

Critical Friend Review – Staines Upon Thames Town Centre Development Framework

Introduction

A decision needs to be made about whether the SDF should be included in or omitted from the local plan in the context of the Council's decision to prepare an authority wide design code, in line with new planning legislation. This paper provides an review of the SDF and whether in itself it can be used as a planning tool to ensure high quality, well designed buildings and places, which is the objective of a design code. The paper does not seek to answer whether the SDF should or should not be included in the local plan as this is a matter for officials to advise and members to decide.

Overview of the SDF

On the positive side, it is a typical framework of its kind produced by a reputable consultancy, it is well structured and addresses the key issues for development of a town centre. It assesses the character and constraints and highlights the areas of opportunity, including design principles that should be applied and sets out a framework for development. It refers to the key townscape and urban design considerations, including building form, movement, uses, open space, nature and special considerations such as waterside development. It identifies key opportunity sites and sets out recommendations for their development. It includes sound design guidance based on the National Design Guide and includes a good section on the '9 principles' for urban living.

It suggests there has been an effective consultation process and it states community concerns, a rationale for addressing these and resulting design principles. It is not clear how the community were consulted or the number and type of respondents which would be helpful in determining whether the document reflects community aspirations.

Limitations of the SDF

There are a number of issues that distinguish the document from a design code and supporting masterplan framework:

- The assessment of the character of the town needs to be strengthened. Character areas are identified but more could have been included about the strengths and weaknesses and how this informed the proposals, in particular how height, density, open space amenity and other factors have been determined from analysis of the areas.
- There is an inherent conflict between the need to respect the existing character ('...take account of prevailing character...') and increase the density and height of development.
- The document is a guide to development and contains few requirements with general language such as '...will be expected...', '...will be encouraged...', '...should demonstrate...' which lessens its effectiveness as a planning tool.
- A particular concern is whether the community's concerns about 'high rise' and bulky skylines has been adequately acknowledged. There are zones identified for heights of development and reference to density outcomes that might result. The heights are

guidance only and reference in the diagrams for 'landmark' buildings, signals an acceptance that recommended storey heights may be exceeded.

- The density maps for general areas need to be more specific. The challenge will be the transition between existing development and new and between different density areas.
- Factors that control height and density, such as private and public amenity space and car parking requirements are not specific.
- There is no clear expression of what constitutes local character, architectural identity, building form and roofscape.
- Other areas that could be strengthened include active travel, climate change mitigation and other sustainability requirements (which may be covered in other policies).
- Of significant consequence is the latest information on flood risk from the Environment Agency which suggests some of the sites in the framework are impacted such that the illustrations are either undeliverable or the proposals will need to be revised.

Summary

The SDF is a guide with aspirational illustrations that sets out the broad principles for intensification of the town centre. It has few specific requirements or constraints, and encourages an increase in density, whilst setting broad parameters for heights and density. It needs to be updated with new evidence on flood risk. It is insufficiently detailed in itself to guide and manage design quality. It is unlikely to guarantee delivery of high quality development without strong and critical enforcement by urban design specialists.

Recommendation

The SDF is a good start to setting out a framework for regeneration of the town centre. It includes well intentioned aspirations which should be strengthened by including design requirements ('musts') which are specific, quantifiable and measurable. It needs to transition to a design code for it to be an effective planning instrument.

A design coding approach which, rightly, focusses on the priority areas for development of the town centre, should more clearly identify types of development, their characteristics and specific requirements, with a simple set of specific design principles for development plots and a compliance toolkit for use by officials to help evaluate planning applications coming forward.

A design code should add the necessary detail to ensure that a high density town centre provides a healthy and sustainable living environment for its citizens based on good quality design principles and standards. The process for producing the code should ensure it has community support and be based on the most up to date data.

Whilst the SDF should be used as a starting point for developing a design code, all the above factors may lead to a different outcome, certainly in detail if not in principle. For that reason it is reasonable to question whether the SDF should be included in the local plan, given that it may lead to unintended outcomes in the interim before a design code is in place.