It seems to suggest that the quality and usability of places created is relevant.</p> <p>Inclusive access is a key design policy in PPS1. It often relates to the inside of buildings as much as to external access.</p>

	a design issue.	
Acceptable mix of size of housing units	<p>This was considered by the inspector, but the site characteristics led to a conclusion that family units would not be appropriate. This was partly because of problems of providing play and amenity space. The inspector felt that this could not be appropriately provided next to the main road on the ground level, but that some roof terraces may be acceptable.</p> <p>These issues were not presented as relating to design in any way.</p>	<p>PPS3 now requires local authorities to set policies on the mix of unit sizes they wish to see.</p> <p>PPS1 and By Design both talk about the need for high quality open and public spaces and there are references to the importance of this for public health.</p> <p>Achieving a mix of units has been seen by many to be a design objective, but maybe this point helps to show the indivisibility of land use planning and design considerations.</p>
Adequate provision for affordable housing	Not presented as a design issue	Not covered in design policy.

