

## **Bradford Local Plan**

### **Core Strategy Examination Session Day Eleven**

#### **Matter 7G: Achieving good design**

**Date: 20<sup>th</sup> March 2015**

**Venue: Victoria Hall, Saltaire**

## Issue 7.30

### Policy DS1 – Achieving Good Design

- a. Is the approach to achieving good design, including the specific measures set out, fully justified with evidence, effective, deliverable, positively prepared, soundly based and consistent with the latest national guidance (NPPF/PPG)? Have viability issues been considered?

### Response

*“Achieving good design is about creating places, buildings or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations.”* – Planning Policy Guidance (Design paragraph 001).

- 1.1 Policy DS1 seeks to set the agenda for achieving good design by focussing on the processes and approaches that can help deliver great places, including promoting collaboration and working with local communities.
- 1.2 The Council considers that the Policy is soundly based. The case for this is set out below and is based on the criteria set out in paragraph 182 of the National Planning Policy Framework, and with reference to the Soundness Self Assessment Checklist (SD/008).
- 1.3 The policy has been **positively prepared**. It can help to achieve Strategic Objectives set out in Paragraph 3.15 of the Core Strategy, in particular 4 and 11, and it can also contribute to 9, 10, 12, 13, 14 and 16. As stated in the Planning Practice Guidance, *“design can affect a range of economic, social and environmental objectives beyond the requirement for good design in its own right”* (Paragraph: 006 Reference ID: 26-006-20140306).
- 1.4 It is considered that the policy is **Justified** and sets out an appropriate strategy based on proportionate evidence. The Core Strategy Baseline Analysis Study (EB/038) identifies a number of background documents which provide a good understanding of the district and the opportunities which exist to improve places.
- 1.5 An understanding of the existing character of the district is provided by the Landscape Character Assessment SPD and the Conservation Area Assessments and Appraisals. These identify the elements which contribute to local character along with guidance on how future development can maintain, enhance and respond to it. Chapter 6 of the Baseline Study provides further detail on these documents.
- 1.6 The Council has identified a number of areas in the district for regeneration and change. Assessments have been undertaken of the existing quality of these areas and of the opportunities that exist to enhance them and make them better places. Chapter 3 of the Baseline Study lists and provides further details of these. They include the work

undertaken for Bradford City Centre (including the City Centre Design Guide SPD), the Canal Road Corridor, Manningham, Airedale, and East Bradford/Leeds Bradford Corridor.

- 1.7 Design review can add value to schemes and since the publication of the NPPF in 2012 the Council has submitted a number of major proposals to the design review service provided by Design Council Cabi and its regional affiliate for Yorkshire and the Humber, Integreat Plus.
- 1.8 The Council offers a pre-application advice service for major development proposals. This brings together officers from a broad range of disciplines to meet and discuss proposals at an early stage in a collaborative manner before providing advice back to the applicant.
- 1.9 The **effectiveness** of the policy can be monitored through the performance of new development schemes against the Building for Life 12 assessment tool.
- 1.10 It is considered that the wording of the policy allows for flexibility which will enable proposals to evolve and achieve the most appropriate balance between the design vision and deliverability.
- 1.11 The policy has been informed by:
  - National Planning Policy Framework (DCLG, 2012)
  - Planning Policy Guidance (DCLG, 2014)
  - Manual for Streets (DfT, 2007) – Following the review of planning guidance by Lord Taylor of Goss Moor this document is retained as national planning guidance.
  - Building for Life 12 (Design Council Cabi/Design for Homes/Home Builders Federation, 2012) – Whilst this is not formal national planning guidance it is endorsed by the government as the national standard for well designed homes and neighbourhoods.
- 1.12 Below is a summary of how each of the criteria of the policy is consistent with national policy and guidance.
- 1.13 Criterion A is consistent with:
  - NPPF paragraphs 56 and 57;
  - PPG paragraphs 001 and 006 (Design section);
  - Building for Life 12
- 1.14 These identify that development should contribute positively to making places better for people, and that good design can have wider social, economic and environmental benefits. Building for Life 12 is intended to be a collaborative tool to stimulate discussions between local authorities, developers and local communities about creating good places to live.

- 1.15 Criterion B is consistent with:
- NPPF paragraphs 58 and 61;
  - PPG paragraphs 007 and 014 (Design section) and paragraph 031 (Making an Application section);
  - Manual for Streets paragraphs 3.6.1 – 3.6.12;
  - Building for Life 12 questions 1, 2, 3, 5 and 6
- 1.16 These identify the importance of appraising the context of the proposed development and considering how the design of the development could take that context into account. Design & Access Statements are a tool for communicating the thinking behind designs.
- 1.17 Criterion C is consistent with:
- NPPF paragraphs 66 and 69;
  - PPG paragraph 031 (Design section);
  - Manual for Streets paragraph 5.11;
  - Building for Life 12
- 1.18 These identify the vital part which local communities can play in achieving good design whether by working with applicants to evolve designs or preparing Neighbourhood Plans.
- 1.19 Criterion D is consistent with:
- NPPF paragraphs 58 and 64;
  - PPG paragraph 014 (Design section)
- 1.20 These state that development should take the opportunities available to improve areas and optimise the potential of the site based on a good understanding of neighbourhoods and how they could be improved.
- 1.21 Criterion E is consistent with:
- NPPF paragraph 62;
  - PPG paragraph 035 (Design section) and paragraph 014 (Before submitting an application section)
- 1.22 These identify the beneficial value of Design Review as a tried and trusted method of improving design quality and there is a requirement for local authorities to have local design review arrangements in place.
- 1.23 Criterion F is consistent with:
- NPPF paragraph 58, 61 and 64;
  - PPG paragraph 032 (Design section)

- 1.24 These identify the importance of integrating new development and ensuring that it contributes to the overall quality of the area. Masterplans can provide strategies for new development and set parameters for matters such as open space and transport infrastructure, movement networks, and the amount, scale and quality of buildings. This can ensure that individual developments all contribute to the wider vision.
- 1.25 A **Viability** Assessment (EB/046) has been undertaken by DTZ of the policies in the Core Strategy Publication Draft. It finds (Table 3.2, page 17-20) that Policies DS1 to DS5 individually will have no direct impact on the economic viability of development.
- 1.26 However it should be noted that cumulatively policies DS1-DS5 and HO9 seek to embed the principles of Building for Life 12 into planning policy. The viability assessment for Policy HO9 (see pages 33-34) assumes a 10% uplift in build costs associated with achieving the Building for Life standards. The Assessment advises that the impact of this will be to *“reduce the headroom for other planning standards in value areas 1, 2 and 3, and in value areas 4 and 5, the cost uplift further suppresses viability.”*

### Issue 7.31

#### Policy DS2 – Working with the Landscape

- a. **Is the approach to working with the landscape, including taking advantage of existing features, integrating development into the wider landscape, and creating new quality spaces, fully justified with evidence, effective, deliverable, positively prepared, soundly based and consistent with the latest national guidance (NPPF/PPG)? Have viability issues been considered?**

#### Response

- 2.1 Bradford's landscape is an integral part of its distinctive character. Policy DS2 identifies the role that new development can play in responding to existing features such as trees, watercourses and the topography to create attractive places which reinforce local identity as well as reducing their environmental impact. It also seeks to ensure that new spaces will be fit for purpose and will function well over the long term.
- 2.2 The Council considers that the policy is soundly based. Paragraph 182 of the National Planning Policy Framework sets out the tests of soundness – positively prepared, justified, effective, and consistent with national planning policy. These are considered in turn below.
- 2.3 The policy has been **positively prepared**. It can contribute to achieving several of the Strategic Objectives set out in Paragraph 3.15 of the Core Strategy, in particular objectives 11, 12 and 14. These seek to provide attractive built and natural environments, reinforce local distinctiveness, and utilise green infrastructure spaces for recreation. The policy supports these aspirations.
- 2.4 It is considered that the policy is **justified** and sets out an appropriate strategy based on proportionate evidence. The Core Strategy Baseline Analysis Study (EB/038) identifies a number of background documents which provide a good understanding of the landscape in the district.
- 2.5 The Landscape Character Assessment SPD identifies the elements which contribute to local character along with guidance on how future development can maintain, enhance and respond to it. Chapter 6 of the Baseline Study provides further detail on this document along with an overview of the District's natural landscape elements including landform, geology and biodiversity.
- 2.6 The Council has identified a number of areas in the district for regeneration and change. Assessments have been undertaken of the existing quality of these areas and of the opportunities that exist to enhance them, including improving watercourses, green infrastructure and the way development responds to the topography. Chapter 3 of the Baseline Study provides further details on these areas which include

Bradford City Centre, the Canal Road Corridor, and the Airedale Corridor.

- 2.7 The Sustainable Design Guide SPD (sections 2.1 and 2.2) identifies how development can respond to existing features of the site such as its orientation and vegetation to reduce the environmental impact.
- 2.8 The **effectiveness** of the policy can be monitored through the use of the Building for Life 12 assessment tool on new development schemes, particularly the performance against questions 5, 6 and 11.
- 2.9 It is considered that the wording of the policy allows for flexibility which will enable proposals to evolve and achieve the most appropriate balance between the design vision and deliverability.
- 2.10 The policy has been informed by the National Planning Policy Framework (NPPF), and also the Planning Policy Guidance (PPG), the Manual for Streets and Building for Life 12.
- 2.11 Below is a summary of how each criteria of the policy is consistent with national policy and guidance.
- 2.12 Criterion A is consistent with:
- NPPF paragraph 61;
  - PPG paragraph 007 (Design section);
  - Manual for Streets paragraph 5.12.4;
  - Building for Life 12 question 6
- 2.13 These identify the need to integrate new development into the natural environment, and thinking about how the landform and natural features can help give shape to a development and sustain local distinctiveness.
- 2.14 Criterion B is consistent with:
- NPPF paragraph 96;
  - PPG paragraph 013 (Design section);
  - Building for Life 12 question 6
- 2.15 These identify that new development should take account of landform, landscaping and layout to minimise energy consumption and address the challenge of climate change. This can include matters such as shade and shelter from the elements, sustainable drainage and passive solar gain.
- 2.16 Criterion C is consistent with:

- NPPF paragraphs 58 and 61;
  - PPG paragraph 009 (Design section);
  - Building for Life 12 question 1
- 2.17 These identify that planning should promote a network of greenspaces and that new development should connect into its surroundings. The benefit of greenspaces will be enhanced if they are integrated into a wider network of walkways, cycleways, open spaces and natural and river corridors.
- 2.18 Criterion D is consistent with:
- NPPF paragraphs 58 and 69;
  - PPG paragraphs 009, 016, 018 and 021 (Design section);
  - Building for Life 12 question 11
- 2.19 These aim to ensure that developments and places incorporate green and high quality public spaces. Spaces can be designed to be multi-functional providing a range of social and environmental functions. Space left over after development, without a function, should be avoided as it can detract from the identity and safety of a place. Consideration should also be given to the lifetime costs of designs and how these will be met.
- 2.20 Criterion E is consistent with:
- NPPF paragraph 58;
  - PPG paragraphs 007 and 020 (Design section)
  - Manual for Streets paragraphs 5.12.1 – 5.12.5;
  - Building for Life 12 question 5.
- 2.21 These highlight how appropriate landscaping and planting can reinforce local distinctiveness, integrate development into the wider environment, and be fit for local site and climate conditions.
- 2.22 See the response to issue 7.30 at paragraph 1.25 and 1.26 for consideration of **Viability**.



## Issue 7.32

### Policy DS3 – Urban Character

- a. **Is the approach to urban character, including the specific criteria set out, fully justified with evidence, effective, deliverable, positively prepared, soundly based and consistent with the latest national guidance (NPPF/PPG)? Have viability issues been considered?**

### Response

- 3.1 The urban areas of Bradford benefit from a rich and varied character. Policy DS3 seeks to ensure that new developments respond to their context, reinforce local distinctiveness and contribute towards creating a strong sense of place.
- 3.2 The Council considers that the policy is soundly based. Paragraph 182 of the National Planning Policy Framework sets out the tests of soundness – policies should be positively prepared, justified, effective, and consistent with national planning policy.
- 3.3 The policy has been ***positively prepared***. It can contribute to achieving Strategic Objectives set out in Paragraph 3.15 of the Core Strategy, in particular objectives 11 and 12. These seek to provide attractive built environments which foster a shared sense of civic pride and reinforce local distinctiveness. The policy supports these aspirations.
- 3.4 It is considered that the policy is ***justified*** and sets out an appropriate strategy based on proportionate evidence. The Core Strategy Baseline Analysis Study (EB/038) identifies a number of background documents which provide a good picture of the urban character of the district.
- 3.5 An understanding of the existing urban character is provided by the Conservation Area Assessments and Appraisals and the Landscape Character Assessment SPD. These identify the settlement patterns, elements and details which contribute to local character along with guidance on how future development can maintain, enhance and respond to it. Chapter 6 of the Baseline Study provides further detail on these documents.
- 3.6 The Council has identified a number of areas in the district for regeneration and change. Assessments have been undertaken of the existing quality of these areas and of the opportunities that exist to enhance their character and sense of place. Chapter 3 of the Baseline Study provides further details of the work undertaken for these areas which include Bradford City Centre, the Canal Road Corridor, Manningham, Airedale, and East Bradford/Leeds Bradford Corridor.
- 3.7 The Bradford City Centre Design Guide SPD sets out a number of design rules to guide new development. This includes guidance on

street hierarchy and character, the enclosure of space, and the animation of the public realm. It also sets out zones where new tall buildings will be acceptable, based on a thorough analysis of key views, scale of existing development and the topography.

- 3.8 The Shopfront Design Guide SPD provides detailed guidance on the character of shopfronts in the district and illustrates how new schemes can respond to these guiding principles of good design.
- 3.9 The **effectiveness** of the policy can be monitored through the use of the Building for Life 12 assessment tool on new development schemes, particularly their performance against questions 5, 6, 7 and 8.
- 3.10 It is considered that the wording of the policy allows for flexibility which will enable proposals to evolve and achieve the most appropriate balance between the design vision and deliverability.
- 3.11 The policy has been informed by the National Planning Policy Framework (NPPF), and also the Planning Policy Guidance (PPG), the Manual for Streets and Building for Life 12.
- 3.12 In accordance with paragraph 59 of the NPPF the policy seeks to guide the overall scale, massing, height, layout and materials of new development. Below is a summary of how each criteria of the policy is consistent with national policy and guidance.
- 3.13 Criterion A is consistent with:
- NPPF paragraphs 58, 60 and 63;
  - PPG (Design section) paragraphs 007, 020 and 023-028;
  - Building for Life 12 question 5

These state that planning policies should ensure that new development responds to local character and history, reflects the identity of local surroundings and materials, but they should not stifle innovation or originality.

Criterion B is consistent with:

- Building for Life 12 question 6

This identifies that retained older buildings or structures which have the potential for conversion can become focal points within new developments.

Criterion C is consistent with:

- NPPF paragraphs 58 and 69;
- PPG (Design section) paragraphs 018 and 024;
- Building for Life 12 question 8

These aim to achieve places which contain attractive and legible routes and high quality public space, incorporating memorable features that people will notice and remember, and make it easy to find their way around. Public art and sculpture can help make exciting, interesting places that people enjoy using.

Criterion D is consistent with:

- Manual for Streets paragraphs 3.6.20 – 3.6.23 and 4.7;
- Building for Life 12 questions 5 and 8

These highlight the value of varying the density, built form, appearance and types of streets on larger developments to give places a clear identity which people can easily understand. The PPG (Design paragraph 036), the Manual for Streets (paragraphs 3.6.28 – 3.6.34), and the NPPF (paragraph 59) identify the role which Design Codes can play in ensuring variety, character and quality on larger developments.

Criterion E is consistent with:

- NPPF paragraph 58;
- PPG (Design section) paragraphs 021, 024, 025 and 026;
- Manual for Streets paragraph 5.4.3;
- Building for Life 12 question 7

These identify the importance of thinking about how buildings relate to streets and spaces in terms of building lines and frontages, scale and mass and the way buildings turn corners. This can help to provide a strong sense of place with interesting and stimulating streets and spaces which are safe and secure.

Criterion F is consistent with:

- NPPF paragraph 58 and 60;
- PPG (Design section) paragraphs 007, 020 and 027;
- Building for Life 12 question 5

These identify that standard design solutions rarely create a distinctive identity or make the best use of the site and that consideration should be given to how local characteristics (e.g. details, materials, building forms, boundary treatments etc) can influence designs, including contemporary design.

Criterion G is consistent with:

- NPPF paragraphs 58 and 61;
- PPG (Design section) paragraphs 021 and 026
- Building for Life 12 question 6

These identify the importance of new development integrating with and reflecting the identity of local surroundings. The size, design and roofscape of buildings should be carefully considered in terms of how they affect skylines, vistas and views.

Criterion H is consistent with:

- NPPF paragraphs 58 and 61;
- PPG (Design section) paragraphs 007, 025 and 026.

These identify that taller buildings can pose specific design challenges which need to be carefully considered such as how they meet the ground, how they affect local wind and sunlight patterns, and how they impact on skylines and local character.

Criterion I is consistent with:

- NPPF paragraphs 58, 59 and 60;
- PPG (Design section) paragraphs 007, 020, 027 and 028.

These identify the importance of responding to and reinforcing local character, including details, materials and the scale of building elements.

See the response to issue 7.30 at paragraph 1.25 and 1.26 for consideration of **Viability**.

### Issue 7.33

#### Policy DS4 – Streets and Movement

- a. **Is the approach to streets and movement, including the specific criteria set out, fully justified with evidence, effective, deliverable, positively prepared, soundly based and consistent with the latest national guidance (NPPF/PPG)? Have viability issues been considered?**

#### Response

- 4.1 The design and layout of streets and paths can make it as easy and attractive to walk or cycle, or to take public transport as it is to travel by car. Policy DS4 seeks to ensure that new developments support this by creating a network of good quality routes which offer choice and connect to where people want to go.
- 4.2 The Council considers that the policy is soundly based. Paragraph 182 of the National Planning Policy Framework sets out the tests of soundness – policies should be positively prepared, justified, effective, and consistent with national planning policy.
- 4.3 The policy has been **positively prepared**. It can contribute to achieving Strategic Objectives set out in Paragraph 3.15 of the Core Strategy, in particular objectives 9, 11 and 14. These seek to improve accessibility, connections and walking and cycling routes. The policy supports these aspirations.
- 4.4 It is considered that the policy is **justified** and sets out an appropriate strategy based on proportionate evidence. The Core Strategy Baseline Analysis Study (EB/038) in Chapter 7 provides a good understanding of current movement patterns in the district. This highlights the existing dominance of the road system by private vehicles and the initiatives being undertaken to encourage other transport modes such as cycleways and greenways.
- 4.5 The Council has identified a number of areas in the district for regeneration and change. Assessments have been undertaken of the existing quality of these areas and of the opportunities that exist to enhance them, including creating better connected and more people friendly, pedestrian orientated places. Chapter 3 of the Baseline Study provides further details of the work undertaken for these areas which include Bradford City Centre, the Canal Road Corridor, Airedale, and East Bradford/Leeds Bradford Corridor.
- 4.6 The **effectiveness** of the policy can be monitored through the use of the Building for Life 12 assessment tool on new development schemes, particularly their performance against questions 1, 2, 3, 9 and 10.
- 4.7 It is considered that the wording of the policy allows for flexibility which will enable proposals to evolve and achieve the most appropriate balance between the design vision and deliverability.

4.8 The policy has been informed by the National Planning Policy Framework (NPPF), and also the Planning Policy Guidance (PPG), the Manual for Streets and Building for Life 12.

4.9 Below is a summary of how each criteria of the policy is consistent with national policy and guidance.

Criterion A is consistent with:

- NPPF paragraph 35 and 69
- PPG (Design section) paragraphs 008, 022, 24 and 041
- Manual for Streets section 4.5
- Building for Life 12 question 8

These identify the advantages of using an urban block structure to create a network of clear, connected and well overlooked streets which encourage people to walk and use the street.

Criterion B is consistent with:

- NPPF paragraphs 61
- PPG (Design section) paragraphs 008, 022, 024 and 041
- Manual for Streets sections 4.2 and 4.4
- Building for Life 12 questions 1, 2 and 3

These identify the importance of creating linkages between new development and existing streets, paths, local facilities and public transport in order to achieve more sustainable patterns of movement and reduce people's reliance on the car.

Criterion C is consistent with:

- NPPF paragraphs 35 and 61
- PPG (Design section) paragraphs 022 and 024
- Building for Life 12 question 1

These recommend responding to desired lines of travel, thinking carefully before blocking off or redirecting existing routes, and where practical giving priority to pedestrian and cycle movements.

Criterion D is consistent with:

- NPPF paragraphs 58 and 69
- PPG (Design section) paragraphs 012 and 042
- Manual for Streets sections 2.3, 2.4, 5.7, 6.3, 6.4 and 7.1 – 7.11
- Building for Life 12 question 9

These identify that in many cases the rigid application of highway engineering standards results in sprawl, formlessness and a lack of sense of place. The guidance in Manual for Streets shows how streets can be designed as attractive places for people whilst still integrating the needs of vehicles. Imaginative and context specific design can achieve high levels of safety and amenity.

Criterion E is consistent with:

- NPPF paragraph 58
- PPG (Design section) paragraphs 040 and 041
- Manual for Streets chapter 8
- Building for Life 12 question 10

These identify the challenge of providing car parking which is convenient, safe and secure but doing so in ways that doesn't detract from the attractiveness of street scenes and the character of the place.

See the response to issue 7.30 at paragraph 1.25 and 1.26 for consideration of **Viability**.

## Issue 7.34

### Policy DS5 – Safe and Inclusive Places

- a. **Is the approach to safe and inclusive places, including the specific criteria set out, fully justified with evidence, effective, deliverable, positively prepared, soundly based and consistent with the latest national guidance (NPPF/PPG)? Have viability issues been considered?**

### Response

- 5.1 Good design can help to foster a sense of community by creating places where people of all ages, abilities and backgrounds feel safe and at ease and can meet and interact with each other. Policy DS5 seeks to support this by ensuring that new developments reduce the opportunities for crime and antisocial behaviour, and buildings and places are accessible and function well for everyone.
- 5.2 The Council considers that the policy is soundly based. Paragraph 182 of the National Planning Policy Framework sets out the tests of soundness – policies should be positively prepared, justified, effective, and consistent with national planning policy.
- 5.3 The policy has been **positively prepared**. It can contribute to achieving Strategic Objectives set out in Paragraph 3.15 of the Core Strategy, in particular objectives 10 and 11. These seek to ensure that Bradford is a socially inclusive city which provides a clean, safe, secure, sustainable and accessible environment for its citizens. The policy supports these aspirations.
- 5.4 It is considered that the policy is **justified** and sets out an appropriate strategy based on proportionate evidence. The Core Strategy Baseline Analysis Study (EB/038) in Chapter 7 provides an insight into trends in the district including diversity, health and well being, and deprivation. Bradford is set to have one of the fastest growing populations in the country over the next 20 years and this population will become more ethnically mixed and will include significant growth among younger and older age groups.
- 5.5 The Planning for Crime Prevention SPD has been prepared in partnership with West Yorkshire Police and sets out guidance based on Secured By Design principles.
- 5.6 The effectiveness of the policy can be monitored through the use of the Building for Life 12 assessment tool on new development schemes, particularly their performance against questions 2, 11 and 12.
- 5.7 It is considered that the wording of the policy allows for flexibility which will enable proposals to evolve and achieve the most appropriate balance between the design vision and deliverability.



5.8 The policy has been informed by the National Planning Policy Framework (NPPF), and also the Planning Policy Guidance (PPG), the Manual for Streets and Building for Life 12.

5.9 Below is a summary of how each criteria of the policy is consistent with national policy and guidance.

Criterion A is consistent with:

- NPPF paragraphs 58 and 69
- PPG (Design section) paragraphs 008, 010 and 024
- Manual for Streets paragraphs 4.6
- Building for Life 12 question 7 and 9

These identify the importance of creating safe and secure places through, for instance, clear and well overlooked routes, avoiding left over areas of open space, and having the fronts of buildings facing onto public spaces rather than private backs.

Criterion B is consistent with:

- NPPF paragraph 58
- PPG (Design section) paragraphs 013, 016 and 019

These highlight the importance of ensuring that developments function well over the long term and that they are durable and adaptable to changing needs in order to reduce the demand on resources and expensive future changes. This includes the design and layout of buildings, public spaces, roads and infrastructure and utilities.

Criterion C is consistent with:

- NPPF paragraphs 35, 57, 58 and 69
- PPG (Design section) paragraphs 012, 022 and 042
- Manual for Streets section 6.3
- Building for Life 12 question 9

These identify the importance of creating accessible environments for everyone including wheelchair users and people with visual impairments. Issues to think about include entrances to buildings, and the design of routes in terms of gradients, lighting and the positioning of street furniture.

Criterion D is consistent with:

- NPPF paragraph 69
- PPG (Design section) paragraphs 014, 017 and 018
- Building for Life 12 question 9

These identify how well designed public space can cater for a range of different groups and people helping to support vibrant and healthy neighbourhoods.

Criterion E is consistent with:

- NPPF paragraph 58
- PPG (Design section) paragraphs 040 and 042
- Manual for Streets section 6.8
- Building for Life 12 question 12

These identify the importance of designing arrangements for servicing and waste to allow for ease of access and convenience but also ensuring that it does not detract from the quality of the street through for example the unsightly clutter of bins.

Criterion F is consistent with:

- NPPF paragraph 56
- PPG (Design section) paragraphs 014 and 026
- Building for Life 12 questions

These identify that design should make places better for people. Careful consideration should be given to as to how development will affect the overshadowing and overlooking of others and of vistas and views. Also a mix of uses should be compatible with each other and avoid the potential for conflict.

See the response to issue 7.30 at paragraph 1.25 and 1.26 for consideration of **Viability**.