## HEARING POSITION STATEMENT ON BEHALF OF CPRE CHESHIRE BRANCH (ID 1227334)

## Matter 6: General Requirements

## Design principles (Policy GEN 1)

Q.100 Policy GEN 1 does not serve a 'clear' purpose. As with a number of other policies such as HOU 12, it lacks essential detail, specificity and references. It makes no reference to Neighbourhood Plans or Supplementary Planning Documents such as Village Design Statements. Nor does it mention masse. In addition, it fails to cross reference to HOU 11 on residential standards and to HOU 12 on density and, on the subject of density, it needs to recognise it as a design issue as well as a safety one.

On January 30<sup>th</sup> 2021 the Ministry of Housing, Communities & Local Government (now the Department for Levelling Up, Housing and Communities) published a draft National Design Code and launched a consultation into it which ended on March 27<sup>th</sup>. The outcome was the publication on July 20<sup>th</sup> of the National Model Design Code: part 1 – the coding process – and part two – guidance notes. These form part of the government's planning practice guidance with which local planning authorities are required to comply. Obviously, because of the timing of this initiative, it is not specifically incorporated into the publication version of CEC's SADPD, although we note a reference in paragraph 3.5 to a "National Design Guide (or as an updated)". However, the fact that the hearings into the SADPD are taking place this autumn, presents an ideal opportunity for CEC to commit in its Local Plan to producing its own unique design code and to requiring developers to adhere to it.

- **Q101** The first principle in this policy is not clearly written. It begins by making a statement about the whole borough's 'quality of place', whilst failing to offer any definition of what that is, but it ends by referring to "quality of place of the local area". In addition, as the question implies, it also falters in that it does not offer any criteria which would cause a development to 'fail'. This would be an ideal opportunity to reference Neighbourhood Plans, Village Design Statements and other supplementary planning documents which cover local design features.
- *102* No, they are not consistent but this examination is an ideal opportunity to rectify the situation.