

**Draft Kent Design Guide
Report on Public Consultation
Summary**

**September 2005
Produced by the Kent Design Initiative**

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1. Introduction

The Kent Design Guide has been produced in draft as a proposed replacement for the current document 'Kent Design – a guide to sustainable development'. It has been produced by the Kent Design Initiative which is a partnership of all Kent's local authorities, developers, professional bodies, amenity groups and academic institutions.

The draft document is the result of a process of review and assessment of the content of not only the current guide, but also previous versions of the guide used over the past three decades. It is the intention of all Kent's local authorities that the new guide in its final form is adopted as a 'Supplementary Planning Document' under the planning act. This means it will be a key consideration when determining planning applications in the County.

The strength of the guide will be contained in its relevance to current Government policy, its compatibility with the Structure Plan and local authorities' Local Plans and Local Development Frameworks and the extent to which it is seen as a rallying point for quality design.

The important messages that emerge from the process of review and consultation are:

- That there is an increasing public awareness of the importance of achieving good design
- That local authorities and developers must work collaboratively early in the design process to achieve good design
- That Kent's local authorities should use the guide to raise design standards in all new development across the County, rejecting obviously poor schemes

This report summarises the key issues that emerged during the period of public consultation and proposes changes to the draft document in response. The appendices contain a detailed schedule of comments received and the individuals and organisations submitting them along with proposed responses, a sustainability appraisal and strategy for community engagement.

Paper copies of every consultation response received are available for public inspection at Kent County Council's Offices in Maidstone. Call 01622 696875 for further details.

2. The Public Consultation Process

The new Planning Act introduces a new series of development plans called Local Development Frameworks that are intended to replace the existing system of Structure Plan and Local Plans. Kent's local authorities have collectively committed themselves to reviewing the existing design guide on a County – wide basis with a view to adopting the new document under the new system of Local Development Frameworks. Unfortunately, the new Planning Act does not contain specific guidance for consultation and adoption of such a document for a County.

The following process has been designed, therefore, to follow the guidance on public consultation contained in the new Act relating to Supplementary Planning Documents, with the advice of the Government Office for the South East, and recognising that the system of Structure and Local Plans is still in position.

The public consultation has involved:

- Pre – publicity including a press release and adverts placed in local papers and distribution of over 15,000 leaflets
- Displays in all Kent authorities' main offices with copies of the draft document available for inspection
- Distribution of 600 copies of the guide to key stakeholders
- A new look Kent Design website where copies of the draft guide can be viewed and downloaded including an interactive comments form for submitting your views on the draft guide
- Workshop sessions in each local authority explaining the guide and the process for consultation

The process is set out in more detail in the Strategy for Community Involvement contained in Appendix C.

The public consultation period ran from 23 May to 1 July. 96 Consultation responses have been collected by each local authority and compiled by staff at Kent County Council responsible for project managing the review process. 28 responses were submitted on the standard comments form, the rest were in the form of a letter or e-mail. Each response has been allocated a unique reference number and a schedule has been produced that tracks each comment and the proposed response to it (see Appendices A and B).

In parallel with this process, the Planning Act requires that a document of this type undergo a 'Sustainability Appraisal'. This process sets out to assess the document's likely contribution to the social, economic and environmental aspects of sustainable development. Many new planning policy documents have to undergo a similar process. Jacobs Babtie have been commissioned to carry this out and their appraisal is contained in Appendix D.

This report summarises the main findings of the consultation process and proposed changes to the document in response to it. Each individual or organisation will be notified of the availability of this summary and attached schedules, giving them the opportunity of further comment before the document is finalised and published.

3. Summary of Responses Received

The responses to consultation have come from a variety of organisations and individuals, but have been generally from sources that are close to or directly involved in the design of the environment.

They are dominated by public bodies, including local authorities (all District Councils, Medway and Kent County Council), Parish Councils, Government agencies and watchdogs (64). A number of responses have been received from local design practices including architects and planning consultants (10) and some developers (5). A number of local amenity groups have responded (5) as well as national organisations or associations (7). A handful of comments were received from individuals (5).

The nature of the responses fall into these broad categories:

- Philosophical – general comments concerned with the remit of the guide, its direction, the coverage, its audience and operation
- Technical – concerned with its content, its accuracy and its effectiveness as policy
- Structural – concerned with its appearance, its format and its ease of use

Philosophical

Reaction to the guide was generally favourable with many responses expressing support for the process and the need for action on design quality. Generally, public organisations felt that the Guide would provide a useful tool for rejecting poor design using the planning process. However, a number of comments received from non-public organisations and individuals expressed scepticism about the strength of the planning system and the commitment of planning authorities in holding out for good design.

Generally, the content of the guide was felt to be comprehensive though some areas of the guide were stronger than others. A number of responses suggested that the guide was too focused on residential development and on highway related issues. A number of responses called for greater coverage of issues not currently reflected in the content, in particular on design in a rural setting and commercial and industrial design.

In response, the Guide has been re-structured to try to ensure a comprehensive coverage of key issues with some editing and re-positioning of existing text to make the advice more accessible.

New text will cover some important weaknesses in coverage, notably commercial design. The call for other areas to be included in more detail has to be balanced against the useability of the document, its overall length and the possibility that advice may be available from other publications devoted specifically to that subject. This demands efficient referencing as well as editing.

It is also suggested that documents can be produced to supplement the Guide on specific issues. Work has already begun on best practice guidance notes concerning water efficiency, biodiversity, waste management and a range of other topics.

Technical

The vast majority of technical comments were concerned with the accuracy of the Guide's wording and its relationship with planning policy both at local and national level. This reflects the importance of the wording in backing planning committee decisions and ultimately appeals.

Calls for different issues within the content to receive greater coverage or emphasis in terms of technical content generally related back to the source organisation of the comment and whether it helped them achieve their overall objectives. Public organisations were generally concerned with ensuring the wording is strong and enforceable. Architects and designers were more concerned to see that the Guide retained the flexibility to produce good contemporary design. Amenity groups and campaign groups were generally concerned to see that their particular interest area was covered.

In general terms, the Guide retains the flexibility to accommodate most views expressed. In offering guidance, however, the key principal of there being local solutions to design problems was felt to be the overriding principal.

Structural

The standard comments form contained questions relating to the length of the guide, coverage and ease of use. Many comments were received that felt the Guide was too long and the advice it contained too difficult to access. A number of responses felt that the wording was still too technical and difficult for some audiences to understand.

It is an aim of the document to provide guidance for all forms of development and the audiences wishing to access the information has to influence the form of the document. Issues were dispersed within the public consultation version of the document and there was some repetition. Too often issues were defined, requiring a lengthy preamble, before guidance was offered. The sustainability appraisal suggests that issues of definition and clarity could be dealt with through appendices, leaving the main body of the document to concentrate on practical advice.

A hierarchy of advice should therefore be provided meaning that the document provides clear advice on the basis of the scale of the proposal and advice on certain issues. The content should be equally accessible, regardless of the nature of the development proposal. The index, contents page and waymarking throughout the document should work hard to achieve this.

4 Proposed Alterations

The comments received have been analysed in relation to the text contained in the public consultation draft of the Guide. A detailed schedule of proposed responses and suggested alterations to the document has been produced (see Appendix A). Because of the complexity of the document and the nature of some of the comments on structure, these will be hard to trace through to the final draft document.

It is proposed that the structure of the existing Guide be amended to address some of the concerns relating to access to the information contained. The detailed content of the public consultation document is retained but re-ordered to enable it to be more accessible. A key addition is Section 3 that will contain new content. A new structure is proposed as follows. The chapter titles may alter in the final version:

Foreword: inspirational but challenging statement of intent, with strongly worded message that poor design will no longer be tolerated.

About this Guide: Introduction to the Guide, its objectives and how to use it.

Chapter 1 – The Value of Good design: emphasises the importance of design quality, sets out the unique character and context of Kent. It gives a short summary to those who will need a broad overview of the Guide. It establishes the basic principles of good design and strategic messages formerly scattered throughout each section of the public consultation document.

Chapter 2 – Creating the design: forms the meat of the design guidance and is aimed at practitioners. A checklist will be included at the end of the chapter. The detailed design advice contained in each chapter of the public consultation document will now be included in this section.

Chapter 3 – Submitting the planning application: A new Chapter that covers the *process* of achieving good design, including supporting documentation, encouraging pre-application advice and community involvement.

Appendices and Further Information: including an index, bibliography, glossary, case studies and references to other policy and guidance documents. Much of the commentary text contained in the public consultation version of the Guide will be moved to the appendices. The document will be proof-read for cross referencing to further reading including contact details of organisations.

Text Style

The existing text will be reviewed and comments incorporated. A journalistic copy editor has been engaged to edit the text and set a language style that is more accessible. Wherever possible the text will be reduced in length.

Images

It is vital to convey the right message through the images, and indeed respond to those readers who will not look beyond the pictures and their captions. All images have been reviewed: some have been retained, others re-taken or replaced. The review team is working with:

- A picture researcher: to search image catalogues for suitable photos

- A photographer: commissioned to capture inspirational new development in Kent and elsewhere in the south east.
- An artist: working on a series of sketches to replace the sketch drawings in the draft Guide. Some will be worked up to larger illustrations.

Some images will be from outside Kent where there are no examples in the County that illustrate best practice in a key area.

In almost all cases, images will be accompanied by explanatory text or commentary.

Format

It is intended that the final document will be produced in full colour, in landscape A4 format with spiral binding and a semi-hard cover.

A series of tabs will mark the chapter start and key section headings. Fold out checklists will summarise key points for ease of reference.

A presentation box will contain the final document allowing scope for a small number of other documents and the accompanying Technical Specifications to be stored with the Guide. This will allow it to be placed upright on a shelf at approximately the height of a standard lever arch file.

5. Conclusion

The consultation period revealed some insightful comments on the scope and coverage of the Guide. Overall there was strong support for the document and some hopes expressed that if sensibly applied it could make a real difference in achieving design quality across the County.

A number of changes to the document have been proposed that are designed to make the document:

- more focused in setting out its guiding principals
- more accessible for the range of audiences who will use it
- more coherent and easy to read
- richly illustrated with relevant practical diagrams and images

In doing this the review team have been keen to balance the potentially conflicting demands on the document. The purpose of the Guide is not to repeat or duplicate advice elsewhere, but to provide a practical document with a Kent focus that assists dialogue and negotiation at the local level.

The consultation process in itself has helped build a common understanding of what quality design means for Kent. The challenge does not stop when the Guide is published. The Guide in its final form will just be the start of a series of joined up activities across sectors that will cover training, best practice research, beacon schemes and awards. The Guide may be the rallying point, but it is up to everyone concerned in the design, approval and implementation of development across the County to play their part.