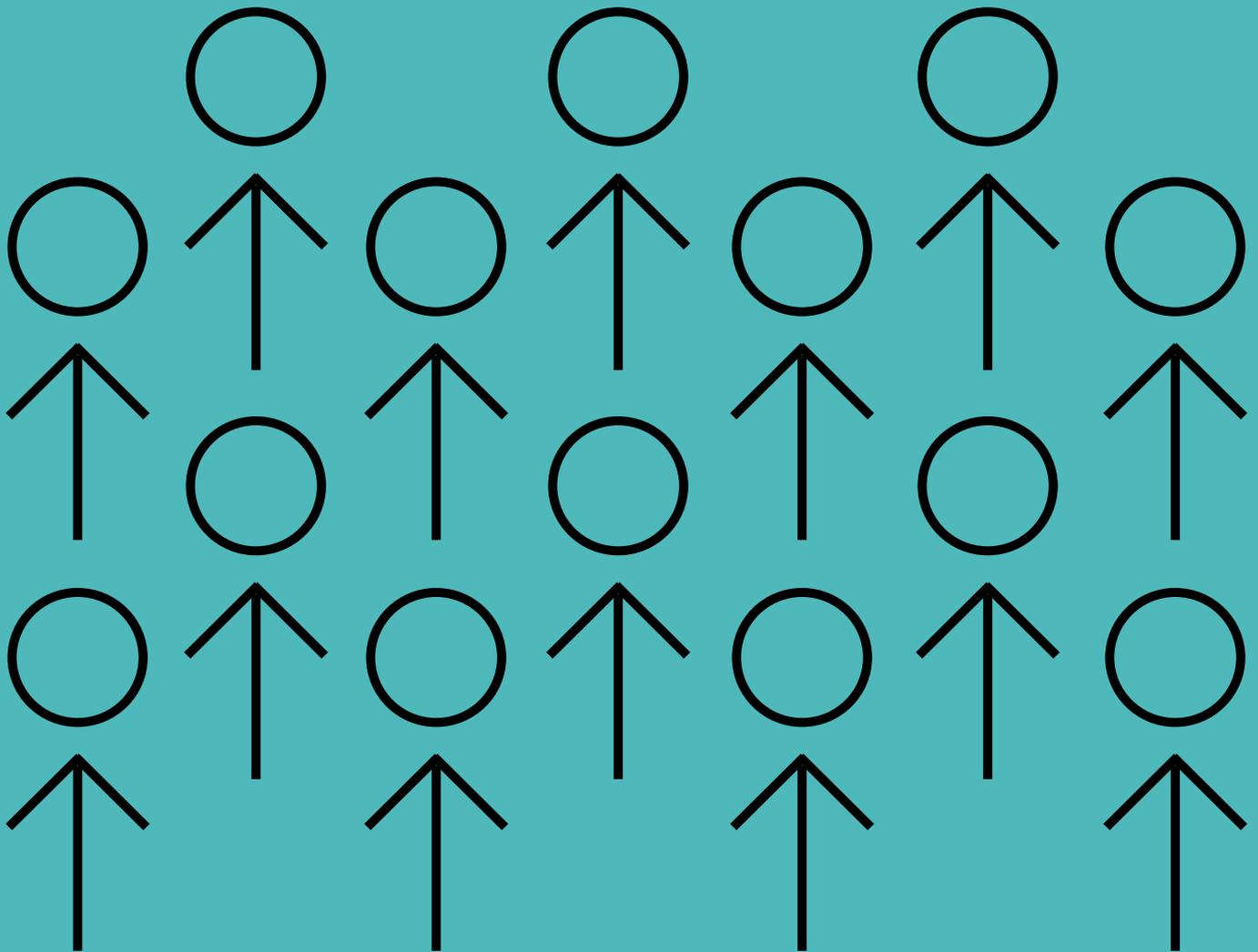


# Empowering Case Officers: How can officers improve design quality through the pre-app process?



Public Practice is a not-for-profit social enterprise with a mission to improve the quality and equality of everyday places by building the public sector's capacity for proactive planning.

10% of the year-long placements is dedicated to a Research & Development programme to share new knowledge and practice across authorities. This Practice Note is one of the outputs of this programme.

# EMPOWERING CASE OFFICERS

## How can officers improve design quality through the pre-app process?

This Practice Note is based on research carried out as part of a year-long placement in the London Borough of Hounslow. It explores strategies that local authorities can use to shape design outcomes through the pre-application process. The research took place between April 2019 and March 2020 and was focused on the London Borough of Hounslow, but findings and recommendations may be useful for planning authorities within and beyond London who are invited to help test, develop and improve the findings and recommendations put forward in this Practice Note.

### CONTEXT

Both local and national planning policy is refocusing attention on the importance of design and on improving the quality of the built environment through the planning system. The National Planning Policy Framework (NPPF) Chapter 12 emphasises the importance of ‘good design as key to sustainable development’ and sets out the importance of authorities setting ‘design expectations’ in order to achieve high-quality outcomes.<sup>1</sup>

The Ministry for Housing, Communities and Local Government’s (MHCLG) long-awaited National Design Guide sets out the government’s expectations for new developments, highlighting 10 characteristics that are considered to make up a ‘well designed place’. This Guide is intended to ‘provide a common framework for identifying, assessing and discussing design quality’.<sup>2</sup> The guidance has been widely welcomed and adds substance to the definition of ‘good design’ as a material planning consideration.

The Draft New London Plan emphasises the importance of ‘maintaining design quality’ throughout the planning development process and explicitly places the responsibility for monitoring and ‘scrutinising’ this with local planning authority development management (DM) planning officers.<sup>3</sup> Against a backdrop of London boroughs trying to meet challenging

<sup>1</sup> [gov.uk/government/publications/national-planning-policy-framework--2](https://www.gov.uk/government/publications/national-planning-policy-framework--2)  
Chapter 12

<sup>2</sup> [National Design Guide: Planning Practice Guidance for Beautiful, Enduring and Successful Places](#) MHCLG, October 2019, Paragraph 35

<sup>3</sup> Draft New London Plan, chapter D2, F ‘Maintaining Design Quality’

housing targets, this places increasing pressure on under-resourced, time-poor DM officers.

The practice note 'Planning Ahead' identified limited in-house design skills within planning departments alongside a lack of consistency and standards, both across boroughs and within planning departments, as being key factors limiting an Authority's ability to ensure good design outcomes.<sup>4</sup> It also noted an inconsistency of outcomes and a perceived lack of transparency as key reasons for applicants to register dissatisfaction with the pre-application process.

This practice note expands on that report but focuses on some of the practical challenges that DM officers face when scrutinising and monitoring design quality through the pre-app process. It looks at whether the introduction of practical tools, such as design trackers, could aid DM officers to shape design outcomes more effectively and make the most out of limited in-house urban design resources.

<sup>4</sup> [publicpractice.org.uk/resources/planning-ahead](https://publicpractice.org.uk/resources/planning-ahead)

## HOUNSLOW AS A CASE STUDY

This research took place in the London Borough of Hounslow, an outer London borough in the west of the capital with a housing target of approximately 20,000 homes in the next ten years.<sup>5</sup> A number of Hounslow-specific factors influenced the nature and focus of this research:

### 1. PLANNING POLICY SETTING

Hounslow's Local Plan review (due to undergo Examination in Public at the time of writing) identifies two opportunity areas, the West of the Borough and the Great West Corridor, where most of the growth will take place. It sets out the council's vision to shape the growth and transform these areas over the next 15 years.

### 2. DESIGN POLICY FRAMEWORK

To cope with the impact of increased development at greater height and density, Hounslow has bolstered its policy framework. Hounslow's Local Plan (2015) contains six design policies (CC1-CC6)<sup>6</sup> which reinforce national policy and cross reference key London Plan documents and guidance. Policy CC1 cross references the borough's 'Urban Character and Context Studies' (2014, due to be updated),<sup>7</sup> a suite of documents that identifies 11 different study areas in the borough, characterising these areas in urban and architectural terms and providing guidance for suitability of future development.

### 3. STRUCTURE OF THE PLANNING TEAM

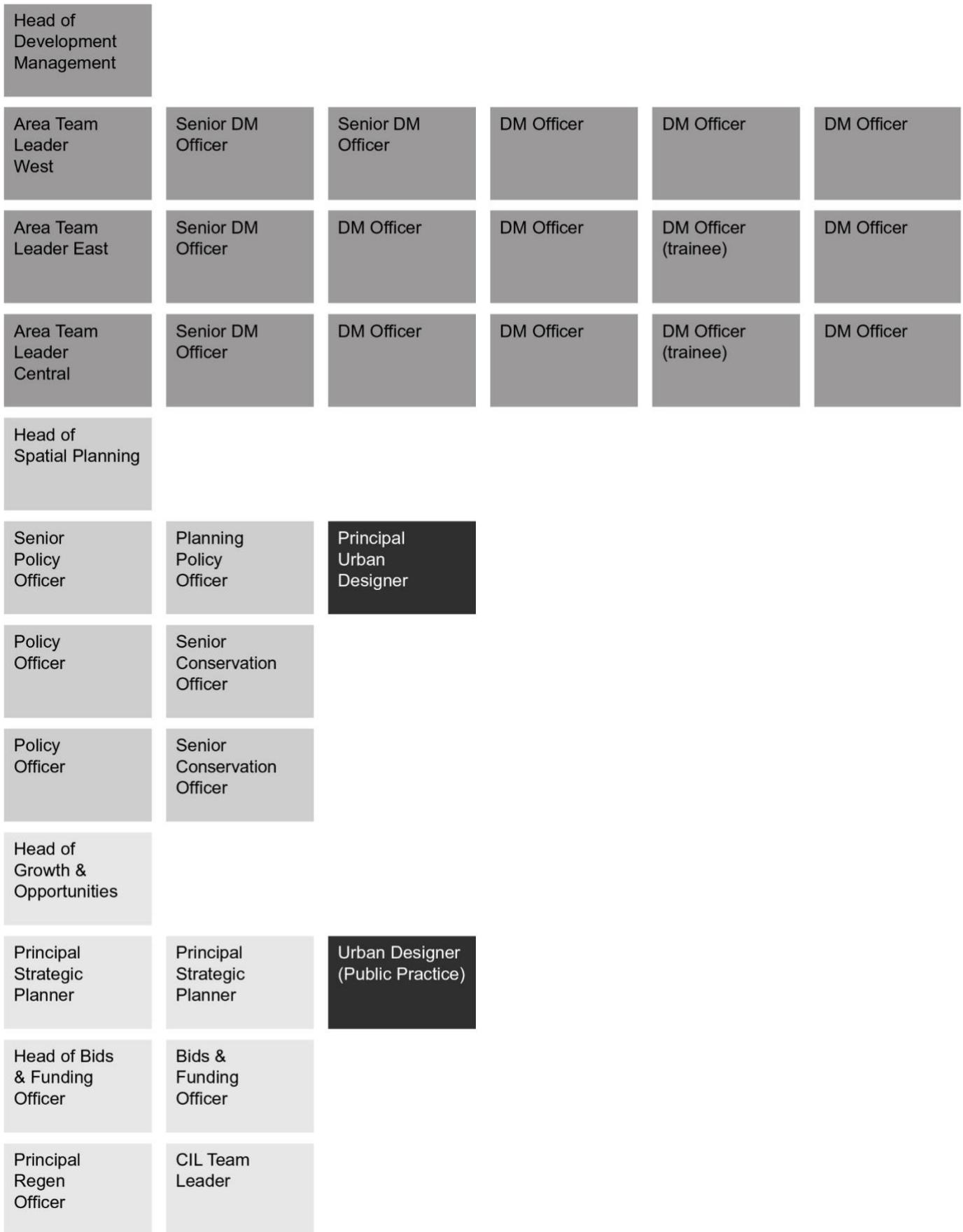
The structure of Hounslow's planning team illustrates that specialist in-house design knowledge is limited and spread thinly between the three spatial planning teams that sit under the Housing, Planning and Communities directorate.

There are two in-house Urban Design Officers and their design advice is sought at key points; during bi-weekly 'majors' meetings; at roundtable discussions where planners and other consultees - such as housing, transport planners and conservation officers - discuss major applications alongside the two Urban Design Officers; and when officers are due to hold pre-app meetings with applicant teams. In addition, bi-weekly 'urban design surgeries' allow space for more focused discussion about urban design issues.

<sup>5</sup> [london.gov.uk/what-we-do/planning/london-plan/new-london-plan/draft-new-london-plan/chapter-4-housing/policy-h1-increasing-housing-supply](https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/draft-new-london-plan/chapter-4-housing/policy-h1-increasing-housing-supply)

<sup>6</sup> Hounslow Local Plan 2015-2030 Vol. 1 [hounslow.gov.uk/info/20167/local\\_plan/1108/local\\_plan](https://www.hounslow.gov.uk/info/20167/local_plan/1108/local_plan)

<sup>7</sup> [hounslow.gov.uk/info/20034/planning\\_policy/1097/urban\\_context\\_and\\_character\\_study](https://www.hounslow.gov.uk/info/20034/planning_policy/1097/urban_context_and_character_study)



Housing, Planning, Communities directorate team structure showing the position of Hounslow's two Urban Design Officers in relation to spatial planning teams within the directorate.

#### 4. CURRENT FEEDBACK MECHANISMS

Design advice is primarily given verbally. There is no protocol or template for Urban Designer Officers to provide written feedback to be incorporated into pre-application feedback, although written comments may be provided to the case officer via email. A sample of official pre-app responses sent to applicants highlighted the range of approaches to integrating design concerns and the lack of a consistent template used by officers. For example, officers will refer to design policies in the London Plan, the emerging London Plan and importantly the Hounslow Local Plan (2015) and will refer to Hounslow's 'Urban Character and Context Studies' (2014), but these policies are rarely used to structure or shape design comments.

## APPROACH

The research drew on the experience in-placement as one of two Urban Design Officers at LB Hounslow, and followed the following process:

### 1. OFFICER SURVEY

A survey was undertaken, with a questionnaire sent to all 15 of Hounslow's case officers to understand their workloads and to draw out their opinions of current feedback mechanisms. The survey explored officers' perceptions of the quality of design in applications, identified areas where they felt they needed more training in order to appraise design quality, and examined other factors that might contribute to raising design standards in the borough. The findings of the survey represent the responses received from 12 officers and led to the development of two trackers.

### 2. DEVELOPMENT OF AN URBAN DESIGN TRACKER

The urban design tracker was based on a resource originally created by urban design officers at LB Havering to document design commentary. Sections of this tracker were structured according to the National Design Guide, not because the criteria for a 'well designed place' were exhaustive, but because they offered a useful starting point, with the tracker progressing logically through design considerations, from strategic- to detailed-design matters, backed up by policy guidance from the National Design Guide.<sup>8</sup>

### 3. DEVELOPMENT OF A MEETING TRACKER

A 'meeting tracker' was developed in collaboration with a Hounslow case officer as a simplified version of the design tracker. This was used to structure bi-weekly 'majors' meetings, to help focus and streamline topics for discussion and to record clear outcomes.

### 4. TESTING OF TRACKERS

The trackers were 'tested' on a range of schemes and used to structure 'majors' meetings and feedback was sought from case officers on the trackers as practical tools to streamline processes and monitor design feedback. The trackers are 'live' tools that continue to be used in LB Hounslow and trialled elsewhere to monitor and evaluate design quality.

<sup>8</sup> 'National Design Guide: Planning Practice Guidance for Beautiful, Enduring and Successful Places' MHCLG, October 2019 para 35.

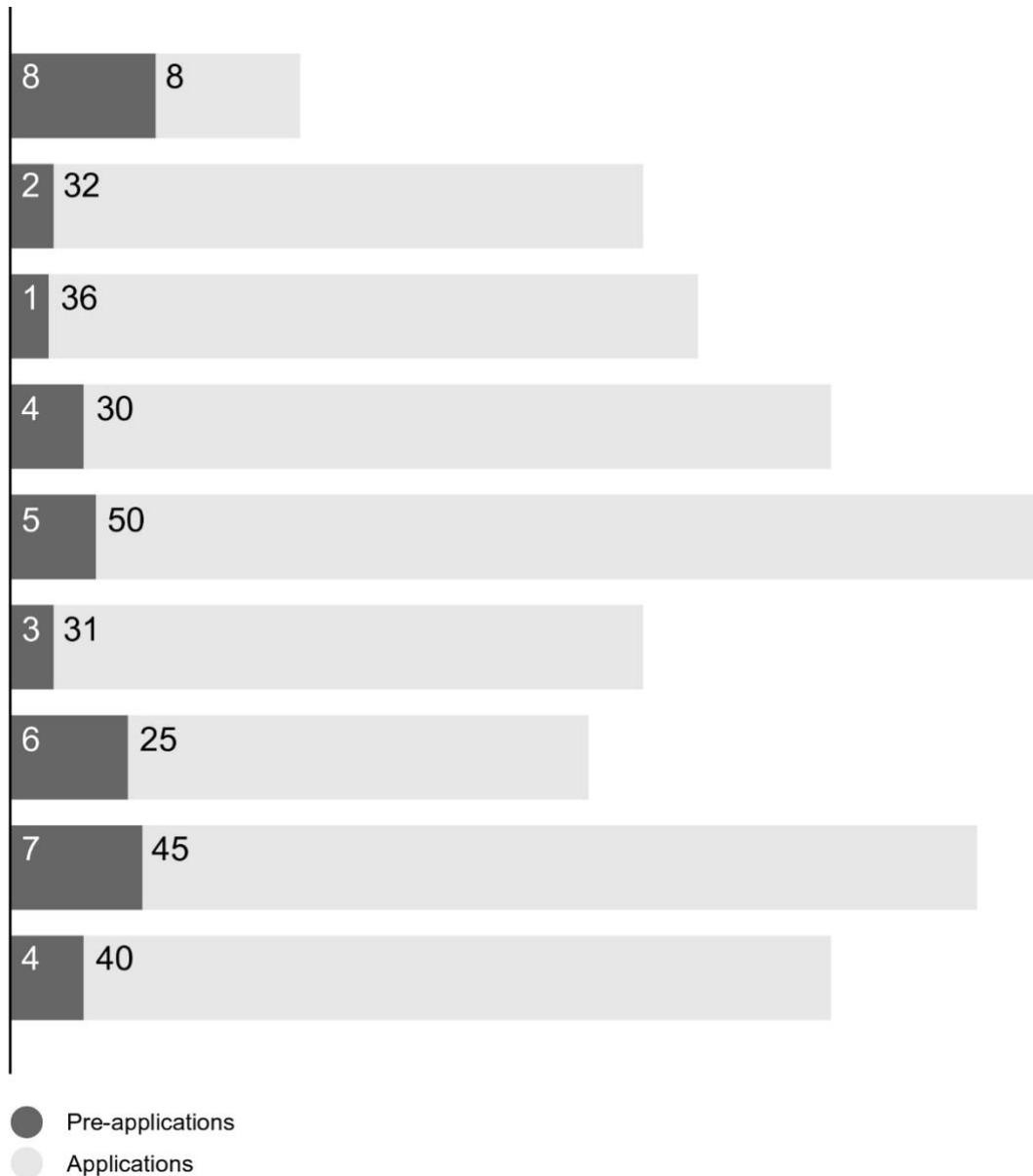
## FINDINGS

The Hounslow case study revealed that Local Authorities can be significantly under-resourced when it comes to providing urban design advice during the pre-app process. Without a template for officers to document pre-app design discussions and to provide written feedback to applicants based on design policy and/or guidance, there can be inconsistencies which may not support the best design outcomes.

The survey confirmed notional findings gathered from meetings and discussions with Hounslow case officers held over the course of the year regarding their ability to scrutinise and influence design quality through the pre-app process. It revealed that:

# 1. OFFICERS ARE DEALING WITH LARGE NUMBERS OF CASES AT ANY ONE TIME

Although most officers were dealing with over 30 cases - either pre-apps or live applications - at the time of the survey, time was not considered to be the greatest limiting factor to shaping design quality.



Survey results: How many applications are you currently working on?

**2. A LACK OF DESIGN TRAINING AND LACK OF SUFFICIENT GUIDANCE, CODES AND STANDARDS WERE PERCEIVED TO BE THE GREATEST CHALLENGES TO INFLUENCING DESIGN QUALITY**

The vast majority of officers noted a desire for more design training and/or for better design standards, guides or codes to support and enable them to scrutinise and influence a scheme during the pre-app process to achieve the best design outcomes.

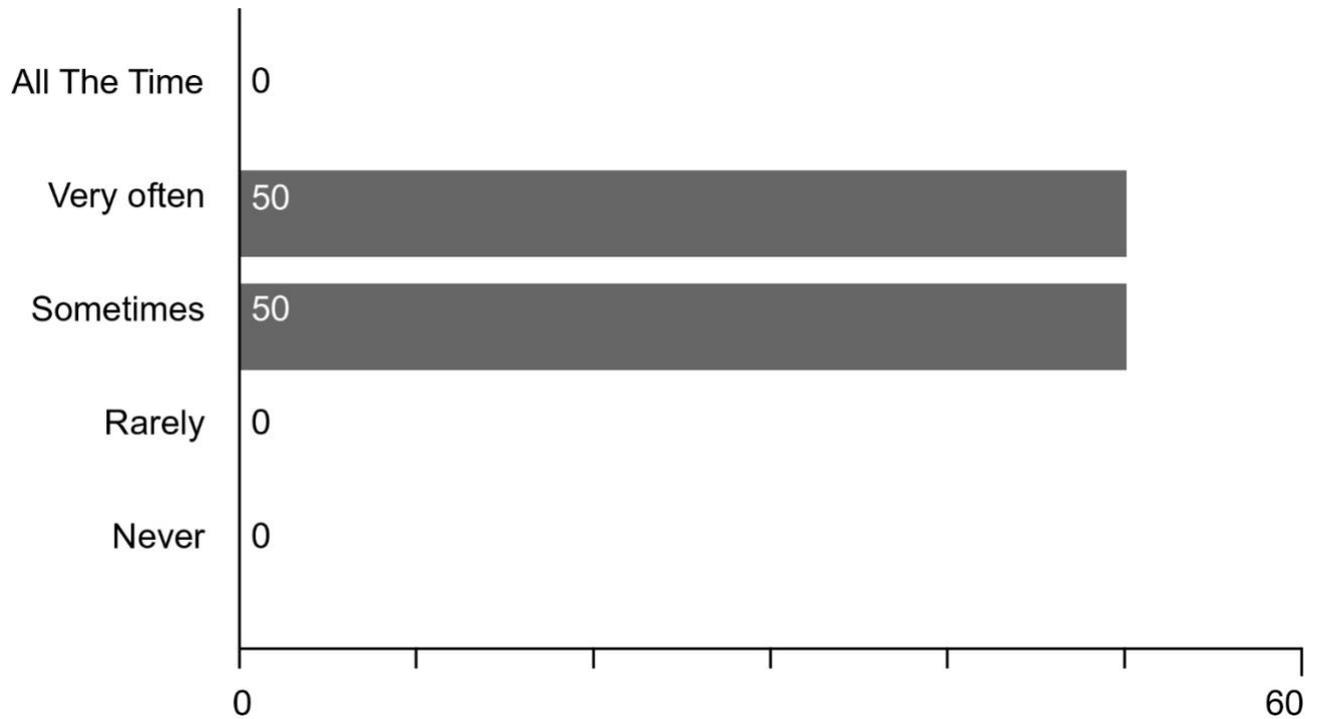


- 1. I don't have as much time to spend on design
- 2. Lack of in house design expertise
- 3. Need more design training
- 4. Need more guidance, codes, standards to measure design quality
- 5. Other

Survey results: Do you feel you are able to effectively scrutinise and influence a scheme during pre-app? What do you find the biggest challenge?

### 3. THE POOR DESIGN QUALITY OF MANY PRE-APPLICATIONS WAS A SHARED CONCERN

Half of all respondents sometimes or very often received applications that were considered to demonstrate poor design quality.



Survey results: How often do you receive applications that in your opinion are 'poorly designed'?

#### 4. DESIGN QUALITY OF SCHEMES WAS A VERY OR EXTREMELY IMPORTANT CONSIDERATION

Three quarters of all respondents considered that quality of design was important, either to such an extent that if the design was good then all other considerations would take care of themselves, or to the extent that design ranked as importantly as any other considerations.



- 1. Extremely important - if design is good all other issues fall into place
- 2. Very important - but one of many issues to consider
- 3. Not so important - it is nice to have but other issues take precedence
- 4. It depends on the scheme

Survey results: When assessing an application how important a consideration is design?

## 5. SUPPORT WAS NEEDED BY OFFICERS TO APPRAISE MANY ASPECTS OF DESIGN

Many officers felt they lacked adequate knowledge and skills to confidently appraise design quality and felt in need of additional training or upskilling in areas including sustainable design, public realm and landscape design, detailed design, architectural style and form, and layout, scale and massing of buildings.



- 1. Landscape, trees & planting
- 2. Public realm & urban design
- 3. Layout, scale & massing of buildings
- 4. Architectural style, composition & form
- 5. Detailed design, materials and construction
- 6. Sustainable design

Survey results: What aspects of design scrutiny do you think you need more support with?

## 6. MONITORING DESIGN COMMENTARY CAN SUPPORT OFFICERS TO BE MORE EFFECTIVE

Feedback was gathered from Hounslow case officers on the value of the trackers as practical tools, and initial feedback indicated that:

- Trackers helped to broaden officers' understanding of design issues.
- Trackers supported the provision of more robust, detailed design commentary.
- The Urban Design tracker could be time consuming to complete when officers had to scrutinise the design quality of a scheme using the tracker, but it was helpful for identifying a full range of design considerations.

## RECOMMENDATIONS

The trackers are 'live' tools and are still being used in LB Hounslow and tested to evaluate their effectiveness in shaping the quality of design outcomes. Initial use and testing of the 'urban design tracker' and 'majors meeting tracker' suggest the following recommendations:

### 1. TRACKING AND MONITORING DESIGN FEEDBACK

There is a need for Authorities to set up a structured and rigorous pre-app process to monitor and evaluate design quality and to provide clear and consistent feedback to applicants in line with national and local design guidance in order to secure design quality through the pre-app process.

- Early engagement with applicants is key to successful outcomes.
- Use of an Urban Design Tracker and / or a Majors Meeting Tracker is one step in a complex process of increasing the capability and capacity of DM officers and planning departments.
- The trackers will be most effective when used as part of a well-structured, collaborative PPA process.
- The trackers will be most effective when supplemented by Design Review. The tracker should integrate recommendations from a Design Review Panel or should note divergences.
- The trackers will most meaningfully shape design when DM officers are empowered to be proactive and are able to clearly articulate the local authority's vision for particular sites and areas of the borough, which may take time to build the capacity, knowledge and skills.
- The trackers may be particularly useful when evaluating and monitoring major applications or when evaluating larger, strategic schemes to ensure high quality outcomes.

The following diagram illustrates the use of the tracker and its role within the programme of pre-application and internal meetings and submission of information by the applicant.

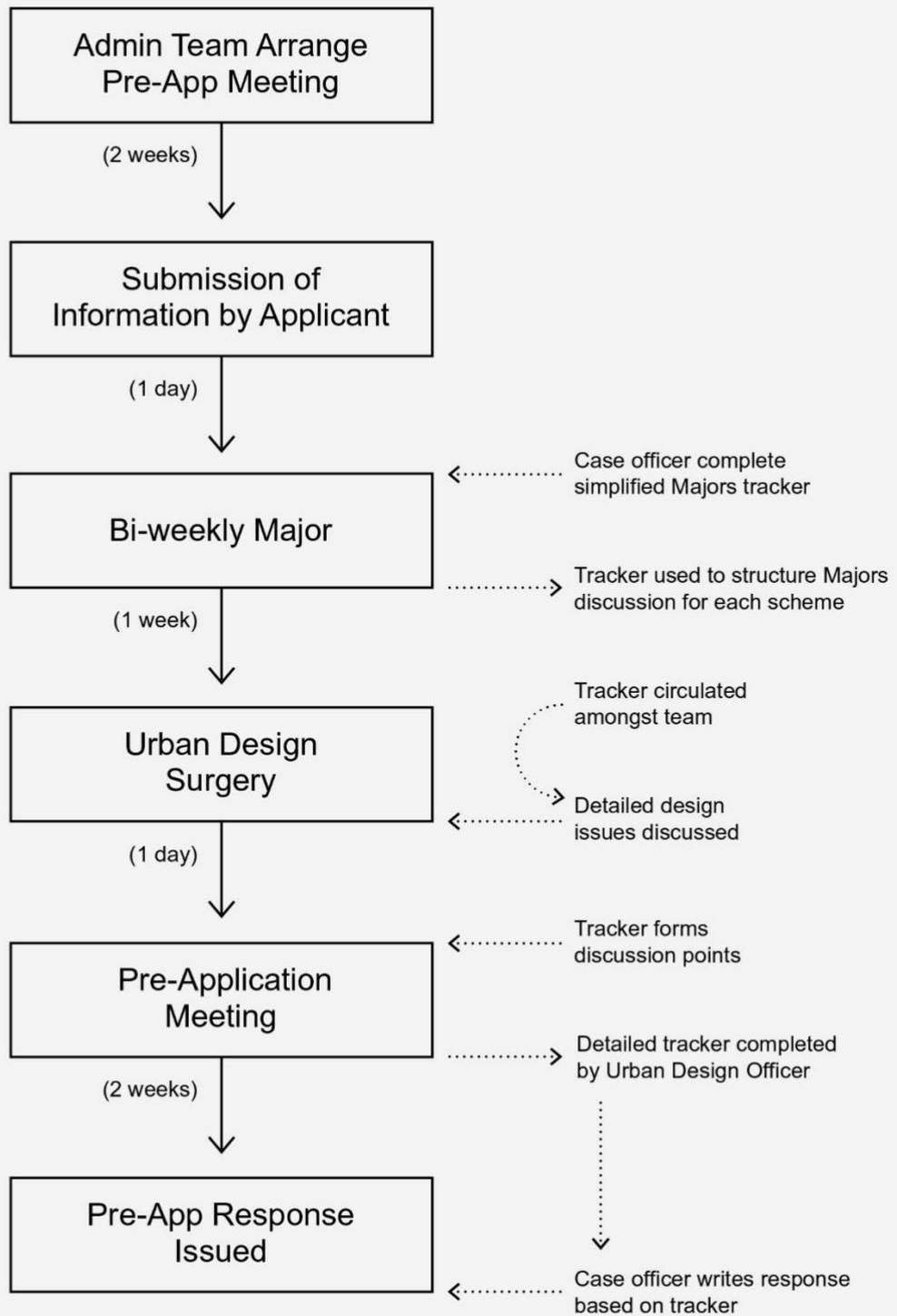


Diagram showing use of tracker at various stages in pre-app process

## 2. USE OF THE TRACKERS

Two resources accompany these recommendations, an Urban Design Tracker and a Majors Meeting Tracker. The resources can be downloaded from [publicpractice.org.uk/resources](http://publicpractice.org.uk/resources).

The table below explains how the two resources might be used within an Authority, by whom and at what point in the pre-app process, highlighting why each of the resources could be a useful tool to monitor and shape design quality through the pre-app process. The table should be read in conjunction with the testing and trialling of the trackers for the assessment and monitoring of design quality to ensure the most effective outcomes.

RESOURCE TYPE	URBAN DESIGN TRACKER	MAJORS MEETING TRACKER
WHEN TO COMPLETE	Upon review of submission materials prior to pre-application meeting with applicant. Detailed assessment completed after meeting.	Prior to bi-weekly majors meeting and circulated to planning team and consultees one day before, then filled out in more detail during majors as a record of discussion.
WHO TO COMPLETE	Urban design officer or case officer (with support from urban design officer).	Case officer (prior to meeting with other consultees).
WHY	<ul style="list-style-type: none"> <li>- Helps to structure discussion with applicant.</li> <li>- Ensures thorough and consistent assessment of design criteria across schemes.</li> <li>- Provides consistent feedback format for case officers.</li> <li>- Allows easier tracking of design comments throughout pre-app process.</li> <li>- Serves as a learning aid for case officers, ensuring they are aware of breadth of design considerations.</li> </ul>	<ul style="list-style-type: none"> <li>- Ensures case officer forward plans prior to major meeting.</li> <li>- Allows consultees an insight into key issues they may need to research prior to majors.</li> <li>- Streamlines and focuses majors discussion allowing more schemes to be discussed in an efficient manner.</li> </ul>
OUTPUT	Completed design tracker can be used to help case officer structure detailed design feedback in official pre-application correspondence, ensuring consistency between case officers. Tracker could be sent directly to applicant if appropriate to support pre-app letter.	Completed tracker is circulated to all attendees of majors meeting and if more detailed assessment needed, relevant consultee can complete. Design comments can be carried over into urban design tracker.

## NEXT STEPS

This Practice Note has continued investigations into methods and processes for shaping design quality through the pre-app process, following on from Practice Note PN001, 'Planning Ahead'.<sup>9</sup> To take these findings further, the following areas of research would benefit from further development:

- Undertaking further work to make the design tracker more user-friendly and applicable to the assessment and monitoring of different types of pre-app scheme and different scales of development.
- Gathering ongoing feedback on the practical use value of the trackers, for example who is using them and how, whether they are too formulaic for widespread use, how applicants are responding and whether a RAG system is needed.
- Gauging whether a design tracker can ever substitute in-house design expertise.
- Developing the tracker to reflect or respond to scheme iterations and to monitor if / when advice and recommendations have been taken on board.
- Developing a flow chart or decision tree to guide case officers to relevant resources or to external support to aid and clarify decision making in pre-app.
- Developing a tracker that can be used for a planning committee report with reference to relevant policy in the NPPF and National Design Guide.
- Developing a suite of documents / trackers that look at a range of design issues in more detail, such as landscaping or sustainability, or drawing on existing resources such as a 'Building for Life' tracker.
- Developing a template for 'reflections' on pre-apps to improve learning within the department and share lessons from schemes.
- Developing a separate tracker for minor applications.

Public Practice welcomes feedback on the findings and recommendations set out in this Practice Note to help update the resources and inform future research. Please contact us at [info@publicpractice.org.uk](mailto:info@publicpractice.org.uk).

<sup>9</sup> [publicpractice.org.uk/resources/planning-ahead](https://publicpractice.org.uk/resources/planning-ahead)

## ACKNOWLEDGEMENTS

This Practice Note was produced by Amanda Rashid as part of a year-long placement as a Public Practice Associate in the London Borough of Hounslow. It was edited by Helen Goodwin at Public Practice.

The author would like to acknowledge the following people and organisations for their participation in the research carried out for this Practice Note: London Borough of Havering; LB Hounslow Development Management team; Kiri Shuttleworth, LB Hounslow; Urban Design London.

This Practice Note and accompanying resources was discussed at a roundtable convened by Public Practice on 2 June, 2020. Public Practice and the author would like to thank respondents Paula Goncalves, Brighton and Hove City Council; Conor Keappock, LB Hackney; Kiri Shuttleworth, LB Hounslow, whose feedback from the event has been incorporated.

Published June 2020

PUBLIC PRACTICE  
Urban Innovation Centre  
1 Sekforde Street  
London, EC1R 0BE, UK

[www.publicpractice.org.uk](http://www.publicpractice.org.uk)  
[info@publicpractice.org.uk](mailto:info@publicpractice.org.uk)

This work is licensed under the Creative Commons  
Attribution 4.0 Unported License

The pre-application process plays a critical role in shaping the quality of applications and in promoting design excellence. When successful it helps to translate design briefs, strategic visions and planning objectives into the delivery of well-designed places, homes and neighbourhoods.

There are currently inconsistencies and variations in the way that design advice is monitored and fed back to applicants during the pre-app process, both within and across Authorities. This can lead to confusion, undermining confidence in the planning system and resulting in lower quality outcomes. This Practice Note considers how a more rigorous system of monitoring and tracking design guidance can give officers confidence when appraising the merits of a scheme and help to secure design quality.

Drawing on research carried out during a year-long placement in the London Borough of Hounslow, it sets out measures that development management officers can take to appraise design quality and track feedback. The Practice Note is accompanied by two trackers that can be used by Authorities during the pre-app process.

#CapacityBuilding #Design #DevelopmentManagement  
#PlanningProcess #PreApplication

Practice Notes and other resources are available to download at [www.publicpractice.org.uk/resources](http://www.publicpractice.org.uk/resources)